

12 July 2021

Digital Transformation Agency  
PO Box 457  
Canberra City  
ACT 2601

Dear Digital Transformation Agency

## Submission in response to Phase 2 consultations

The Interactive Games & Entertainment Association (IGE A) welcomes the opportunity to contribute to the DTA's consultation on Phase 2 of Australia's Digital Identity legislation. IGE A represents the video games industry in Australia and New Zealand, including the developers, publishers, and distributors of video games, as well as the creators of the most popular gaming platforms, consoles, and devices.

We broadly welcome efforts such as the proposed legislative framework that will help to strengthen voluntary digital identity management processes. We note that the scope of the proposed framework is intended to include not only the Australian Government, but state, territory and local government, and the private sector.

We supported the views of stakeholders like the Communications Alliance and Telstra during the Phase 1 consultations that stressed the importance of the proposed digital identity framework being voluntary for industry. We therefore welcome the confirmation in the position paper that the proposed framework will remain voluntary for industry. We also welcome the proposal that any future legislation will make it clear that it is not intended to regulate all digital identities and digital identity systems, and that it will be a matter of choice whether entities wish to use or provide services via the system.

Some of our members already implement various identity management processes and technologies for the consumers of their products, including to help protect game players against fraud and cheating, to protect their game's copyright, and to assist parents manage what games their children can access through family controls. As our industry is constantly innovating in this area, and often implement digital identity management processes at a global level, it is critical that the proposed legislative framework remain voluntary for industry and does not create parallel mandatory sets of requirements.

With this in mind, it is clear that our view in this area is aligned with the proposed approach that the Government is taking and consulting on. We look forward to seeing the Digital Identity legislation take shape over the course of this policy process.

Should you wish to discuss this submission further, please contact me at [ben@igea.net](mailto:ben@igea.net).

Regards

Ben Au  
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