

# Digital Licence Project health-check

## Internal Audit Report

November 2023

Released under RTI - DTMR



# Control sheet

<b>Division</b>	Customer Services, Safety and Regulation (CSSR)	
<b>Branch</b>	Customer Services	
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The internal audit was conducted in adherence to The Institute of Internal Auditors' Mandatory Guidance including the definition of internal auditing, the Code of Ethics and the International Standards for the Professional Practice of Internal Auditing.

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### **Internal Audit Report – Digital Licence Project health-check**

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# 1. Executive summary

## Background and context

The Digital Licence Project is developing a digital licence, which will provide a safe and convenient digital option for Queenslanders to validate their identity. The Digital Licence app allows Queenslanders to store their driver licence, marine licence and/or photo identification card easily and securely on their mobile devices.

The digital licence was trialled in the Fraser Coast region (Hervey Bay and Maryborough) from March to September 2020. During this time, residents from the Fraser Coast used the Digital Licence at over 100 local participating businesses and organisations. The current phase of the project has expanded the trial to Townsville and included improvements from the Fraser Coast trial. The aim of this phase is to test the readiness for a state-wide rollout.

## Objectives and scope

As per the approved 2022-23 Internal Audit Plan, a review of the Digital Licence Project was undertaken. The objective of this high-level health-check was to evaluate the project's governance structure, reporting mechanisms, timeliness, quality, financial considerations, and cybersecurity resilience.

Refer to **Appendix A** for further information on the scope and approach for this review and **Appendix B** regarding the key stakeholders interviewed.

## Conclusion

No apparent barriers to the state-wide rollout of the Queensland Digital Licence have been identified, with the trials in the Fraser Coast region and Townsville being a success with positive feedback from customers and key learnings acquired for a state-wide rollout.

However, medium and low risk-rated improvements were observed relating to areas of internal communications in training, external communications in customer expectation management, compatibility challenge between the project team and Information Technology Branch (ITB), a missing project-specific customer service

Key Performance Indicator (KPI), and timeliness of key project documentation updates.

In addition, close monitoring and preparedness for increased demand for customer support is recommended to unknown factors relating to the rate of uptake and potential onboarding difficulties. This will ensure that especially during the early stage of state-wide rollout any issues are promptly addressed, and positive public perception of the Digital Licence is maintained.

**Appendix C** contains a table documenting Internal Audit's assessment of key risks and associated controls, as identified in this review.

## Positive observations



### Positive observation 1

Significant amount of assurance work has been performed to strengthen the cyber-security resilience, including penetration testing, advanced cyber security assessments, and ethical hacking program.



### Positive observation 2

Project management demonstrated active leadership and readiness to take on challenges. For example, in managing the macro-economic risk of a hyper-inflation, management initiated a negotiation with the main vendor to restructure the service contract by indexing the "Pricing Schedule" to a less price volatile term, "Wage Price Index", instead of originally "Customer Price Index" which was later found to be an effective step in mitigating the adverse impact on the service cost to complete the remaining phases of the project.



### Positive observation 3

The project team prototype-tested the solution across different stages of software development, collecting and validating the feedback and incorporating into the next version. Notably, this process was conducted also with Vision Australia and other disability stakeholder groups to validate accessibility and user experience of the Digital Licence. Moreover, overwhelmingly positive feedback and learnings were collected from customers in both pilot sites.



### Positive observation 4

The Digital Licence Project delivers an important milestone related to "Digital Government", "Digital Customer" and "Digital Market" as per the Queensland's Digital economy strategy<sup>1</sup>. Additionally, the project is supporting the local technology sector through use of Queensland-based companies, such as Code Heroes and Aliva.



### Positive observation 5

A robust sense of ownership and accountability were observed from members working in the project, interviews, and an anonymous staff survey, indicating an effective governance structure and a healthy team culture.

## Key issues / opportunities

	Low	Med.	High	Extreme	BPI
1 Improvements in handling and escalation of customer onboarding issues.		•			
2 Customer expectations regarding Digital Licence cross-jurisdictional interoperability and risks related to ISO certification timeframe should be better managed		•			
3 Continued focus on harmonising different product development methodologies is needed.		•			
4 Average wait time and demand for a "live-person chat" should be monitored and proactively managed during the state-wide rollout.	•				
5 Key project documentation should be updated in a timely manner.	•				
<b>TOTALS</b>	<b>2</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>

Refer to **Section 3** for information regarding issue and opportunity ratings.

Released under the Information Privacy Act 2009

<sup>1</sup>[https://www.chde.qld.gov.au/\\_\\_data/assets/pdf\\_file/0018/34407/digital-economy-strategy.pdf](https://www.chde.qld.gov.au/__data/assets/pdf_file/0018/34407/digital-economy-strategy.pdf)

## 2. Report on a page

Details of issues and recommendations are outlined in **section 3** below.

