NATIONAL
IDENTITY
SECURITY
STRATEGY

IMPROVING THE INTEGRITY OF IDENTITY DATA: RECORDING OF A NAME TO ESTABLISH IDENTITY

Better Practice Guidelines for Commonwealth Agencies – June 2011

IDENTITY SECURITY

Acknowledgements

While all reasonable care has been taken in the preparation of this publication, no liability is assumed by the Commonwealth of Australia for any error or omission.

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1. Executive Summary

Government is the primary issuer of identity credentials in Australia. While the primacy of a person's name as a personal identifier may be challenged in the future, as identity management changes from paper-based documents to digital / electronic identity data, a person's name is currently the primary identifier of their identity. Increased consistency and uniformity across Commonwealth agencies in use of name rules and practices will strengthen Australia's identity management system, and reduce risks to national security and protect public revenue.

Variation and inconsistency in name-based records among agencies jeopardises public revenue, and facilitates identity-associated crimes, such as identity theft and fraud, or other criminal or terrorist activity. Increased consistency in collecting and amending name/s identity records will improve the integrity of agency records and improve confidence in the accuracy and reliability of agency data holdings.

This paper outlines best-practice guidelines to improve consistency and accuracy in use of name as an identifier by Commonwealth agencies. Developing better practice guidelines for use of name requires balancing the interests of individuals and those of government in establishing and maintaining a secure identification regime. Ensuring identifying personal information records are complete and accurate is not only important to agencies. It is also of significant personal importance to individuals. As such, individuals should have access to convenient methods to establish and verify their identity, and to correct errors or amend records.

The practices outlined in these guidelines seek to balance the operational requirements of different agencies, with best practice principles that aim to increase consistency and uniformity in use of name policy and procedures. While the focus of these guidelines is use of name, many principles can also be applied to other biographical details.

These Guidelines complement the 2009 publication on Data-Matching by the Attorney-General's Department that set out 17 principles aimed at assisting government agencies to adopt better practice in data matching, with a view to improving the integrity of identity data.[1] The Guidelines are designed as a best practice reference guide for government agencies on name policy, procedures and naming conventions. Both guidelines are consistent with AS4590 'Interchange of Client Information' which set out standards for data formatting.

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[1] At http://www.ag.gov.au/www/agd/rwpattach.nsf/VAP/(8AB0BDE05570AAD0EF9C283AA8F533E3)~Data+Matching+Guidelines+updated+15102010+RC.pdf/$file/Data+Matching+Guidelines+updated+15102010+RC.pdf

2.   The Six Principles

This paper argues for a principles-based approach by Commonwealth agencies to use of name and naming conventions to invest greater consistency and integrity in Proof of Identity (POI) credentials. Best practice principles to use of name policy and procedures and naming conventions include:

- **Principle 1**   Record name information shown on a commencement of identity document linked to identity
- **Principle 2**   Collect all available name information
- **Principle 3**   Preserve names in full
- **Principle 4**   Collect and retain historical biographical details
- **Principle 5**   Retain an audit trail of amendments to records
- **Principle 6**   Regularly replace government-issued POI documents or cards

3.   Background

In 2007, the Council of Australian Governments (COAG) agreed to develop and implement a National Identity Security Strategy (NISS) in response to a revised assessment of Australia's identity management system. COAG endorsed the development and implementation of the NISS in the *Inter-Governmental Agreement to a National Identity Security Strategy* (IGA), which provides a framework for inter-governmental cooperation to strengthen the integrity of Australia's identity security in key areas, including high-integrity enrolment of identity when establishing new POI documents, and strengthening the security standards of POI documents to decrease tampering or copying.

In addition to the NISS, a POI framework was endorsed by the Standing Committee of Attorneys-General in 2004.

The prime focus of the POI framework is to ensure a rigorous process of identification and verification is used by agencies for documents that could be used for a POI purpose.

The POI Framework is outlined below.

