



WESNET
The Women's Services Network

**SUBMISSION RE:
VERIFIABLE
CREDENTIALS POLICY**

JULY 2026

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Acknowledgements

Acknowledgement of Country

Wesnet would like to acknowledge and pay respects to all First Nations people, as the Traditional and only Custodians of this country we call Australia. We recognise First Nations peoples' culture, wisdom, and connection to this land and pay our respects to Elders, past, present and future. We recognise the loss of land and culture, acknowledging the consequences of dispossession and colonisation on First Nations peoples. We acknowledge that sovereignty over this land was never ceded. This land always was and always will be Aboriginal land. First Nations women have multiple roles and identities relating to their culture, community, age, ability, sexual orientation and gender identity. Wesnet works tirelessly for an inclusive future free from violence. We acknowledge the strength and resilience of First Nations women, particularly those who have experienced domestic and family violence, and those who support and advocate for victim-survivors of domestic and family violence. We pay our deepest respects to those who have lost loved ones as a result of domestic and family violence. Wesnet will actively work to be informed by the experiences and advocacy of First Nations women, and to support First Nations women in their quest for safety and equality.

Acknowledgement of Victim-Survivors

Wesnet also takes this opportunity to acknowledge all victim-survivors of gender-based violence. We pay respect to those who did not survive and to their family members and friends.

About Wesnet

We are the Peak body for Specialist Women's Domestic and Family Violence Services in Australia.

Our vision is a future where all women and children live free of domestic and family violence and its consequences.

With almost 350 eligible members across Australia, Wesnet represents a range of organisations and individuals including women's refuges, shelters, safe houses and information/ referral services.

Harnessing its large national network of members and associate members, Wesnet plays an important role in identifying unmet needs, canvassing new and emerging issues, facilitating policy and sector debate and providing advice to government to provide improved responses to the problem of domestic and family violence. We do this within our communities, and in partnership with non-government stakeholders.

Wesnet works within a feminist framework which promotes understanding domestic and family violence as gendered violence, and that women's and children's experiences are also intrinsically shaped by their ethnicity, culture, ability, age, gender identity and class.



Consultation on verifiable credentials (VC) policy

Introduction

Wesnet welcomes the opportunity to provide a brief submission on the Australian Government's proposed verifiable credentials (VC) policies, issues and opportunities to strengthen public trust and confidence in VC. This submission emphasises holding a domestic and family violence (DFV) lens in designing VC policy. Our overarching feedback concerns the necessity of safety by design. We also offer remarks on specific proposed positions from the consultation paper titled *Proposed Commonwealth policy positions for the use of verifiable credentials*.

Safety by design

Designing Australia's future verifiable credentials to ensure victim-survivor safety and to minimise the possibility of misuse and weaponisation by people using violence will be paramount and should follow 'safety by design' principles.¹

VC policy must also place a positive duty on key roles such as issuers, verifiers and trust services to recognise the dynamics of DFV and design accordingly. There are common scenarios that victim-survivors experience in relation to identity documents and access to accounts. Commonwealth test use cases must consider circumstances where victim-survivors do not have physical and/or VC. These scenarios would include victim-survivors having shared devices with people using violence, people using violence controlling access to or damaging devices where VC are stored, victim-survivors leaving violent relationships without physical credentials, and people using violence withholding physical credentials from victim-survivors. We also know that people using violence often use a range of coercive control tactics that may intersect with VC and access to accounts and services.

In considering Commonwealth test use cases in each of the above examples, victim-survivors would require physical and/or VC and may need to have VC reissued, key information securely updated such as addresses, and/or access essential or services, such as MyGov changed or renewed.

¹ Bridget Harris, "Technology-enabled abuse: how 'safety by design' can reduce stalking and domestic violence," *The Conversation*, November 11, 2021, <https://theconversation.com/technology-enabled-abuse-how-safety-by-design-can-reduce-stalking-and-domestic-violence-170636>, and "Safety by Design," eSafety Commissioner, accessed July 2, 2026, <https://www.esafety.gov.au/industry/safety-by-design>.

