GOLD STANDARD ENROLMENT FRAMEWORK
1. Introduction

The issue of identity security was addressed by the Council of Australian Governments (COAG) Special Meeting on Counter-Terrorism on 27 September 2005. The resulting communiqué noted that “The preservation and protection of a person’s identity is a key concern and right of all Australians”, and heads of government agreed to the development and implementation of a National Identity Security Strategy (NISS).

This Framework is intended to operate in conjunction with other elements of the NISS, such as efforts to improve the security of identity documents, authentication standards, biometric interoperability, the integrity of identity data holdings, and procedures for document verification.

The Framework’s prime focus is on ensuring applicants for government documents that also may function as key documents for proof of identity (POI) purposes are subject to a rigorous process of identification and verification. The Framework provides a comprehensive approach to the establishment of identity by individuals. It does not address other enrolment considerations such as eligibility and entitlement.

In 2004 the Standing Committee of Attorneys-General endorsed use by agencies of a POI Framework (at Attachment A). The POI Framework may be read in conjunction with this report.

The Framework and the processes embedded in it are intended for use by government organisations at this time, but could serve as a benchmark for private sector customer identification and verification processes. While the Framework does not directly apply to processes employed by agencies when registering and enrolling individuals for government benefits and services, it could however be referenced as appropriate within the broader personal identification frameworks that apply to such enrolment processes.

The National Identity Security Coordination Group will provide the ongoing governance necessary to maintain and develop the Framework in light of policy, legislative and technological developments, and changes in the environment and risk criteria for credentials which will occur over time.

2. Purpose

Secure enrolment is a pre-requisite to building an identity security system of high integrity. Accordingly, it is necessary that sufficiently high quality processes are put in place to register, enrol and issue key POI credentials to individuals and for these processes to be embraced and applied consistently by relevant credential issuing agencies.

As credentials used as POI play an important role in the community, the issuing of such credentials is a high risk process requiring a high integrity enrolment approach to reduce the risk of identity crime. Adherence to the Framework would enable greater consistency in the registration of identity details and enhance public confidence in government enrolment and registration processes.

3. Scope

The Framework specifies a premium, or “Gold Standard”, approach for use by government agencies who enrol individuals for the purpose of issuing government documents that also may function as key documents for POI purposes. This Framework provides a firm foundation for other elements of the NISS, but does not include efforts to improve the security of identity documents, authentication standards, biometric interoperability, the integrity of identity data holdings, and procedures for document verification.

1 Credential is a generic term that can apply to both paper documents and non-paper based objects such as smartcards and other tokens.
This framework is not intended to apply to the issuance of birth certificates at or near the time of birth.

4. Principles for Gold Standard Enrolment

Application of the Gold Standard

Principle 1: The Gold Standard will define a high quality approach to enable the consistent and robust enrolment of individuals and give a strong assurance of individuals’ identities. The use of the Gold Standard will also underpin other measures to enhance identity security under the NISS.

Principle 2: The Gold Standard should be applied in circumstances where the consequences flowing from registering a false identity are high and a high level of confidence in establishing a person’s identity is required. It should be used when issuing key POI credentials or for national security checking purposes.

Principle 3: Gold Standard enrolment will need to adhere to relevant privacy principles and privacy regimes.

Evidence used to identify the applicant

Principle 4: Gold Standard enrolment will need to establish evidence of a person’s commencement of identity in Australia. In most cases, this will involve verifying a person’s name and gender as registered with a Registrar of Births, Deaths and Marriages or, in the case of people born overseas, the Department of Immigration and Citizenship as the basis for issuing key POI credentials.

Principle 5: Gold Standard enrolment will need to establish evidence of a person’s identity operating in the community. In most cases, this will involve verifying a person’s ‘social footprint’ from credentials or other information establishing a person’s use of identity in Australia over time.

Principle 6: Gold Standard enrolment will need to establish evidence of a linkage between the applicant and the claimed identity. This will usually involve the presentation of government-issued POI credentials embodying photographic or biometric identity features. These credentials might also be used to establish commencement and use of identity under Principles 4 and 5 above.

Verification of POI credentials or information

Principle 7: POI credentials and other information provided by the applicant to satisfy Principles 4 to 6 should be verified with the relevant issuing authority or other authoritative source.

Interviewing the applicant

Principle 8: An enrolling agency should conduct a face-to-face interview when issuing government documents that also may function as key documents for POI purposes.

Principle 9: An enrolling agency should bind the applicant to the identity recorded on the POI credential that is issued by taking a photograph or a biometric of the applicant. This will ensure that the agency can subsequently check to whom the POI credential was issued.

