Parliamentary Section

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Meeting Brief MB20-001621 Version (1) Date sent to MO: 20/05/20

To: **Minister Hunt**

Minister H	unt	Dat	e:21,5,2020
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Contact Officer:	Daniel Keys	First Assistant Secretary, Informa Technology Division	ation \$ 22
Clearance Officer:	Charles Wann	Deputy Secretary	s 22

Date / Time: 10.30am, Thursday 21 May 2020

Location:

Traditional Custodians:

Purpose: To discuss Apple's health roadmap in Australia

Key Attendees/Speakers:	Title:	Organisation:	Mobile No:
s 47F		Apple Inc.	
		and the	

Key Matters:

The Department has worked with Apple Inc. to release a number of mobile apps through their iTunes platform, including the Coronavirus app which had over 3.6 million downloads and COVIDSafe which has over 5.8 million downloads.

To maximise uptake, the Department requested Apple feature the COVIDSafe app in their app store to increase visibility however this request was not initially actioned by Apple.

Health and the DTA are working in partnership with Apple to understand and embed the native contact tracing functionality under development by Apple into the COVIDSafe app. Apple and the DTA have been collaborating well with acknowledgement that Australia is leading the world in the practical use of technology for contact tracing.

Apple's Exposure Notification Framework

The proposed Exposure Notification Framework (ENF) under development by Apple will enforce a distributed data model to maintain privacy. The voluntary nature of this approach will limit its applicability in the Australian context given the role of the states and territories and Public Health Officials.

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The United Kingdom have raised concerns regarding the applicability of the distributed design with Apple and have stated that the framework is of limited use in its current form.

Our initial assessment has revealed that adopting the ENF within the COVIDSafe app will require significant redesign of the approach to contact tracing. Issues including:

- The framework does not support a centralised repository of identified users that can be managed by a central authority. It relies on individuals managing their own close contacts and initiating an interaction with government.
- The COVIDSafe App would need to be completely redesigned and rebuilt. The ENF cannot simply be embedded into the current COVIDSafe app as it has currently been developed due to the lack of access to low level Application Programming Interface (API) in the framework.
- Push notifications are the primary mechanism to notify close contacts. Notifying
 close contacts through an app-based notification may cause alarm if not managed
 properly.
- Public Health Officials would not have centralised visibility over the contacts under the ENF and would instead rely on individuals initiating a close contact based on a push notification received from another user.
- A new Privacy Impact Assessment (PIA) would need to be conducted and legislative amendments may be required if the framework was to be adopted.
- ENF supports less backwards device compatibility compared to our current system which needs iOS version 10 or above. It is only compatible with iPhone 6 or later that are running iOS version 13.5 or above (only around 15% of current users are on OS 13.5).

For the ENF to be beneficial to Australia, the framework should be modified to allow access to the underlying API's that allow countries to utilise native functions of the operating system to improve app performance within their existing business processes.

The ENF will be available towards the end of May but will be of limited use in its current form. A comprehensive assessment is currently being developed by the DTA to inform decision making.

The major benefit of ENF is the promised Bluetooth connectivity improvements which may improve the accuracy of the current app's approach to Bluetooth connectivity. While Apple have represented significant improvements to Bluetooth operation, we have been unable to validate Improvement claims. The ability to test Bluetooth performance is a challenge as this information is not available in a way that can be easily consumed and validated.

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Attachment A

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Information on Apple's health strategy: February 2019

This past year the company announced its first two [US] Food and Drug Administration (FDA) clearances including a De Novo clearance for a built-in Apple Watch ECG feature that went live in December 2018. It also announced numerous hospital partners for Apple's Health Records initiative, including, most recently, the [US] Department of Veterans Affairs. inh e ink, look mankind ha. And in interviews, CEO Tim Cook hasn't downplayed Apple's health efforts. On the contrary, in January he told Mad Money's Jim Cramer "I do think, looking back, in the future, [you'll say] Apple's most-important contribution to mankind has been in health."

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