Proof-of-Identity Framework

Commencement of identity	A person's identity commences in Australia: ▪ at birth with the names recorded on a birth certificate, or ▪ if the person is not born in Australia, the names recorded on the relevant Department of Immigration and Citizenship (DIAC) certificate
Linkage between identity and person	Linking a unique physical characteristic to a person, such as a photo or other biometric, establishes a verifiable link between name and identity. Examples are: ▪ Australian passport ▪ State/Territory drivers' licence ▪ Foreign passport
Evidence of identity operating in the community	Individuals establish a *social* footprint through interactions with government, business and other individuals. A range of identity documents can verify a person's use of name in the community, including: ▪ Commonwealth-issued credentials (eg., Medicare card, Centrelink card/s, Dept of Veterans' Affairs card/s, etc) ▪ State/Territory-issued documents (eg marriage certificate, change of name certificate) ▪ Credit card or account card issued by a financial institution in Australia
Evidence of residential address	▪ Utilities notice (power/water) ▪ Rent details

POI credentials fulfil three key purposes:

1. To facilitate accurate, prudent and responsive provision of benefits, services, management of assets and accounts, and collection of revenue.

2. To achieve national security objectives in the areas of:

    ▪ border security through identification of persons and property entering and leaving Australia

    ▪ preventing and responding to serious crime and terrorism, and

    ▪ protecting critical infrastructure, such as air and sea ports, rail and telecommunication networks.

3. To verify an individual's claim to an existing identity:

    ▪ POI documents enable individuals to verify they are who they say they are, and assist in restricting others from misusing or stealing their identity. Individuals have a right to expect that government-issued and private organisation-issued documents, such as passports, drivers' licences and credit cards, should provide a reliable and secure means to verify their identity, and

    ▪ For the private sector, POI documents facilitate commercial uses in meeting customer needs, minimising risks and meeting legislative obligations.

POI credentials comprise both government-issued credentials as well as information holdings among private sector organisations, such as banks and credit reporting companies. In Australia, both the public and private sectors rely on the same approach to verify an individuals' identity, which requires an individual to produce or disclose:

    ▪ something that they **know** (such as a password or PIN)

    ▪ something that they **have** (such as a POI document or card), or

    ▪ something related to **who** the individual is (such as a photo or other biometric).

Agencies and organisations vary in the number and type of credentials they require to verify an individual's identity, depending on the degree of risk associated with the service or benefit provided by a particular transaction.

4.   Australia's identity system

Australia's system of identity management comprises a dispersed, federated network of POI credentials issued by both government and private sector organisations. Commonwealth and State/Territory governments have, by tradition, a primary responsibility to establish and maintain a robust identity management system that serves both national needs, such as national security and economic interests, but also the needs of individuals to be able to interact with others in confidence.[2] As an issuer of POI credentials government enables individuals to verify they are who they claim to be.

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[2] These interests are not unique to Australian governments. The Council of Europe, through the formation of the Group of Specialists on Identity and Terrorism have developed recommendations to address identity security issues that include: (i) strengthening document security and issuing procedures, especially in

While government does not have a monopoly on issuing POI documents, its role in creating a secure identity management system in Australia is fundamental. Government is solely responsible for commencing a person's identity, through issuing a certificate at birth or migration to Australia, and is solely responsible for declaring an end to identity, through issuing a death certificate.

A key strength of Australia's identity management regime is its federated framework, which comprises many POI documents, cards or other credentials, issued by numerous agencies. Each POI credential supports a function of the issuing agency. Variation in the operational purpose/s for issuing POI credentials has resulted in differing degrees of integrity applicable to particular POI credentials, with inconsistencies across agencies in the rigour of the policy and procedures relied on when collecting information or changing personal information details after a record has been established. This recognises the individual's right to amend personal information held by government if they believe the information is inaccurate, incomplete or out of date.

5.   Identity and name

Identity and name are closely-aligned concepts. A person's identity is generally considered to be established at birth with the creation of an Australian Birth Certificate that details unique information about an individual – name, gender, date and place of birth, and parents' details.[3] Each Australian State and Territory 'Births, Deaths and Marriages' (BDM) Registrar has legislative responsibility to register or record information about births, as well as adoptions, deaths, marriages, changes of name and reassignments of gender.

For people not born in Australia, identity is established from personal details recorded on the relevant DIAC certificate.

A person's name is widely accepted by international standards to be one of four primary personal identifiers: the others being gender, nationality and date of birth.[4] Within Australia, widely-accepted primary personal identifiers include name, date of birth, address and more recently, biometrics (eg digital photograph).

AS4590 – Interchange of Client Information – provides a list of person name attributes – 'family name', 'full name', 'given name', 'name suffix' (including honours or awards), 'title' and 'usage type' (includes 'also known as' or aliases, such as a maiden name). While AS4590 can assist agencies to standardise the recording of name data, it cannot overcome a number of intractable problems and difficulties.

