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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. s 47E(d) [Redacted] This would require significant changes to COVIDSafe and state and territory contract tracing processes.	Noted / Please discuss
3. s 47E(d) [Redacted]	s 47E(d) [Redacted]

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. s 47E(d) [Redacted]

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. s 47E(d)

Operating model and Bluetooth performance

5. s 47E(d)

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. s 47E(d)

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, s 47E(d)

9. s 47E(d)

It would also require significant changes to the App to enable integration. Elements of the ENF may enable further performance improvements to the App s 47E(d)

10. s 47E(d)

11. Apple have advised the business point of contact for ENF is s 47E(d)

. Apple has offered arrange a meeting if required.

Benefits of ENF

12. The major benefit of ENF is the promised Bluetooth connectivity improvements. s 47E(d)

13. s 47E(d)

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:


s 47E(d)



Financial Impacts: N/A

Regulatory Impacts: N/A

Consultation: s 47E(d)



Cleared: 22 / 05 / 2020

Peter Alexander

Chief Digital Officer

Digital Delivery and Corporate Division

M: s 47E(d)

Contact Officer:

Anthony Warnock

Head, Digital Infrastructure Service

Digital Delivery and Corporate Division

M: s 47E(d)