

## ARA SUBMISSION

# 2024 DIGITAL ID RULES, ACCREDITATION RULES AND DATA STANDARDS

JULY 2024

The Australian Retailers Association (ARA) welcomes the opportunity to provide comments on the Commonwealth Government's *2024 Digital ID Rules, Accreditation Rules and Data Standards*.

The ARA is the oldest, largest and most diverse national retail body, representing a \$420 billion sector that employs 1.4 million Australians – making retail the largest private sector employer in the country. As Australia's peak retail body, representing more than 120,000 retail shop fronts and online stores, the ARA informs, advocates, educates, protects and unifies our independent, national and international retail community.

We represent the full spectrum of Australian retail, from our largest national and international retailers to our small and medium sized members, who make up 95% of our membership. Our members operate in all states and across all categories - from food to fashion, hairdressing to hardware, and everything in between.

In principle the ARA supports the new draft of the Digital ID Rules. As the retail sector continues to embrace digital technology to improve customer service and business continuity, the ARA believes that these measures will be beneficial to the sector.

In particular, the amendments to the draft Digital ID Rules and aligning it with anti-money laundering and counter-terrorism financing requirements are supported, as are the changes to reportable incidents. The ARA supports a strong stance in the rules to ensure strong legislative obligations for cyber security record-keeping and reporting.

The ARA supports the redrafted rules to clarify the conditions for the use or display of a digital ID Trustmark by accredited entities and believe it will provide greater public trust when customers provide their data to businesses. We also support a specific indemnity provision in the draft Digital ID Rules such as for unintentional non-compliance with legislative requirements, and caps on liability.

ARA further recommends the government continues to conduct separate consultations on the application of Digital ID as a mechanism to verify the identity of prospective employees.

---

Thank you again for the opportunity to provide a submission on the proposed Digital ID Rules. Any queries in relation to this submission can be directed to our policy team at [policy@retail.org.au](mailto:policy@retail.org.au).