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verifying the identity of individuals, (ii) the creation or development of systems which allow identity checks with reference to civil status records/registers (iii) non-acceptance of birth certificates, on their own, as evidence of identity (iv) encouraging member states to exchange relevant information and experiences and adopt or develop effective systems of registration for change of name/nationality, marriage, divorce or death, and (v) all domestic changes of name/s be recorded in appropriate registers. See http://www.coe.int/t/dlapil/codexter/4_Theme_Files/Identity_documents/default_en.asp

[3] In European tradition, a person's birth name (as recorded on a birth certificate) continues into adulthood, with possible changes (due to adoption or marriage). In some cultures, however, a birth name is only a childhood name, rather than the default choice for later life.

[4] See the United Nations' International Civil Aviation Organization (ICAO), which sets standards and recommended practices to facilitate border-crossing procedures for international civil aviation.

Names are rarely unique. There are many possible variations on a name - for example, Mohammed, Muhammad, Mahomed, Muhomad, Mohammed, Mohumad. Some names are so widely used that variations are common. For example, Lee is the second most commonly used surname within Korea. Some variations on Lee are Yi, Yee, Rhee, Rhe, Rhi, Ri, Le, Leigh, Li.

Complexity can also be added by transliteration methods[5]:

- there are several official and unofficial Korean transliteration methods in use

- there is no official transliteration method for Arabic names, and

- there are three contemporary but different official transliteration methods for Chinese names, with many others being used historically.

The inconsistent use, error, amendment or deliberate falsification of names means it can be difficult if not impossible to uniquely identify a person by name at a given point in time, or track the identity of the same person over time. An inability to verify the identity of a person based on name data inevitably lowers confidence in the integrity of client records stored by agencies.

6.   Preferred name/s

Individuals are usually able to exercise wide discretion to choose to use different name/s to support different aspects of their identity. In addition to being a primary means for an individual to be identified by others, a name also constitutes an important component of a person's self-identity.

A pseudonym or preferred name may be based on any number of individual preferences, including a derivative of a name (eg 'Liz' rather than 'Elizabeth'), use of initials, a middle name, alias, or pseudonym. A person from a non-English speaking background may adopt an Anglicised name for use as part of their social identity. The same person may have multiple on-line identities; each tailored to a specific context. A name used in a chat room, may be different to that used to buy goods on-line.

Australian citizens or permanent residents are legally entitled to commence using a 'preferred' name at any time without formal process. Australian citizens retain a common law right to a change of name through usage or repute:

> *At common law an adult may assume any surname by using such name and becoming known by it. A surname is not a matter of law but a matter of repute … The law of this country allows any person to assume and use any name, provided its use is not calculated to deceive and to inflict pecuniary loss.[6]*

The right of Australians to choose to use a preferred name or pseudonym, or to be anonymous, is in practice, not absolute. In certain circumstances, individuals have limited options to use a preferred name or to be anonymous. For example, to apply for a government-issued passport, or a bank-issued credit card, a person must use name/s that establish their identity, and provide POI

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[5] Words imported from one language to another (using a different alphabet).
[6] New South Wales Law Reform Commission, *Names: Registration and Certification of Births and Deaths*, Report No 61 (1988).

documents to verify their claimed identity. POI documents provide documentary evidence of a person's identity, including full name.

As such, in practice, the *right* to use a preferred name is limited by processes that require documentary evidence of a person's name that verifies their identity, including any changes of name. For example, under the *Australian Passports Act 2005* (s53(3)), a passport can only be issued in a name recorded on a birth certificate issued by a State/Territory BDM Registry, a BDM-issued marriage certificate, a BDM-issued change of name certificate, or a citizenship document. Registration of a 'formal' change of name involves application to and approval by the relevant State/Territory BDM Registrar.