### Report on a Page - Digital Licence Health-check



Conclusion		Observations and recommendations			
<p>Overall, the health-check found no apparent barriers to the state-wide rollout of the Queensland Digital Licence.</p> <p>Several improvements were identified relating to the areas of:</p> <ul style="list-style-type: none"> <li>Internal communications in training</li> <li>External communications in customer expectation and risk management related to ISO certification timeframe</li> <li>Compatibility challenges between the project team and Information Technology Branch (ITB)</li> <li>Missing project-specific customer service KPI</li> <li>Delays in updating key project documentation</li> </ul>		Observations	Summary of Recommendations		Success factors
MEDIUM	Improvements in handling and escalation of customer onboarding issues	IV	<ul style="list-style-type: none"> <li>Customer service staff receive continual training regarding Digital Licence onboarding, troubleshooting and escalation processes</li> <li>Digital Licence Training Plan is updated and communicated</li> <li>Further requirements for expansion of the acceptable identity documents are monitored</li> <li>A triage process is implemented at the point of receiving a manual QDI registration uplift request by frontline staff</li> <li>An official internal process is developed for handling documentation when customers are asked to scan and email identity documentation</li> <li>Actions to minimise customer confusion between Queensland Digital Licence (QDI) and QGov are undertaken</li> </ul>		C D E
MEDIUM	Customer expectations regarding Digital Licence cross-jurisdictional interoperability and risks related to ISO certification timeframe should be better managed	VI	<ul style="list-style-type: none"> <li>Appropriate actions are taken in regard to Gate 4 Assurance Review Report Recommendation 5</li> <li>A roadmap for ISO certification of the Queensland Digital Licence is formalised</li> <li>A formal risk-based approach is agreed relating to independent information security reviews whilst working towards ISO certification</li> </ul>		B B
MEDIUM	Continued focus on harmonising different product development methodologies is needed	VI	<ul style="list-style-type: none"> <li>A plan aimed at resolving compatibility challenges relating to different product development methodologies is formalised</li> <li>A communication process between the project team and ITB to enable seamless information sharing is formalised, specifically where there are foreseeable impacts across the teams</li> </ul>		A C
LOW	Average wait time and demand for a "live-person chat" should be monitored and proactively managed during the state-wide rollout	VI	<ul style="list-style-type: none"> <li>A Digital Licence specific KPI for a "live-person chat" is considered for the purpose of demand and capacity management, particularly for handling onboarding issues during the early stages of state-wide rollout</li> <li>Enhancement of the "live-person chat" service is considered in terms of managing customer expectations of wait times based on usage frequency and customer demand for the service</li> <li>A response plan for handling increases in capacity demands for customer support is agreed and finalised before the state-wide rollout</li> </ul>		B B C D
LOW	Key project documentation should be updated in a timely manner	VI	<ul style="list-style-type: none"> <li>Key project documents such as Benefits Realisation Plan (March 2021 version) are reviewed on a regular basis, in line with Recommendation 6 in the Gate-4 assurance report</li> <li>Change and Release Management Processes &amp; Procedures (version August 2020) is updated in consultation with ITB</li> </ul>		E C

**Positive Observations**

- Observation 1** Significant amount of assurance work was observed over cybersecurity resilience
- Observation 2** Management demonstrated an active leadership to take on challenges of hyperinflation and service cost increase to the project budget
- Observation 3** A focus on customer experience validation and feedback was observed during the Fraser Coast and Townsville trials
- Observation 4** A strategic alignment with the Queensland's Digital economy strategy and the prevailing Queensland Government policies of bringing in local employment and positive impacts to the state
- Observation 5** A motivated team culture with a robust sense of ownership and accountability

**Benchmarking to the five factors for Delivery of Successful Technology Projects** (QAS 18/19 practice guide)

Five success factors

- Senior leaders actively lead and challenge
- Projects align with business outcomes
- Internal and external teams
- Skills and capacity to match the challenge
- Learnings are identified and acted on

**Key controls assessment**

Control Expectations

- I Managing customer expectation for a cross-jurisdictional interoperability and an ISO18013 certification with an aligned public messaging
- II Key project documentation should be timely updated, particularly the business case and benefit register
- III Risk of inflation and service cost increase impacting project budget are managed by contract and/or budget management measures
- IV Key learnings, incl. customer feedbacks and the Gate-4 recommendations, are incorporated into the process of delivering the "end product"
- V Adequate testings on cybersecurity vulnerabilities to protect sensitive data and to build up a preparedness to respond to data breaches
- VI Roles and responsibilities are clearly defined to ensure that internal and external teams are working towards the same outcomes
- VII Project outcomes are strategically aligned with prevailing Government policies

## 3. Details of issues / opportunities

### Issue and opportunity ratings

Issues identified during an internal audit review are categorised into Extreme; High; Medium; and Low risk as per the [risk assessment and ratings matrix](#) in the [TMR Risk Management Framework](#). The matrix is used by TMR as part of a formal framework for addressing and managing risk, with organisational involvement dependent on the level of risk. A business process improvement (BPI) opportunity is principally focused on improving the effectiveness, efficiency, or economy of an existing business process. BPI opportunities are rated based on the benefits that they are expected to deliver if implemented, in accordance with the [opportunity assessment and ratings matrix](#) published on the Risk Management Tools and Techniques page on *insideTMR*.

