

Principles for the COVID-19 Contact Tracing App

The Australasian Institute of Digital Health (AIDH), in association with the Australian Healthcare and Hospitals Association (AHHA) lend their support to the principle of a contact-tracing app to aid in Australia's efforts to manage and suppress COVID-19. As healthcare, technology and information professionals, we adhere to the medical principle of 'first do no harm' and believe a contact tracing app that is private and secure has the potential to be Australia's *digital vaccine* against the spread of COVID-19.

As advocates for information privacy and the data rights of consumers, it is critical that the 9 principles below shape the design and governance of the proposed app.

1. **COMMUNICATION TRANSPARENCY** Clear, specific, purposeful communication with the public, with full disclosure about what the app is for, how it works, how it is designed, and how it is governed with independent auditing. Communications to be written in consumer 'plain language'.
2. **SAFE USER-FRIENDLY DESIGN** Design must use safety-by-design concepts to ensure it is inherently robust, safe and secure, with an independent body determining design integrity, safety and usability to be fit-for-purpose. The user experience to be optimised for accessibility and multi-lingual support.
3. **MINIMUM DATA COLLECTION AND SPECIFIC SCOPE** Data collected is to be the absolute minimum required for effective COVID-19 contact tracing. Scope creep beyond the emergency needs of COVID-19 pandemic response to be unlawful.
4. **DATA SECURITY** The data to be stored and shared on secure servers located in Australia that meet the standards set by the Australian Signals Directorate.
5. **OPT-IN AND END DATE** Use of the app to be optional and the app to prompt users on a regular basis to continue to grant permissions. Clear criteria to specify the app's termination.
6. **USER CONTROL** Assurance that all data captured and stored on the device can be deleted by the user at any time by deleting the app. The user can view details of their uploaded data.
7. **ANONYMITY ASSURANCE** State of the art de-identification and encryption technologies are used to ensure current and on-going privacy and confidentiality of user details.
8. **USAGE RIGHTS** Usage of data must be limited for COVID-19 contact tracing only by State and Territory health departments. No other agency or third party may have access to this data, which must be subject to oversight by an appropriate body (such as privacy regulator, the Office of the Australian Information Commissioner).
9. **LEGAL PROTECTION** Full legislative penalties and fines for any breach of the privacy guidelines, through data misuse or unauthorised access, modification or impairment.