Perhaps the most important factor in individuals' choice of use of name is the need to establish trust and confidence in their interactions with others. Anonymity, or a preferred name or pseudonym, may be appropriate in many interactions among individuals, and between individuals and business or government. But, the higher the need for trust and confidence, such as in higher value commercial transactions or government-issued identity credentials, the less choice individuals usually have to use a preferred name. This is not to suggest that use of a pseudonym or preferred name is antithetic to establishing trust and confidence. It is to recognise that trust is not an absolute, but a continuum: at one end are interactions where anonymity may be appropriate, while at the other end, interactions that require high levels of trust and confidence in the identity of the person participating in the interaction

7.   Changes of name

There are approximately 50,000 formal changes of name registered with State and Territory BDM Registries in Australia each year.[7] In 2006, it was reported that more than 100,000 people in Australia began calling themselves something new.[8]

A person's claim that they have changed their name/s should be verified by documentary evidence that establishes a link between the 'old' identity and the person's 'new' name/s. Individuals seeking to record a formal change of name should be asked to provide POI documents that support the change of name. Options are:

- If the person was born in Australia:
  - an amended birth certificate issued by a State/Territory BDM Registry
  - a BDM-issued change of name certificate
  - a BDM-issued marriage certificate. A marriage certificate issued overseas is not acceptable as a change of name document in Australia
- If the person was born outside Australia:
  - a re-issued DIAC certificate (where an error was made on the original DIAC document)
  - a BDM-issued change of name certificate
  - a BDM-issued marriage certificate. A marriage certificate issued overseas is not acceptable as a change of name document in Australia

Changes involving minor typing errors, missed letters, obvious transcription mistakes or other departmental error/s should be dealt with directly without the need for further supporting documentation.

No formal process, in addition to the issuance of a marriage certificate, is currently required for persons who change their name following marriage. The most common scenario is a female adopting her husband's last name. A marriage certificate is also accepted as evidence of the hyphenation of one or both last names.

Many individuals maintain POI credentials in both their pre-married and post-married names. For example, some women choose to retain their pre-marriage identity in their professional life and adopt their post-marriage identity in their private and social lives. Upon separation or divorce a person may legally, without formal processes, resume their pre-marriage name.

Commonwealth, State and Territory agencies assign differing values to marriage certificates. For example, the Department of Foreign Affairs and Trade (DFAT) only accept Australian BDM-issued marriage certificates as evidence of a change of name following marriage. Marriage, de-facto relationships, divorce or separation also present numerous policy and procedural issues in relation to use of name and children.

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[7] Data supplied by Council of Australasian Registrars (COAR) in 2011.
[8] Kim Sweetman, 'Love thy name', *Courier Mail* (Brisbane), 5 September 2006, 27.

8. Common terminology

A number of terms are common across agencies, while in some cases different terms are used to describe the same or similar activities/functions. Adopting common terminology should enhance the consistency and integrity of agency data holdings. Suggested terms are:

Change of name	▪ A person's identity is formally changed only by a process of applying to a State/Territory BDM Registry ▪ Each State/Territory BDM has legislative responsibility to register or record change/s of name
Commencement of identity document	▪ A commencement document establishes a person's identity ▪ Australians' identity commences with: - a birth certificate issued by a State/Territory BDM Registry, or - if not born in Australia, a citizenship certificate/document issued by the Dept of Immigration and Citizenship (DIAC)
Family name	▪ A family name is a person's last name or surname. The ordering of family and given names varies among cultures. Some cultures do not recognise a 'family' name; the last name is usually adopted as a family name.
Given name/s	▪ Given name/s include combinations of first name/s, forename, Christian name/s, middle name/s, second name/s
Preferred name	▪ A preferred name, or pseudonym, is based on individual preference/s, and may be used to support a person's personal or social identities. One person could use many preferred names ▪ A preferred name could include both family and given name/s

9. Recording name details

Agencies have obligations under the *Privacy Act 1988* concerning the handling of personal information.[9] It is essential that agencies are able to rely on the integrity of the personal information they collect, store, use and disclose. A person's claim to a particular identity is currently, and will continue in the foreseeable future, to be based primarily on a person's name. A person's claim to use a particular name must be based on a documentary link.

Ensuring high integrity enrolment of individuals for government services or benefits is a high risk process. Error/s can have long-lasting and negative consequences. Information collected must be:

- accurate – the spelling of names and other details must be correct

- complete – details of full name/s and other relevant information should be recorded to establish as unique a record of each individual as possible

- up-to-date – procedures should ensure personal details are as up-to-date as possible

- verifiable – a claim to a particular identity must be verified by POI documents.