### COSO control components

The [Internal Control – Integrated Framework](#) issued by the [Committee of Sponsoring Organizations of the Treadway Commission](#) (COSO) is recognised as a leading framework for designing, implementing, and conducting internal control, and assessing the effectiveness of internal control. The Framework:

- recognises that organisational structures vary from informal to clearly defined
- groups organisational objectives (what an organisation seeks to achieve) as:
  - *Operational* – relates to the effectiveness and efficiency of operations, including performance and financial goals, and safeguarding assets against loss.
  - *Reporting* – relates to internal and external financial and non-financial reporting and may include reliability, timeliness, transparency, or other aspects addressed by regulators, recognised standard setters, and the organisation's policies
  - *Compliance* – relates to adherence to laws and regulations applicable to the organisation.
- sets out five integrated components of internal control, namely: Control Environment; Risk Assessment; Control Activities; Information and Communication; and Monitoring.

Each issue noted below identifies the relevant COSO control component.

### Behavioural drivers

Behavioural drivers are factors that influence the behaviour of employees, forming the climate (culture of an organisation in the present moment) of an organisation. Strong behavioural controls can influence employees to behave ethically and in line with an organisation's objectives. Internal Audit uses a methodology based on behavioural studies to categorise behavioural drivers that can positively or negatively impact the organisational control environment.

The methodology categorises behavioural drivers as: Clarity, Social Cues, Engagement, Achievability, Transparency, Speak-up, and Consequences (details of the drivers are provided in **Appendix D** of this report).

Application of the methodology facilitates analysis of the drivers underpinning undesirable behaviours in an organisation. With improved understanding of those drivers, the actions developed to address the root causes of hard control failures are more likely to result in long-term resolution of the associated issues.

Issues rated as *Medium* and above are assessed for the key behavioural root cause considered to be facilitating the breakdown of the relevant hard control.

## 1. Improvements to the handling and escalation of customer onboarding issues

MEDIUM

### Observations

*What did Internal Audit find?*

*COSO component*

**CONTROL ACTIVITIES**

Customer service training is an essential process that is needed for a successful state-wide rollout of the Digital Licence. Awareness of up-to-date processes and guidelines by the frontline customer support staff is critical to enhance support experience and customer satisfaction. To deliver a great customer service, training programs and materials should be updated regularly, especially when there are frequent changes to service offerings that may impact customers.

A summary of the main points of the deficiencies that could impede a smooth Driver Licence uptake process for customers is included below, with a more detailed account of this observation provided within **Appendix E**.

#### 1. Handling of alternative Secondary Identification documents and staff training:

- a) Inability to complete the onboarding process when secondary identification document(s) could not be provided leading to a delay in onboarding and confusion about the process.
- b) Deficiency in staff and local management training or awareness related to requirements for alternative identification documentation and/ or escalation process.

#### 2. Communication:

- a) Confusion between different Queensland Digital Identity platforms. There is a notable similarity between QGov and Queensland Digital Identity (QDI) that has a potential to cause poor customer experience. Lack of a well-documented and communicated escalation process and a clear guidance for support officers may result in incorrect or contradicting guidance provided to customers.
- b) Update to the Digital Licence Training Plan is required. This document is missing some of the key Government partners, such as officers working with Safe Night Precinct.

Remedial actions by the project management were taken since our discovery of the QDI onboarding issue, including a review of the escalation guidelines and consultation with Smart Service Queensland (SSQ), the QGCDG unit responsible for QGov website, about advice provided to customers trying to register for QDI. We were also advised that Australian citizenship and name change documents will be included as secondary documents for identity verification prior to the state-wide rollout.

These actions, when implemented, should improve the efficiency and effectiveness of the process, mitigate risks of poor customer experience, and safeguard against potential negative media and reputational consequences.

### Behavioural root cause analysis

*What is the primary behavioural root cause of the issue?*

Clarity - Expected behaviours are not clearly and consistently stated in policies/ procedures with aligning supporting documentation/ tools.

### **Implication(s)**

*Why is this a risk/ opportunity?*

1. A lack of manual uplift options and/ or escalation process for customer going through QDI onboarding process can result in poor customer experience, potential negative media coverage, and reputational consequences.
2. Failure to keep the training plan up to date with key government partners can result in communication issues, poor customer experience, as well as a potential negative media coverage.
3. Confusion between QDI and QGov identity providers can result in communication issues, negative customer perception of the Queensland Government digital services and potential negative media coverage.

### **Recommendation(s)**

*What are the suggested actions to address this risk/ opportunity?*

It is recommended that the Executive Director (Digital Licence Program) ensures that:

1. Customer service staff receive continual training regarding Digital Licence onboarding, troubleshooting and escalation processes.
2. Digital Licence Training Plan (version June 2022) is updated and communicated to stakeholders.
3. During the early stages of the state-wide release phase further requirements for expansion of the acceptable identity documents are monitored.
4. A triage process is implemented at the point of receiving a manual QDI registration uplift request by frontline staff. As part of this process, it is suggested that a list of pre-approved alternative documentation and escalation process is made available to frontline staff.
5. An official internal process is developed for handling documentation when customers are asked to scan and email identity documentation for manual verification process.
6. Actions to minimise customer confusion between Queensland Digital Identity (QDI) and QGov are undertaken.

