

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 app¹ to aid in Australia's efforts to manage and suppress COVID-19.

As healthcare, technology and information professionals, we believe a secure and well-designed app, where its single purpose is to speed up contacting people exposed to COVID-19 to minimise the spread of the virus – is both a key part of an efficient public health effort and will build trust with the Australian people.

As advocates for information privacy and the data rights of consumers, we contend that the principle of 'first do no harm' should be applied to the implementation of health technology. The 10 principles below, if adopted as a matter of urgency, will increase the likelihood of widespread adoption of the app which is desirable for rapid contact tracing.

1. **COMMUNICATION TRANSPARENCY** Clear, specific, purposeful, transparent communication with the public is required, with full disclosure about what the app is for, how it works, how it is designed, any performance limitations or impacts to the user device, and clarity on governance including how the development and operation of the app will occur and how this will be monitored and independently audited. Communications must be 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 must be optimised for accessibility and multi-lingual support and be designed for inclusivity, including people with disabilities.
3. **MINIMUM DATA COLLECTION AND SPECIFIC SCOPE** Data collection must be the absolute minimum required for effective COVID-19 contact tracing. Scope creep beyond the purpose of the COVID-19 pandemic response must be specifically declared as unlawful.

¹ Australia's contact tracing app is called COVIDSafe.

4. **DATA SECURITY** Data must be stored and shared on secure servers located in Australia that meet the standards set by the Australian Signals Directorate. All data collected by the COVID-19 app must be destroyed after 21 days on a rolling basis. Legislative protections must ensure that no Australian data can be repatriated offshore to a foreign agency or government. The choice of data storage must leave no room for doubt about the ability of the Commonwealth of Australia to ensure that all citizen data remains only in this country.
5. **OPT-IN AND END DATE** Use of the app must be optional and the app should remind users on a regular basis that it is running in the background. There must be clear criteria for what will constitute end of life for the app and its removal from devices.
6. **USER CONTROL** There must be clear assurance that all data captured and stored on the device within the 21 day period, can be deleted by the user at any time by deleting the app.
7. **ANONYMITY ASSURANCE** State of the art deidentification and encryption technologies must be used to ensure current and ongoing privacy and confidentiality of user details.
8. **USAGE RIGHTS** Usage of data must be limited to State and Territory health department contact tracing for COVID-19. 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 must be enacted. Legislation must include disclosure of any breaches or attempts to breach.
10. **EVALUATION** Independent evaluation, both formative and summative, must be conducted and the results made public, to report back to the Australian people on the merit of the app, what is being achieved and any failings or lessons learned. Evaluation results to be used to inform pandemic policy and planning.

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