The Gold Standard Enrolment Framework (GSEF) contains a set of standards to ensure applicants for key POI credentials are subject to rigorous identification procedures at the time of enrolling for a government benefit or service. A gold standard approach assists Commonwealth agencies to ensure greater consistency in establishing a client's identity, thereby improving the integrity of key POI documents. Steps in the GSEF process include (i) evidence to identify an applicant for a service/benefit, (ii) verification of POI credentials, (iii) interviewing an applicant, and (iv) collecting a biometric (eg., photo).

Once a person's identity has been established to a gold standard, individuals should be treated as a 'known customer' in future interactions. Known customers should be:

- subject to verification procedures to confirm the person's identity against the information supplied at enrolment, and

- able to use an existing key POI credential, which has been issued as a result of a gold standard enrolment, to streamline future enrolments for other government benefit/s or service/s. For example, an existing Australian passport holder could use their passport to streamline a future enrolment for a new key POI credential.

Traditionally, a name is a person's strongest claim to identity. But, a name is not unique. Two or more people can have exactly the same name. There are known to be several hundred 'twins' in Australia who have the same name and birth date.

Leaving aside errors (such as missing letters, extra letters, and name order variations), a person may be known by more than one name depending on context:

- a married and maiden name

- a professional name

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[9] As defined in section 6: *personal information* means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

- a preferred name or alias, or

- an Anglicised version of a non-English name.

Following are principles for collecting, recording and maintaining robust practices for use of name.

Principle 1: Record name/s information shown on a commencement of identity document linked to identity

There are only two sources of commencement of identity documents in Australia:

- a Birth Certificate issued by a State or Territory Births, Deaths and Marriages (BDM) Registry, if the person was born in Australia; or

- a Citizenship certificate issued by the Department of Immigration and Citizenship, if the person was not born in Australia.

A person's *full name/s* as it appears on the relevant commencement of identity document should be collected. Recording name/s in full as they appear on the commencement of identity document is the least risky decision because it links the person to an identity recorded on a formal government-issued credential.

Any deviations or changes from the name/s as they appear on the commencement document should be substantiated by formal documentation of a change that has been issued by a State or Territory BDM (see 'Change of name' below).

Individuals who have difficulty in supplying their commencement of identity document, formal change/s of name document/s, or other POI credentials, should be subject to additional checks that confirm the individual's identity. Ensuring relevant identity document/s are supplied is important to verify a person's identity through high integrity POI processes.

A 'preferred' name/s must not be recorded in place of a person's full name/s as they appear on a formal identity credential. An alias, previous or preferred name/s should be recorded in a data field that is distinguished from name/s linked to identity.

Principle 2: Collect all available name information

Names are generally not unique. As such, all known name information should be recorded to create as unique a record of each individual as it's possible to achieve. This would include the recording of an alias, preferred or previous name which may improve the chances of identifying an individual.

A person's full name usually includes a number of words. International standards for travel documents specify that a person's name should comprise both primary and secondary identifiers, and include their whole name, including given first and middle name/s and family name.[10] Care should be taken to clearly distinguish a person's family name from other given name/s.

In western tradition, a person's name typically comprises three parts: two given names and a family name. Not all cultures use a typical 'western' three-word name. Assumptions should not be made about naming conventions when recording a person's name/s; information should always be confirmed directly with the person and verified from a commencement document to ensure accuracy.

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[10] International Civil Aviation Organization (ICAO) Document 9303 and International Organization for Standardisation (ISO) SC17.

Some different conventions that apply to names in many non-western cultures include:

- a single word name (eg., in some Indonesian and indigenous cultures)

- a number of words with no family name (eg., some Burmese cultures)

- combinations of family name and other family identifiers.[11]

Guidelines for name recording conventions are outlined in the next section.

Collecting middle name/s and/or middle initials is very beneficial to confirm identity. Middle name/s are particularly useful in establishing identity where a person has married or changed their family name. Collecting preferred names or aliases is also beneficial to confirm identity. A simple example illustrates the benefits of more name information to uniquely verifying a person's identity. The name 'Ann Smith' is less uniquely identifying than 'Ann Elizabeth Smith'. Identifying the *correct* Ann Elizabeth Smith can be done more quickly and accurately if the agency's records also show other name details, such as a married name, or a preferred name of 'Annie'.

A record keeper is obliged to check the accuracy of any personal information it uses and must establish procedures to keep the information up-to-date.[12] The extent to which information is kept up-to-date would vary depending upon the use for which the personal information is put.