## Management response(s)

What will management do to address the risk/ opportunity?

Extension consultation and information has been provided to Customer Services Branch to ensure readiness to support customers both during the pilot phase and in the lead up to state-wide release. This includes:

- Accelerate training modules developed and available for all TMR staff (including CSB staff) to complete.
- Regular communications, working group meetings and leadership meetings to keep operational staff and CSB leaders informed on the project's progress and support materials.
- Comprehensive information and guides have been published in TIPPs and KAOS for CSB staff to access.
- SSQ engaged to support overflow of calls and support requirements.

In response to the above recommendations, please note the below points and corresponding key actions.

1. Contact Centre staff have been reminded of escalation paths and internal help systems have been updated to more clearly reflect this.
2. The training plan from 2022 has been updated with the opportunities that were presented during the pilot roll out to reflect current status of training for key government partners.
3. Since the audit was conducted, additional documents have been added to the QDI signup process and more identity documents are planned to be incorporated in the QDI post state-wide release. This will enable more of the Queensland population to opt-in to the Digital Licence with ease.
4. Response times for customer contact is different depending on where a customer query is raised. If a customer query is directly through the Digital Licence web pages (in the body of the page itself) the query comes direct to the Digital Licence team and is responded to within a 48hr period. If a customer was to use the header or footer of these pages or place an enquiry through a QGov page the response time is also 2 days if contact details have been submitted. Should a customer submit an enquiry through a TMR web page the standard response time is 15 days.
5. The DLA project leverage the existing CSB process for the storage and retention of documents as part of the step up process where customers email additional identity documents to establish their identity. These processes meet document privacy considerations.
6. The CIDM or QGov identity platform is at end of life and discussions are occurring to transition these digital identities to the newly created QDI developed for the Digital Licence. A response to questions on the two Queensland Government Digital Identities has been prepared and will be included on the Digital Licence website.

## Action owner(s) and due dates

Who will deliver the action(s), and by when?

**Action 1.1** Ongoing monitoring of call centre responses and customer feedback will continue through roll out and life cycle of project.

Jason Latimer – 31/01/2024

**Action 1.2** Training plan has been updated to reflect the new opportunities that were actioned during the Townsville roll out.

Kellie McGowan – 10/10/2023 (Completed)

**Action 1.3** Additional documents will be added to the QDI over time.

Kaylene Berndt - 31/01/2024

**Action 1.4** Training document reflects triage process.

Kellie McGowan – 31/10/2023

**Action 1.5** DLA Project leverages the CSB document retention and destruction processes to maintain privacy. A section on document deletion will be added to the DLP procedures.

Kaylene Berndt – 30/09/2023 (Completed)

**Action 1.6** DLA website updated to communicate that the QDI is different to the QGov Identity.

Kellie McGowan – 30/09/2023 (Completed)

2. Customer expectations regarding Digital Licence cross-jurisdictional interoperability and risks related to ISO certification timeframe should be better managed

MEDIUM

**Observations**

What did Internal Audit find?

COSO component

**CONTROL ACTIVITIES**

Managing customer expectations is crucial to the success of the Digital Licence Project. An effective communication strategy delivers a clear and consistent message setting appropriate customer expectations that are aligned to project deliverables.

The International Organisation for Standardisation (ISO) is an independent, non-governmental international organisation with a membership of 169 national standards bodies that brings together experts to share knowledge and develop voluntary, consensus-based, market relevant International Standards that support innovation and provide solutions to global challenges. The Queensland Digital Licence App is promoted as being compliant with ISO18013-5 standard<sup>2</sup> which positively raises its reputation and sets an expectation of a high-quality product that is secure and able to be used around Australia and overseas within jurisdictions that comply with the same standard.

Being compliant to the ISO generally means that technologies and processes are designed, implemented, and tested to conform to the standard. It is important to note that this process does not include independent verification, which is the intent of ISO certification. Because this ISO is relatively new, and still in development, and in accordance with management's advice there is only one organisation offering certification service world-wide, the management's view on performing a certification at this stage of the project is not economical and/ or viable.

During the review no roadmaps for achieving interoperability across jurisdictions could be sourced. Also, there was no evidence of formal agreements with other states on a common interoperability approach. From interviews with the project management team, it was noted that a Commonwealth-led working group will soon be formed to address cross-jurisdictional interoperability of mobile Digital Licence.

The messaging on the Digital Licence app page<sup>3</sup> is lacking in detail relating to ISO compliance which creates a perceived expectation of high level of assurance to general observer not aware of a subtle difference between ISO compliance and certification. Whilst this may not be relevant for general public, internally TMR's senior management should determine and accept a risk of having the Digital Licence in public domain that has not been yet independently assured (certified), in particular concerning the Section 9 of the ISO which stipulates requirements for Security Mechanisms

Whilst this is not considered to be a barrier to the state-wide release, an under-delivery of customer general expectations may lead to customer disappointment, negative media coverage and reputational consequences. Moreover, the feature of an interoperability is generally expected which has been repeatedly reinforced in the minds of customers. Aside from the Digital Licence app web page<sup>4</sup>, which communicates a clear message that "you will also be able to use your Queensland Digital Licence around Australia"; this was covered by media including the coverage of the 2022 ISO Interoperability Test Event<sup>5</sup> where both TMR and Thales (the key vendor) leaderships had emphasized the message of commitment to delivering Australia's first globally interoperable Digital Licence to Queenslanders.