Streamlined interaction after a Gold Standard enrolment

Principle 10: An enrolling agency should in most cases enrol a person to a Gold Standard only once. Future authentication by that agency should rely on the POI credential issued by the agency. A full enrolment process may however be necessary depending on the integrity and currency of the POI credential.

Principle 11: An enrolling agency should only issue a key POI credential when the claimed identity has been sufficiently validated in accordance with Gold Standard enrolment procedures.
**Principle 12:** A key POI credential issued as a result of a Gold Standard enrolment could be used to streamline enrolments with other agencies.

**Principle 13:** Where an enrolling agency already possesses information verifying a client’s identity to the equivalent of a Gold Standard (a known customer), that identification process may be used to streamline further enrolment for a new key POI credential. A ‘known customer’ should however be required to provide evidence confirming their identity in accordance with Principles 7-9 above.

**Developments in technology**

**Principle 14:** Gold Standard enrolment principles will be revised in the future to incorporate developments in biometric technology.

### 5. Processes for Gold Standard enrolment

Gold Standard enrolment should include the following processes:

#### 5.1 The application stage

- Lodgement of the application;
- Initial assessment of the application to confirm it has been correctly completed and contains sufficient information to enable verification of the applicant’s claimed identity as per Principles 4 to 6;
- Recording the details of POI credentials or information presented by applicants;
- Verification of key POI credentials or information. Verification can take place prior to the interview;
- Noting the applicant’s record with the verification result(s).

#### 5.2 Pre-interview assessment

- On the basis of information provided by the applicant the enrolling agency will check its identity register for an existing enrolment to ensure the applicant is not already enrolled.
- The enrolling agency will assess whether the applicant:
  - has already been enrolled to a Gold Standard;
  - is likely to achieve Gold Standard verification of their identity;
  - is likely to need additional assistance to identify themselves to the Gold Standard level.
- There are several ways in which an applicant may be able to satisfy the Gold Standard principles. A principle may be satisfied by either reference to a registration in an appropriate identity register, a credential that evidences that registration, or rigorous enquiries and detailed checks which satisfy the same requirement.
- Where an agency is satisfied that an applicant has already been enrolled to a Gold Standard then an abbreviated face-to-face interview process may be implemented.

#### 5.3 The interview

- Where the applicant attends a face-to-face interview with the agency or its nominated representative, the applicant should provide at that interview:
  - the original application form (if not already submitted);
  - original POI credentials or verifiable information providing evidence of their commencement, use and linkage of identity;
• explicit consent to verify the credentials or information provided.

• The applicant may be required to have biometric detail recorded during the interview (e.g. a photograph) that will bind the applicant to the claimed identity.

• The interviewing officer should check the originals of any POI credentials or information submitted to ensure:
  o the credentials or information satisfy Principles 4 to 6;
  o that there are no physical signs of tampering of any credentials;
  o the applicant’s name is on every credential. Where the POI credentials bear a different name then the linkage between that POI credential, the name to be registered and the applicant must be clearly established;
  o the applicant’s date of birth is on at least one of the credentials;
  o a recognisable photograph of the applicant is on at least one of the credentials;
  o the applicant’s signature is on at least one of the credentials;
  o the applicant’s address is on at least one of the credentials;
  o if required, that none of the credentials have expired.

5.4 Verification of credentials and/or information

• The enrolling agency should verify POI credentials if not already undertaken.

• The enrolling agency retains a copy of the POI credentials or information presented. This process could be optional if the POI credentials are electronically recorded and verified.

• The original POI credentials are returned to the applicant.

• Key information provided by the applicant will need to be verified. Verification may be performed by reference to an appropriate identity register or other authoritative source.

5.5 Post application

• The enrolling agency should conduct follow-up investigation of individuals presenting unverifiable credentials or information;

• The enrolling agency should conduct follow-up investigation of individuals presenting credentials which have been recorded as lost or stolen;

• The enrolling agency should review enrolments which exhibit risk2 and investigate anomalies to ensure the integrity of the information that has been recorded;

• The enrolling agency should integrate enrolment processes with critical post enrolment mechanisms, such as:
  o establishing secure and reliable processes for registering change of name, gender or address, and for credential re-issuing processes;
  o cancelling credentials where appropriate to do so;
  o establishing reliable processes for the identification of expired credentials;
  o ensuring, where necessary, that appropriate internal controls around segregation of duties exist for staff involved in the issue of POI credentials;

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2 Risk refers to the enrolling agency’s risks identified in their risk assessment framework and fraud control plan.
ensuring processing staff hold suitable clearances;
- ensuring secure storage processes exist for scanned credentials and biometric data.