It is well documented that separation from a partner is associated with increased risk of injury, disability or death due to DFV. Evidence shows that '[w]omen are most at risk of being killed or seriously harmed during and/or immediately after separation'.² In New South Wales, two-thirds of women victims who were killed by an ex-partner ended the relationship within three months of the murder.³ Use cases must take these circumstances into account to ensure that victim-survivors are not placed in danger and further disadvantaged in receiving essential and support services, including social security, if they do not have physical and/or VC. Lack of physical and/or VC should never compromise victim-survivors' access to social security entitlements and essential services.

Victim-survivor safety considerations

Considerations relevant to specific proposed policy positions include:

Proposed policy position	Considerations
<i>Issuers: B3 The identity proofing approach for issuing a VC should be proportionate to the Risk.</i>	The safety of the VC holder should guide issuers in assessing risk as part of their VC issuance processes. This can include scenarios where victim-survivors may need physical or VC reissued to access services that support safety and wellbeing or amended without the person using violence knowing, such as through notifications that may alert the person using violence to a new address, for example, that may compromise survivor safety. Issuers should consider DFV as a special circumstance. Identity-proofing processes need to be trauma-informed. For example, processes that require victim-survivors to retell their experiences of DFV or report to police can compound the impacts of trauma. Issuers should be skilled in

² Cherie Toivonen and Corina Backhouse, *National risk assessment principles for family and domestic violence* (Sydney: ANROWS, 2018), <https://www.anrows.org.au/research-program/national-risk-assessment-principles/>, p.12.

³ Cherie Toivonen and Corina Backhouse, *National risk assessment principles for family and domestic violence*, p.12. This figure is from reviews of intimate partner homicides between 2000 and 2014.



	providing trauma-informed support for victim-survivors.⁴ We provide two examples to illustrate how services are responding to victim-survivors. The first example is the minimum enforceable standards for the telecommunications (telcos) industry which provide a temporary ID exemption and does not require the victim-survivor to provide evidence of domestic, family or sexual violence. Under specific conditions set out in the Telecommunications Determination 2017, telcos can support a prepaid mobile service without conducting an ID check when a DFV service provides a service and handset, if an organisation believes the person is impacted by domestic, family or sexual violence, and collects their name and address, and the service is limited to 30 days, unless the Australian Communications and Media Authority approves a longer period.⁵ This would allow victim-survivors time to obtain physical or VC. The second example is for a person who is a primary victim of crime in Victoria who is eligible to apply for the Financial Assistance Scheme in Victoria. Although the crime must be reported to police, there are special circumstances where this does not apply, including DFV.⁶ The application
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⁴ 'Trauma-informed practice means integrating an understanding of past and current experiences of violence and trauma in all aspects of service delivery. The goal of trauma-informed systems is to avoid re-traumatising individuals and support safety, choice and control to promote healing'. The Federal Government, *National Plan to End Violence against Women and Children 2022-2032* (Commonwealth of Australia (Department of Social Services), 2022), <https://www.dss.gov.au/national-plan-end-violence-against-women-and-children/resource/national-plan-end-violence-against-women-and-children-2022-2032>, p.133.

⁵ Commonwealth of Australia (Australian Communications and Media Authority), Domestic, Family and Sexual Violence Standard: Industry guidance (Canberra, Melbourne & Sydney: Commonwealth of Australia (Australian Communications and Media Authority), 2025), https://www.acma.gov.au/sites/default/files/2026-01/Domestic%20Family%20and%20Sexual%20Violence%20Standard_Industry%20guidance.pdf.

⁶ "4.3 Special circumstances for not reporting," Victorian Government, accessed July 2, 2026, <https://www.victimsofcrime.vic.gov.au/financial-assistance-scheme-guidelines/reporting-violent-act-police/special-circumstances-not-reporting>.



	can show other evidence of DFV, such as a support letter from a specialist DFV service, family violence intervention order, records of stalking, that satisfies the criteria for special circumstances.
<i>Verifiers: C1 Verifiers should treat a verified VC as the equivalent of the respective physical credential.</i>	Wesnet tentatively welcomes this position, particularly given the digital divide.⁷ Data on digital exclusion shows that around one in five Australians are excluded or highly excluded and roughly one in ten (9.2%) are highly excluded. Rates of exclusion are much higher for people aged 75+ years (66.5%), those who did not complete secondary school (54.5%), public housing residents (45.2%) and First Nations people (40.9%).⁸ An intersectional lens is critical as survivors experience additional barriers to accessing services and specific DFV risk,⁹ and this proposed position can support victim-survivors who may only have access to physical credentials. However, proof of identity (POI) can be a barrier for members of diverse communities, such as migrant and refugee communities.¹⁰ Naming conventions can vary, such that credentials have