<sup>2</sup> <https://www.iso.org/standard/69084.html>

<sup>3</sup> <https://www.qld.gov.au/transport/projects/digital-licence/about#standards>

<sup>4</sup> <https://www.qld.gov.au/transport/projects/digital-licence/about>

<sup>5</sup> <https://www.thalesgroup.com/en/countries-asia/australia/news/thales-australia-and-new-zealands-digital-identity-team-demonstrates>

### **Behavioural root cause analysis**

*What is the primary behavioural root cause of the issue?*

Clarity - Lack of clarity in meeting public expectations regarding Digital Licence inter-jurisdictional interoperability

### **Implication(s)**

*Why is this a risk/ opportunity?*

1. Failure to implement a past learning, such as recommendation 5 from Gate 4 Assurance Review Report<sup>6</sup> related to cross-jurisdictional interoperability can result in failing to meet customer expectations, cause reputational damage, and generate negative media coverage.
2. Having no current ongoing independent review (ISO certification) exposes the department to unknown and/ or untreated risks, particularly in relation to Digital Licence security.

### **Recommendation(s)**

*What are the suggested actions to address this risk/ opportunity?*

It is recommended that the Executive Director (Digital Licence Program) ensures that:

1. Appropriate actions are taken in regard to Gate 4 Assurance Review Report Recommendation 5 relating to development of a cross-jurisdictional interoperability roadmap with other states.
2. A roadmap for ISO certification of the Queensland Digital Licence is formalised.
3. A formal risk-based approach to performing independent information security reviews, such as cyber security assessments, penetration testing, ethical hacking, and other any other relevant actions are undertaken to continually assess and appropriately mitigate against evolving cyber security risks and threats whilst working towards ISO certification.

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<sup>6</sup> Refer to Appendix F

**Management response(s)**

*What will management do to address the risk/ opportunity?*

In December 2022, the Queensland Government and Austroads co-hosted an mDL Interoperability Test Event in Brisbane. The Interoperability test event showcased the broad global support for the International Standard for mDLs. Eighteen global vendors including Google, Microsoft, Samsung, Thales, NEC, HID, Panasonic and Scytales all attended with products that were built to the standard. The Queensland Government successfully tested its Digital Licence and Verifier app against these vendors, demonstrating the benefits of a globally interoperable mDL solution. Apple has also built an ISO IEC 18013-5 compliant wallet and participated in the previous Interoperability test event in the USA. As such, there is no need for an independent assessment as suggested.

There is also a project being led by Austroads to establish an Australian or Australasian Verified Issuer Certificate Authority List. This is a master list of trusted issuing authorities who have developed an ISO compliant mDL. Austroads will then look to share this trust list with other issuing authorities and Relying Parties, helping to ensure that the Queensland Digital Licence can be used in other jurisdictions that also recognise the ISO.

The department's messaging will make it clear that persons travelling interstate or overseas should check with the jurisdiction they are travelling to, or through, on whether they will accept a digital licence, or whether they also need to carry their physical licence. It will not be incumbent on TMR to maintain a list of potentially thousands of jurisdictions that will or won't accept the digital licence.

**Action owner(s) and due dates**

*Who will deliver the action(s), and by when?*

**Action 2.1** Digital Licence team members will continue to work on cross jurisdictional working groups to influence the take up of the ISO and interoperability.

Michelle Haywood – 31/10/2024

**Action 2.2** Thales (the vendor) are contractually required to obtain ISO certification once the requirements are published to the open market.

Michelle Haywood - 31/10/2024

**Action 2.3** The project team continue to conduct security and penetration testing in line with best practice.

Neil McCaffery – 31/10/2024

### 3. Continued focus on harmonising different product development methodologies is needed

MEDIUM

#### Observations

What did Internal Audit find?

COSO component  
**CONTROL ACTIVITIES**

The Digital Licence app is developed to work in conjunction with microservices architecture<sup>7</sup> and Application Programming Interfaces (APIs)<sup>8</sup> which provide mechanisms to link with the department's licencing system. The management, development, and support of the app is planned to be transitioned to the Information Technology Branch (ITB) upon closure of the project that has been planned for 2025.

The Digital Licence app development is based on agile methodology that involves breaking the project into phases and emphasises continuous collaboration and improvement. This methodology focuses on a value-driven approach, individual and customer interactions, and responding to change and consumer demand. In contrast, the development of a significant government licencing and registration platform generally follows a waterfall delivery methodology which is used by the Information Technology Branch (ITB) and focuses on a plan-driven approach, moving through software development life cycle phases, with one phase being completed before another can start, hence the testing phase is separate and follows a build phase.