• issue the new credential or token of high integrity with regard to:
  - ensuring only authorised staff issue the credential;
  - security around the issue and collection of the credential.

6. Exceptions

6.1 Circumstances

Although a high proportion of the Australian population will be able to meet the requirements of a Gold Standard enrolment, some applicants may face genuine difficulty in identifying themselves in some circumstances.

Circumstances can occur when an individual does not possess, or is unable to obtain, the necessary information or evidence of commencement or use of identity in Australia to meet the Gold Standard (e.g. some homeless persons or some persons with mental health issues).

When an applicant is unable to provide the necessary POI credentials or verifiable information an enrolment process may entail:

- lodgement of an application;
- verification of the applicant’s claimed identity with authorised referees\(^3\);
- a face-to-face interview with the applicant;
- the applicant may be required to have biometric detail recorded (e.g. a photograph);
- the enrolling agency will be required to confirm the identity details by:
  - contacting referees who are authorised to perform the confirmation and obtaining from them the assurance that the individual is who they say they are;
  - if necessary, undertaking specific enquiries with persons and organisations associated with the applicant;
  - if the applicant is an established customer of appropriate agencies the claimed identity might be verified directly with those agencies.

Where commencement or use of identity cannot be established to a Gold Standard, it may be appropriate for the enrolling agency to issue the applicant a service-only credential.

6.2 Service - only credential

To varying degrees, all agencies have a minority of customers or clients who have difficulty meeting POI requirements even though they have a legitimate and legal entitlement to certain services or payments. These individuals generally do not have or are unable to obtain the necessary credentials, and/or are unable to provide sufficient information within relevant timeframes to enable enrolment to occur with a high level of confidence about the identity of the applicant.

Enrolling agencies could consider issuing a temporary credential where appropriate to allow the applicant to receive relevant services.

A service only credential would have limitations:

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\(^3\) An authorised referee is a person or organisation that holds a position of trust in the community and is known and listed by the enrolling agency to perform the function of a referee.
• it would lapse after a limited period of time, either when the individual is able to enrol to the Gold Standard, or when the registration expires;
• it would be issued for the sole purpose of doing business with the enrolling agency;
• it would not be accepted as a key POI credential by another agency.
## PROOF OF IDENTITY FRAMEWORK

<table>
<thead>
<tr>
<th>Objective</th>
<th>Documents Satisfying the Objective</th>
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<tbody>
<tr>
<td><strong>A  Evidence of commencement of identity in Australia</strong></td>
<td></td>
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<tr>
<td>(Mandatory for all agencies)</td>
<td>• Birth certificates</td>
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<tr>
<td></td>
<td>• Record of Immigration Status:</td>
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<tr>
<td></td>
<td>➢ Foreign Passport &amp; current Visa</td>
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<td></td>
<td>➢ Travel Document &amp; current Australian Visa</td>
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<tr>
<td></td>
<td>➢ Certificate of Evidence of Residence Status</td>
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<tr>
<td></td>
<td>➢ Citizenship Certificate</td>
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<tr>
<td><strong>B  Linkage between Identity and Person</strong></td>
<td></td>
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<tr>
<td>(Photo &amp; signature)</td>
<td>• Australian Drivers Licence (current &amp; original)</td>
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<tr>
<td></td>
<td>• Australian Passport (current)</td>
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<td></td>
<td>• Firearms Licence (current &amp; original)</td>
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<td></td>
<td>• Foreign Passport</td>
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<tr>
<td><strong>C  Evidence of Identity Operating in the Community</strong></td>
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<tr>
<td>(Could be another Category A or B document)</td>
<td>• Medicare Card</td>
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<tr>
<td></td>
<td>• Change of Name Certificate – Non Standard POI – (for marriage or legal name change – showing link with previous name/s)</td>
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<td></td>
<td>• Credit or Account Card</td>
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<td></td>
<td>• Centrelink or DVA card</td>
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<td></td>
<td>• Security guard/Crowd control Licence</td>
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<td></td>
<td>• BDM Issued Marriage Certificate</td>
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<td></td>
<td>• Tertiary ID Card</td>
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<tr>
<td><strong>D  Evidence of residential address</strong></td>
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<tr>
<td>(Used only to provide evidence of residential address if not provided by a Category B or C document)</td>
<td>• Utilities notice</td>
</tr>
<tr>
<td></td>
<td>• Rent details</td>
</tr>
</tbody>
</table>