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**Australian Government
Digital Transformation Agency**

**Ministerial Brief
For Information**

MB20-000013

To: Minister for Government Services

Subject: Implementation of the Apple and Google Exposure Notification Framework (ENF)

Critical Date and Reason:	N/A
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Recommendation/s for Minister Robert: That you:

1. Note the Digital Transformation Agency (DTA) is working with Apple and Google to explore the applicability of the Exposure Notification Framework (ENF).	Noted / Please discuss
2. Note that Apple and Google have stated adopting their model is all or nothing. While we are still exploring options, we are currently unable to implement the Bluetooth enhancements without adopting the full framework. This would require significant changes to the COVIDSafe App and state and territory contract tracing processes.	Noted / Please discuss
3. Note the DTA will come back to you with a recommendation on the path forward on the Apple and Google ENF model in the next two weeks.	Agreed / Not agreed

Minister's Comments

Minister's signature:	Date: / / 2020

Key Points:

1. There have been media reports about the Bluetooth performance of the COVIDSafe App (the App) since launch. The Digital Transformation Agency (DTA) made changes to the App on 14 May 2020, which have significantly improved Bluetooth performance on both Android and iOS devices.
2. In parallel, the DTA has been working with Apple and Google to understand the Exposure Notification Framework (ENF), within the Australian COVID-19 response and contact tracing context. Apple and Google and the DTA have been collaborating well, they have acknowledged that Australia is one of the leading nations in the practical use of technology for contact tracing.

3. Apple and Google announced the initial release of the ENF on 20 May 2020. Although the full feature set will become incrementally available over several months.
4. It was originally understood that it would be possible to leverage Bluetooth connectivity improvements being offered by the ENF as a standalone capability. It has since been discovered that Apple will require us to adopt their full solution which operates in a very different way to COVIDSafe.

Operating model and Bluetooth performance

5. A public health contact tracing model was recommended by the Australian Health Protection Principal Committee to the Australian Government in combating COVID-19. The Apple and Google ENF is a community tracing program. This works for communicable diseases like sexually transmitted diseases. This is not the approach used for virulent diseases like Smallpox where public health contact tracing is used.
6. Adopting the ENF would mean revisiting decisions that have underpinned our current model supporting public health outcomes. The decentralised model that Apple and Google are proposing would reduce our control over health policy and limit access to the information required to allow States and Territories to effectively manage the pandemic and recovery.
7. Under the ENF, a person can self-assert that they have COVID-19, causing a message to be sent to their 'close contacts' (that is, people who meet the close contact criteria as defined by Apple and Google). Health officials are not involved in this process. This limits a public health official's ability to undertake contact tracing.
8. Push notifications are the primary mechanism to notify close contacts under ENF. Notifying close contacts through an app-based notification may cause alarm, particularly if state and territory health officials are not involved. Third party verification of a positive diagnosis is also not part of the ENF. This varies significantly from the COVIDSafe framework, and was explicitly rejected as a model by the Government.
9. Our current assessment is that adopting the proposed ENF will be of limited use in the current contact tracing model. It would also require significant changes to the App to enable integration. Elements of the ENF may enable further performance improvements to the App and it is worthwhile to continue discussions with Apple and Google regarding our capacity to consume specific element of the ENF.

10. [Redacted] Section 33 [Redacted]

11. Apple have advised the business point of contact for ENF is [Redacted] Section 47F [Redacted] Apple has offered arrange a meeting if required.

Benefits of ENF

12. The major benefit of ENF is the promised Bluetooth connectivity improvements. While Apple and Google have represented this improvement to us, we have been unable to validate these claims and compare them to the Bluetooth improvements we have already made. The ENF does not surface information about Bluetooth performance to our developers in a way that can be easily tested. We are continuing to test and determine if the Bluetooth enhancements suggested by Apple and Google are worth considering compromising our approach.

13. The ENF would allow Australia to connect to a global contact tracing solution. While useful, the expected restrictions on international travel in the short to medium-term would render this of little use in the short to medium-term.
14. Certain users who have avoided the App may perceive that the ENF provides stronger privacy protections though this largely decentralised, non-government-controlled model.

Cons of ENF

15. Our initial investigation has revealed that adopting the ENF will require significant technical changes including:
 - The App would need to be significantly redesigned and rebuilt. The ENF cannot simply be embedded into the current App.
 - The Health Portal would also need to be redesigned and rebuilt.
 - A new Privacy Impact Assessment would need to be conducted and legislative amendments may be needed.
 - All current users would need to transition to the new App (download and re-register) and contact data collected to date would not be transferred.
16. The ENF offers less device compatibility compared to our current system for Apple users. The ENF is only compatible with iPhone 6 or later that are running iOS version 13.5 or above (iOS 13.5 was released 20 May 2020). Android users running version 6.0 or later will be able to access the ENF, aligning with COVIDSafe operating system compatibility.

Sensitivities:

17. There is current media interest in the ENF and Australia's position towards adopting it. While most articles reflect our current position that we are still exploring ENF, there have been media articles that give the impression that the Australian Government has already decided to adopt the ENF. Members of the privacy and security community continue to advocate for the ENF due to the perceived privacy enhancements.

Financial Impacts: N/A

Regulatory Impacts: N/A

Consultation:

18. The DTA briefed the Department of Health on the ENF to support Minister Hunt's meeting with Section 47F on Thursday 21 May 2020. DTA has engaged Health and the Deputy Chief Medical Officer Paul Kelly on this work.

Cleared: 22 / 05 / 2020
Peter Alexander
Chief Digital Officer
Digital Delivery and Corporate Division
M: Section 47F

Contact Officer:
Anthony Warnock
Head, Digital Infrastructure Service
Digital Delivery and Corporate Division
M: Section 47F