Once a record keeper has possession of personal information it must have regard to the ability to disclose it. Authorised disclosures (for a secondary purpose) include consent, that disclosure is necessary to lessen a threat to life or health, or if authorised by law.[13] Care must be taken to protect both the integrity and confidentiality of personal information in order to reflect the rights of the individual to whom the information belongs.

Principle 3: Preserve names in full

Record *all* name/s in full as they appear on the commencement of identity document. Abbreviate name/s selectively to preserve as much individual uniqueness as possible (see details below). Where space is limited, record family name in full as much as possible; abbreviate given name/s in preference to abbreviating family name.

Non-alphabetic characters (including hyphens, spaces and apostrophes), prefixes and suffixes can add unique details to names, and should be recorded as accurately as possible.

Principle 4: Collect and retain historical biographical details

Historical personal details include any information that is not current. This includes a previous family name/s, which may have changed due to marriage, a preferred name, and previous address information.

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[11] For example: The naming conventions as they would appear in a national passport used in those parts of the world where Arabic-based names are common are as follows: *Name 1* is the individual's first name, *Name 2* is the name of the individual's father, *Name 3* is the name of the individual's grandfather and *Name 4* is the individual's family name.

[12] Information Privacy Principle 8 in section 14 of the *Privacy Act 1988*.

[13] Information Privacy Principle 11 in section 14 of the *Privacy Act 1988*.

For changes of name, record the 'new' name but keep a record of the 'old' name details wherever possible. Where databases permit, a preferred name/s or pre-married name/s, should be recorded in a separate field as <u>additional</u> information to assist to verify a person's identity.

Name inconsistencies may exist following a change of name as agencies are progressively advised of any change/s and update their records. Ensuring historical name information is retained in agency databases following a change/s, assists to establish a person's identity where variation may exist in an individual's current information. Retaining a record of historical name and address data, as well as current details, provides a greater potential to confirm identity than would be the case if only current details are available.

Other biographical data that is beneficial to verify a person's identity include gender, date of birth, and postcode.

Principle 5: Retain an audit trail of amendments to records

An audit trail is a record from the initial creation of a person's information record and each subsequent action, such as change of name. An audit trail provides a history of transactions/contacts over time. Commonwealth agencies are subject to the provisions of the *Freedom of Information Act 1982* and the *Privacy Act 1988* to amend or annotate personal information records.[14]

It is the personal information *record* held by the agency, and not the paper-based document or card issued by the agency, which is the foundational record of identity. Where possible, if a record is amended, the amendment should be made in such a way that the text of the record as it existed prior to the amendment is not obliterated.

Principle 6: Regularly replace government-issued POI documents or cards

An option to improve the integrity of data holdings over time is for agencies to periodically re-issue credentials and undertake regular mail-outs to up-date records. A related issue is the surrender of the current (and subsequent to a change, out-of-date) document to the issuing agency prior to a new (up-dated) identity document being issued.

10. Name recording conventions

Adopting consistent conventions when recording name and other biographical information allows agreed formats for name/s (family and given name/s) to be standardised across agencies, which reduces inconsistencies and errors in personal records stored within agencies and improves the integrity of agencies' data holdings.

Assistance with handling different naming conventions that are used in many cultures is available from 'A Guide to Ethnic Naming Practices', issued by Centrelink.

Variations that occur in all names, regardless of cultural origins, include spelling, typing and phonetic error, synonyms and aliases, Anglicization and foreign versions of names, initials, truncation and

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[14] Further guidance on the amendment and annotation of personal records under the FOI Act is provided in Part 7 of the FOI Guidelines issued by the Australian Information Commissioner at http://www.oaic.gov.au/publications/guidelines.html

abbreviation, prefix and suffix variations, compound names, missing letters or words, extra letters or words, and word sequence variations. Examples of these variations are listed in **Attachment A**.

Suggested naming conventions to improve the integrity of identity records include:

10.1 Family and given names

A person's family name is perhaps the most valuable single item of information that establishes identity. Where possible, a family name should be recorded in full. Given names may include one, two or any number of names that are additional to family name.