As part of this engagement, Internal Audit conducted an anonymous staff survey with the Digital Licence Project team. Several responses indicated a compatibility challenge due to different methodologies used. Some of the responses to "What is the most challenging aspect of working on this project?" were:

- *Because this is an agile and dynamic project using new technologies and delivery methods, working with TMR cultures that are built around traditional waterfall project delivery methods is a daily battle.*
- *We spend much effort clearing ITB roadblocks.*

Through further discussions it became evident that ITB staff working on the Digital Licence Project faced similar compatibility challenges from their standpoint. Differences between Digital Licence app product development methodologies, change and release management processes, suitability of existing ITB-managed standardised controls and support processes, and visibility of backlogs and data structures have been identified as areas that require improvements.

#### Behavioural root cause analysis

What is the primary behavioural root cause of the issue?

Alignment/ engagement – standards and expected behaviours are not aligned between the project team and ITB

<sup>7</sup> <https://microservices.io/>

<sup>8</sup> <https://en.wikipedia.org/wiki/API>

### Implication(s)

*Why is this a risk/ opportunity?*

1. Use of competing product methodologies may cause issues during the transition from project delivery into operational phase and pose a potential barrier in future application operation and development.
2. Delays in the Digital Licence app change and release management may lead to disruptions in operation, customer dissatisfaction and reputational damage.

### Recommendation(s)

*What are the suggested actions to address this risk/ opportunity?*

It is recommended that the Executive Director (Digital Licence Program) ensures that:

1. A plan aimed at resolving compatibility challenges relating to different product development methodologies is formalised.
2. A communication process between the project team and ITB to enable seamless information sharing is formalised, specifically where there are foreseeable impacts across the teams.

### Management response(s)

*What will management do to address the risk/ opportunity?*

1. DLP is recognised as one of the first departmental “pathfinders” using contemporary technologies and ways of working. CSSR is standing up a new Domain Centric Delivery Life Cycle (DCDLC) based on the DLP delivery model which will be overseen by a Customer Value Realisation Office (CVRO) that has Director, Registration and Licensing ITB as a representative. This DCDLC caters for parallel streams of work using both contemporary and legacy technologies and their associated system development lifecycles.
2. A number of communication forums have been established to ensure bi-directional information sharing and alignment:
  - a) Fortnightly IMPS/ DLP meetings: a running confluence page is used to cover off information updates, tasks, challenges and opportunities.
  - b) Monthly ITB Director/ DLP meetings: a formal PowerPoint pack, with an action log, is used to ensure Director and Executive Director level communication. This meeting is chaired by Director, Customer & Business and facilitated by Program Manager, DLP
  - c) Weekly Apps Mgt and Digital Delivery Director catch ups: a one-on-one session between the two directors whose teams have most of the ITB/ DLP day to day interactions, using a Planner Board

### Action owner(s) and due dates

*Who will deliver the action(s), and by when?*

**Action 3.1** A new Domain Centric Delivery Life Cycle (DCDLC) will be stood up to cater for parallel streams of working using both contemporary and legacy technology lifecycles.  
Neil McCaffery – 31/03/2024

**Action 3.2.1** Meetings with ITB to continue as planned and currently in action.  
Neil McCaffery 30/09/2024

**Action 3.2.2** DLP to draft a transition out plan for ITB.  
Neil McCaffery – 30/06/2024

#### 4. Average wait time and "live-person chat" demand should be monitored and proactively managed during the state-wide rollout

LOW

##### Observations

*What did Internal Audit find?*

*COSO component*

**CONTROL ACTIVITIES**

A Key Performance Indicator (KPI) is a performance measurement designed to evaluate a specific activity that creates an analytical basis for decision making and help focus attention on what matters most. A Specific, Measurable, Attainable, Relevant, and Time-Bound (SMART) KPI helps in determining how well the customer service team is performing, and whether additional resources are needed to maintain the level of service and to meet a predefined business objective.

The current average wait time for a "live-person chat" is presently skewed by non-business-hours during weekends. If used correctly, this indicator can serve as an effective indicator of increased demand and provide a trigger for allocation of extra resources.

It is acknowledged that under the current arrangements a KPI for a "live-person chat" is managed by the Customer Service Branch (CSB), however the existing "live-person chat" KPI should be evaluated to determine if it is relevant to the Digital Licence Project KPI set by project management in preparation for the state-wide release of Queensland Digital Licence. For example, the measurements for a "live-person chat" demand during QDI onboarding process may be defined differently to the general customer support queries which form part of the current KPI.

A case of substantial and sudden increase in customer demand for a "live-person chat" during a state-wide release has been considered. However, a response plan is still being explored and options, such as details related to handling of overflow queries by Smart Service Queensland, are yet to be presented to the Board.

##### Behavioural root cause analysis

*What is the primary behavioural root cause of the issue?*

Clarity – the expected behaviour in customer service (a KPI for customer wait time for a "live-person chat") is not clear enough.

##### Implication(s)

*Why is this a risk/ opportunity?*

In the absence of a Digital Licence specific KPI for a "live-person chat" customers may have to wait a long time using this service, particularly when issues are encountered during the QDI onboarding process, resulting in poor customer experience and negative media coverage.

