

Submission to the National Competition Policy Analysis 2025

In response to the National Competition Policy Analysis 2025 and the proposed reform for a national occupational licensing scheme that promotes labour mobility, we wish to highlight a critical enabler of this transformation: a secure, interoperable digital identity verification framework.

Currently, Australia faces a fragmented and outdated identity verification landscape. Manual checks, siloed systems, and reliance on paper-based documentation continue to pose serious security, privacy, and efficiency issues.

The Case for Reform: Identity Verification Risks and Failures

- **Over 1 in 4 Australians** have been affected by data breaches in recent years, many linked to organisations storing large volumes of identity documents unnecessarily (OAIC 2023).
- **Identity theft costs Australians over \$3 billion annually**, and rising cyber-enabled fraud is heavily linked to weak or insufficient verification processes (ACSC Annual Cyber Threat Report).
- **Organised crime groups** exploit verification loopholes and data retention practices to access personal data, launder money, and defraud government systems.
- The **current NPCS model** has known vulnerabilities, requiring reforms that emphasise real-time, source-based verification with zero document storage.

A Digital Identity Model That Supports National Mobility

Australia needs a forward-thinking, privacy-centric digital ID infrastructure that:

- Enables **cross-border credential sharing** for qualifications and licences.
- Authenticates identities via **authoritative sources** (e.g., government databases).
- Avoids unnecessary **retention of sensitive personal data**.
- Prevents fraud with **biometric verification and cryptographic protection**.

TrueVault: A Nationally Scalable, Privacy-First Solution

While this submission is not vendor-centric, TrueVault provides a case study of a fit-for-purpose digital identity model that aligns with the goals of the proposed occupational licensing scheme:

- **Zero Data Retention** – No ID documents are stored, reducing the risk of breaches.
- **Verifiable Credentials** – ID, licences, and qualifications are checked at source, credentialised, and protected from tampering.
- **Biometric and MFA-secured** – Identity is verified using facial recognition and multi-factor authentication.

- **Reusable & Portable** – Once verified, credentials can be reused nationally, enabling seamless labour mobility.
- **Standards-Based & Agnostic** – Built for interoperability, not vendor lock-in.

A Call to Action

To create a productive, mobile workforce, credentials must move as freely as people. Identity must be secure, verifiable, and reusable. This reform is not just about convenience—it's about national security, economic efficiency, and citizen trust.

TrueVault urges the government to consider digital identity verification as a cornerstone of national licensing reform. We stand ready to provide further modelling, input, and collaborative support in the development of an interoperable framework.

Let's build the infrastructure to support Australia's future workforce: safe, mobile, and digitally empowered.