⁷ "Measuring Australia's digital divide," the ARC Centre of Excellence for Automated Decision-Making & Society at RMIT, the Centre for Social Impact Swinburne University of Technology, and Telstra, accessed July 2, 2026, <https://digitalinclusionindex.org.au/>.

⁸ "The 2025 findings," the ARC Centre of Excellence for Automated Decision-Making & Society at RMIT, the Centre for Social Impact Swinburne University of Technology, and Telstra, accessed July 2, 2026, <https://digitalinclusionindex.org.au/the-2025-findings/>.

⁹ Intersectionality is the concept used to understand how intersecting forms of power, privilege and discrimination, including ageism, homophobia and racism, impact communities. Kimberle Crenshaw introduced the concept to refer to sexism and racism experienced by Black women, and the concept has expanded to include additional forms of oppression and inequality. Kimberle Crenshaw, "Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory and Antiracist Politics," *University of Chicago Legal Forum* 1 (1989), <https://chicagounbound.uchicago.edu/uclf/vol1989/iss1/8/>. Delanie Woodlock, Karen Bentley, Darcee Schulze, Natasha Mahoney, Donna Chung, and Amy Pracilio, *Second National Survey of Technology Abuse and Domestic Violence in Australia* (Wesnet, 2020), <https://wesnet.org.au/2ndnatsurvey>. Wesnet, supported by the University New South Wales and Curtin University conducted a Third National Survey of Technology Abuse and Domestic Violence in Australia (Third National Survey). This survey builds on two earlier surveys in 2015 and 2020. The findings from the third national survey are forthcoming and also show specific risks to people from communities experiencing additional barriers.

¹⁰ "Identity documents for refugees," Refugee Council of Australia, accessed July 2, 2026, <https://www.refugeecouncil.org.au/identity-documentation/>.



	different spelling of names. Wesnet echoes Economic Justice Australia's position that 'VC policy should include measures to assist people to navigate inconsistencies of spelling and dates on POI and related documents to increase access to VCs.' Children and young people are victim-survivors in their own right. They may have left violent homes without physical or VC because the parent using violence controlled their devices or had their physical credentials. A child and young victim-survivors roundtable report found priority areas for government action, including accessible, easy-to-navigate and age-appropriate support options and solutions that are co-designed and co-developed with children and young people.¹¹ VC policy must include measures that align with these recommendations to support child and young victim-survivors. Lastly, we are concerned that despite the policy intention that a verified VC should be the equivalent of a physical credential, VCs and digital systems may become default, rather than opt-in, which would exacerbate the digital divide, leaving users, including victim-survivors, without options. Wesnet echoes Economic Justice Australia's position that 'strongly urges the Government to ensure its VC strategy funds pathways that support people with minimal or no POI to access identity documents through VCs where appropriate, and through alternative mechanisms where they cannot use VCs. Such funding is essential to ensure the VC framework does not deepen existing inequality and disadvantage'.
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¹¹ "Children and Young People Roundtable Summary Report," Domestic, Family and Sexual Violence Commission, accessed July 2, 2026, <https://www.dfsvc.gov.au/children-and-young-people-roundtable-summary-report>.



Privacy and consumer protection: F1 Applicable Australian laws establish privacy and consumer protections and obligations for the people, businesses, and other organisations that use VC.

We note that even though there are privacy and consumer protections and obligations, these have been breached in DFV circumstances and can compromise the safety and wellbeing of victim-survivors. For example, automated notification alerts should not alert people using violence to amendments to VC or physical credentials such as new location details.