##### Recommendation(s)

*What are the suggested actions to address this risk/ opportunity?*

It is recommended that the Executive Director (Digital Licence Program) ensures that:

1. A Digital Licence specific KPI for a "live-person chat" is considered for the purpose of demand and capacity management, particularly for handling onboarding issues during the early stages of state-wide rollout.

2. Enhancement of the "live-person chat" service is considered in terms of managing customer expectations of wait times based on usage frequency and customer demand for the service.
3. A response plan for handling increases in capacity demands for customer support is agreed and finalised before the state-wide rollout.

<b>Management response(s)</b> <i>What will management do to address the risk/ opportunity?</i>	<b>Action owner(s) and due dates</b> <i>Who will deliver the action(s), and by when?</i>
<ol style="list-style-type: none"> <li>1. There are no KPI's in place for live person currently in CSB however, there is a full review underway in the TMR contact centre for 'bot' interactions and further incorporation of statistics on bot usage. The Digital Licence Team will be considered in these advancements.            Note: Abandonment in the bot may be positive abandonment due to query being resolved. Bot conversations are also monitored to gather learnings and understanding of common queries.</li> <li>2. Live person messaging will be in place for State-wide release of the Digital Licence to help manage the volume of customer enquiries and demand for service.</li> <li>3. SSQ support arrangements are in place to manage the overflow of inbound phone and message enquiries from customers for a limited Hypercare period.</li> </ol>	<p><b>Action 4.1</b> DL Project to maintain visibility of live chat review and work with CSB to establish KPIs for this service.            Director, Change - Ongoing</p> <p><b>Action 4.2</b> Project team will continue to work with CSB to refine messaging and ensure it is addressing customer's needs.            Director, Change - Ongoing</p> <p><b>Action 4.3</b> Overflow of calls for support to be handled by SSQ. Negotiations on this approach is in progress.            Director, Change by mid-October 2023</p>

Released under RTI

## 5. Key project documentation should be updated in a timely manner

LOW

### Observations

*What did Internal Audit find?*

*COSO component*

**CONTROL ACTIVITIES**

Key project documents should be updated on a regular basis to make sure that key business outcomes are fulfilled, milestones are met and to provide a traceability concerning what has been done, who has done it, and when it has been done. Apart from providing an accurate and complete picture to project management of the project's progress, an up-to-date project documentation is essential for communicating and managing expectations to external stakeholders, including customers and business partners.

From the review of key project documents, it was evident that some of the key documents, such as Benefits Realisation Plan, Business Case and Change and Release Management process documents have not been updated in a timely manner. It is acknowledged that documents are currently under review, however the absence of a scheduled review mechanism between regular intervals was observed. Discrepancies in document completeness were also identified when compared to a more up to date project progress documents recorded in an official roadmap approved by the Board in September 2021.

### Behavioural root cause analysis

*What is the primary behavioural root cause of the issue?*

Clarity – an expected behaviour (a timely update mechanism of key project documentation) has not been clearly communicated.

### Implication(s)

*Why is this a risk/ opportunity?*

1. Stakeholders may rely on outdated versions of key project documents resulting in inaccurate and/ or incomplete perception of the Digital Licence Project, including making misinformed decisions.
2. Close collaboration between the project team and ITB on updates to the Change and Release Management Processes & Procedures will enable smooth transition from the project phase into operation.

## Recommendation(s)

*What are the suggested actions to address this risk/ opportunity?*

It is recommended that the Executive Director (Digital Licence Program) ensures that:

1. Key project documents such as Benefits Realisation Plan (March 2021 version) are reviewed on a regular basis, in line with Recommendation 6 in the Gate-4 assurance report<sup>9</sup>.
2. Change and Release Management Processes & Procedures (version August 2020) is updated in consultation with ITB.

## Management response(s)

*What will management do to address the risk/ opportunity?*

1. The benefits plan is updated and sent to CSSR at the request of PPO. The benefits register was required to be updated due to e-Correspondence being removed from the scope of the Digital Licence Project by the Project Board, thereby removing the cashable benefits from the project.
2. Business case is under refresh and is required to be updated for stage 3, which is post state-wide go live. This is currently in progress and will rely on the outcomes of agile epic roadmap prioritisation work to be agreed with the Board in late September/ October.
3. The Change and Release Management process is still relevant to the next release, but some minor updates will need to be made. The Change and Release process will be provided as part of the transition out plan.
4. Joint TMR-Thales Change & Release Management is updated regularly in Confluence as part of the Project Implementation Plan (PIP). This has been provided and runs for the duration of program stage 3.

## Action owner(s) and due dates

*Who will deliver the action(s), and by when?*

**Action 5.1.1** Update of Benefits register due to removal of e-Correspondence

DLP PMO Manager – by 29 September 2023

**Action 5.1.2** Update of the business case to include prioritisation of stage 3 deliverables and updated resource plans.