Family names, in a traditional 'western' sense, do not exist in all cultures. An attempt to apply strict 'westernised' rules will lead to assumptions that will result in error/s from person to person and culture to culture. For example, a Burmese person's name is made up of two or three names. When a Burmese name is westernised, the last name is usually used as a family name.[15] But this 'rule' may not apply in all cases. Do not make assumptions about conventions that may apply in individual cases based on understandings of broader cultural conventions.

Non-alphabetic characters found in family and given names, including hyphens, spaces and apostrophes *should not* be removed. Examples: O'Brien should be entered as is; Burke-O'Hara should be entered as is.

It is important not to drop prefixes or suffixes as these can be important unique identifiers.

10.2 Multiple names

Many individuals maintain POI credentials in multiple names, including both pre-married and post-married family name/s, as well as preferred given name/s or aliases. For example, using the name recorded on their commencement of identity document in their professional life and adopting a post-marriage identity in their private and social lives.

Where known, any preferred name/s or pseudonyms, should be recorded, preferably in a separate field. Examples of preferred names include use of:

- a derivation of a full name. For example, Vicky / Vicki ~ Victoria; Jim ~ James; Geoff /Jeff ~ Geoffrey / Jeffrey; Judy ~ Judith; John / Johnny ~ Jonathan; Liz / Beth ~ Elizabeth

- an Anglicised name/s (eg., Tony ~ Antonio)

- initials (eg., 'BJ' ~ Brian John)

- a middle name (eg., Paul ~ Edward Paul)

- an alias is a preferred name based on individual preference. An alias may or may not be derived from variation/s of a person's identity. For example, aliases for John include: Johnny, Johnno, Jack, Jock and Hank.

10.3 Name order

As a person's name is generally made up of several parts, the order in which those parts are arranged can be significant. The order used in European tradition is given name/s followed by family-name; this is commonly known as the 'western order'. The 'eastern order' (used by many cultures in

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[15] Centrelink's 'A Guide to Ethnic Naming Practices'.

Africa, Asia and Central Europe) is family name followed by given-name/s. The order of names should be checked before they are recorded.

Adoption of the best practice guidelines to reflect this naming convention in relation to given and family names, not only in the recording order of names but in the establishment of systems that enable the individual to be addressed correctly, will promote consistency, reducing the likelihood of error. This is particularly important for the recipient.

10.4   Name Length

Agency's computer systems vary in the number of characters that can be recorded, which may result in the need to shorten, or abbreviate, a person's family and/or given name/s. As a general rule, name/s should be entered in full, where possible.

Cultural conventions should guide decision-making on shortening or abbreviating name/s. Where cultural conventions are not applicable, truncate name/s from the right for either family or given name/s until the name/s fit the available space.

First and second given name/s should be recorded in full as much as possible. Subsequent given name/s may be shortened or abbreviated to initials where space prevents full recording. *Do not* omit a name or initial wherever it is possible not to.

10.5   Titles

As a general rule, titles should be recorded, where space permits. A title should be omitted to allow name/s to be recorded in as much detail as possible. See AS-4590 for a list.

11.   Conclusion

Government has the primary role of ensuring individuals can accurately verify they are who they claim to be. A person's identity commences with a government-issued credential that records identifying information, including the person's full name. While the primacy of a person's name as a personal identifier may be challenged in the future, as identity management changes from paper-based documents to digital/electronic identity data, a person's name is currently a primary identifier of identity.

Other strategies to improve the integrity of identity records held by Commonwealth agencies include standardising titles, name length and abbreviations, and undertaking data matching activities to identify excess and out-of-date records.

Attachment A

12. Examples of variations in name data

		Name Data Entered	*Correct Name*
1.	Alternate spelling	Stuart	Stewart
2.	Letters out of order	Hakcett	Hackett
3.	Words out of order	Tun Lye Aun	Aun Tun Lye
4.	Typographical spelling	Mengan	Megan
5.	Fused words	SaraAnn	Sara Ann
6.	Split words	De La Hunty	Delahunty
7.	Missing letters	Clark	Clarke
8.	Extraneous letters	Johnsson	Johnson
9.	Transliteration	Saker	Sakhr
10.	Multiple errors	D L Grand	De La Grande
11.	Incomplete words	Chris	Christine
12.	Extraneous information	rfkj Harris dhg	Harris
13.	Incorrect or missing punctuation	Julie-Anne	Julianne
14.	Data fields interchanged (first & last names in wrong order)	Lee Robert	Robert Lee