Privacy breaches illustrate the lack of a DFV lens. Instances include:

- In 2021, the Australian Information Commissioner took action against Services Australia for disclosing a victim-survivor's new address to her ex-partner.¹²
- The Telecommunications Industry Ombudsman received 300 complaints from victim-survivors from 2022-2023.¹³ There are now minimum enforceable standards for the telecommunications industry.¹⁴ This includes developing and reviewing policies and procedures to support victim-survivors in consultation with the DFV sector, specialised training for public facing staff, and protecting the privacy and security of impacted customers' accounts and personal information.¹⁵

Wesnet emphasises the necessity of ensuring continuity in social security entitlements and essential services access for victim-survivors if

¹² "'WZ' and CEO of Services Australia (Privacy) [2021] AICmr 12 (13 April 2021)", Australian Information Commissioner, accessed July 2, 2026,

<https://www.austlii.edu.au/cgi-bin/viewdoc/au/cases/cth/AICmr/2021/12.html>.

¹³ "Better consumer protection rules are needed for telco consumers suffering from family violence," Telecommunications Industry Ombudsman, accessed July 2, 2026,

<https://www.tio.com.au/news/better-consumer-protection-rules-are-needed-telco-consumers-suffering-family-violence>.

¹⁴ "Telecommunications (Domestic, Family and Sexual Violence Consumer Protections) Industry Standard 2025," Australian Government Federal Register of Legislation, accessed July 2, 2026,

<https://www.legislation.gov.au/F2025L00664/latest/text>.

¹⁵ "Domestic, Family and Sexual Violence Standard – rules for industry," Commonwealth of Australia (Australian Communications and Media Authority), accessed July 2, 2026,

<https://www.acma.gov.au/domestic-family-and-sexual-violence-standard-rules-industry#obligations-for-all-telcos>.



	people using violence control use of physical or VC. An example of this issue is when survivors attempt to regain access to MyGov services after people using violence have revoked their access by changing details. Recovery processes to regain access are lengthy and compound trauma. This issue can be relevant for issuers and digital wallet providers. We suggest strengthening privacy and consumer protection with a DFV lens that considers comprehensive response to victim-survivors, including reporting mechanisms and processes.
<i>Privacy and consumer protection: F2 Issuers must not track the use of VC by individuals.</i>	Wesnet welcomes this position. Due to the prevalence of DFV, it is likely that issuers include people using violence who can abuse their positions and track victim-survivors.¹⁶
<i>Voluntariness and inclusion: G1 Where VC are adopted – whether as issuer or verifier – Commonwealth agencies should continue to offer alternative options both for people to obtain those credentials, as well as for people using credentials to access government services</i> <i>&</i> <i>G2 VC will provide a complementary digital option to existing channels for the delivery of government services, supported by existing inclusion pathways for</i>	These positions can be strengthened. It is critical that there are alternatives for victim-survivors to obtain credentials and for victim-survivors using credentials to access government services. Victim-survivors must also have a right to access services without physical or VC. We reiterate our position that special circumstances should include DFV. We suggest amending position G1 to state 'Where VC are adopted – whether as issuer or verifier – Commonwealth agencies must continue to offer alternative, proactive and genuine options both for people to obtain those credentials, as well as for people using credentials to access government services'. Existing inclusion pathways can also be improved to enhance access to services. As stated, recovery processes to access MyGov services after people using violence have revoked their access by changing details are lengthy and compound

¹⁶ Findings from the forthcoming national survey show that stalking co-occurs with technology-facilitated abuse in DFV.



<i>access to those services.</i>	trauma. We suggest amending position G2 to state ' <i>VC will provide a complementary digital option to existing channels for the delivery of government services, supported by existing improved inclusion pathways for access to those services</i> '.
<i>Security: IT Issuers, verifiers, wallet providers, and trust service providers should ensure appropriate security measures are in place for their systems.</i>	People using violence can vexatiously or nefariously use physical and/or VC against victim-survivors across all touch points. Each key role within the VC ecosystem can implement role-based access controls to improve the security of victim-survivors. Clearly outlined and consistent safeguards and processes must be in place, including checks for unauthorised access, use and sharing of credentials, and accountability for privacy breaches.

Final remarks

As Wesnet is an unfunded peak body, our capacity to make recommendations is limited. At the same time, we thank the Australian Government for the opportunity to contribute to the VC policy to ensure it is safe for victim-survivors of DFV.