DLP PMO Manager - TBA

**Action 5.2.1 and 5.2.2** Update of the Change and Release Management Process

Director, Digital Delivery – by 6 October 2023

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<sup>9</sup> Refer to Appendix F

# 4. Appendices

## Appendix A: Terms of Reference

Department of Transport and Main Roads (TMR)

### Internal Audit Terms of Reference – Digital Licence Health-check

#### Background

The Digital Licence Project is developing a Digital Licence, which will provide a safe and convenient digital option for Queenslanders to validate their identity. The Digital Licence app allows Queenslanders to store their driver licence, marine licence and/or photo identification card easily and securely on their mobile devices.

The Digital Licence was trialed in the Fraser Coast region (Hervey Bay and Maryborough) from March to September 2020. During this time, residents from the Fraser Coast used the Digital Licence at over 100 local participating businesses and organisations.

The next phase of the project expanded the trial to Townsville and included improvements from the Fraser Coast trial. The aim of this phase is to test the readiness for state-wide rollout.

#### Review objectives

The objective of this high-level health check is to evaluate the project's governance structure, reporting mechanisms, timeliness, quality, financial considerations, and cybersecurity resilience.

#### Key risks

There are no risks specific to Digital Licencing recorded in the Enterprise Risk Management (ERM) system, however the following are relevant to the delivery of the project:

- Readiness of the Digital Licence app and supporting services and technologies for state-wide rollout and transition to business as usual.
- Ineffective governance structures leading to poor decision-making, lack of accountability, and conflicts among project stakeholders.
- Inaccurate or untimely reporting resulting in effective monitoring and communication of project progress, leading to misunderstandings and delays in addressing issues.
- Delays in project activities and milestones resulting in missed deadlines, increased costs, and potential dissatisfaction among stakeholders.
- Insufficient quality control measures that may result in deliverables that do not meet the required standards, leading to rework, customer dissatisfaction, and potential project failure.
- Inadequate measures to protect sensitive data, and preparedness to respond to data breaches. Inadequate testing of various scenarios resulting in undiscovered vulnerabilities, errors, or insufficient preparedness for unexpected events.

#### Approach

- Review the Gate 4 Assurance Review Report issued February 2023 to inform the next appropriate project assurance activity in the light of upcoming state-wide release.
- Confirm the following project aspects: business case adherence, project reporting, governance, quality, time, and budget including sufficiency of funds to complete remaining phases/ releases.
- Confirm previous recommendations and learnings are being adopted or addressed.
- Review the business readiness for the release, including ability to deliver the Minimal Viable Product, operational readiness, conformance to relevant regulations and standards, plans to manage benefits, and end user's readiness to transition to new services.
- Review the state-wide support model and processes, including how changes/ defects will be managed, how system availability, performance and security will be monitored and considerations for support teams which will be in place to support users.

At the end of fieldwork, a report will be prepared summarising any findings or opportunities for improvement. A behavioural root cause analysis will be applied to any findings reported to facilitate insights into the cultural reasons behind control failures/compliance deficit.

Project code: 2223-17

#### Exclusions

This health check will not assess the financial viability of the project or conduct a specific information security review.

#### Estimated timetable

Commence fieldwork	Finalise fieldwork	Draft report to management	Final report
19 June 2023	31 July 2023	04 August 2023	18 August 2023

#### Key stakeholders and review team

Review sponsor(s)	Ishra Baksh, Acting General Manager (Passenger Transport Strategy and Technology)
Management contact(s)	Neil McCaffrey, A/Director – Digital Delivery, Digital Licence Project
Internal Audit team members	Tim Van Gool, Acting Director (Internal Audit Services) Daniel Klaser, Acting Manager (ICT Audit Services)

#### Acknowledgment

Throughout this review Internal Audit will comply with the Public Service Commission Code of Conduct and adhere to the Institute of Internal Auditors' Core Principles for the Professional Practice of Internal Auditing, the Definition of Internal Auditing, the Code of Ethics, and the International Standards for the Professional Practice of Internal Auditing.

Internal Audit appreciates your support and the cooperation of your staff as we work together.

NR

Samara Dowling  
Acting Chief Auditor

#### Review sponsor approval

On behalf of the Department, we confirm that we understand and agree with the above Terms of Reference.

Sponsor name and title	Signature	Date
Name: Ishra Baksh Title: Acting General Manager (Passenger Transport Strategy and Technology)	NR	19/08/2023

DMS reference: 110/1578

## Appendix B: Key Stakeholders Interviewed

Full name	Role / Title	Branch
Michelle Haywood	Executive Director (Digital Licence Program)	Translink
Michael Skinner	Director (Customer and Business Transformation)	Translink
Kellie McGowan	Director (Change)	Translink
Neil McCaffrey	A/ Director (Digital Delivery)	Translink
Matthew Radford	Manager (Customer Experience and Product Design)	Translink
Kaylene Berndt	Manager (Customer)	Translink
Julie Sugden	Manager (PMO)	Translink
Antonio Murray	Project Advisor (Digital Licence)	Translink
Jason Latimer	Program Manager	Translink
Graeme Callister	Product Manager	Translink
Adam Atkins	ICT Procurement Specialist	Translink
Brett Stewart	Director (Application Management)	Information Technology Branch
Michael Hayles	Manager (Product Development)	Information Technology Branch

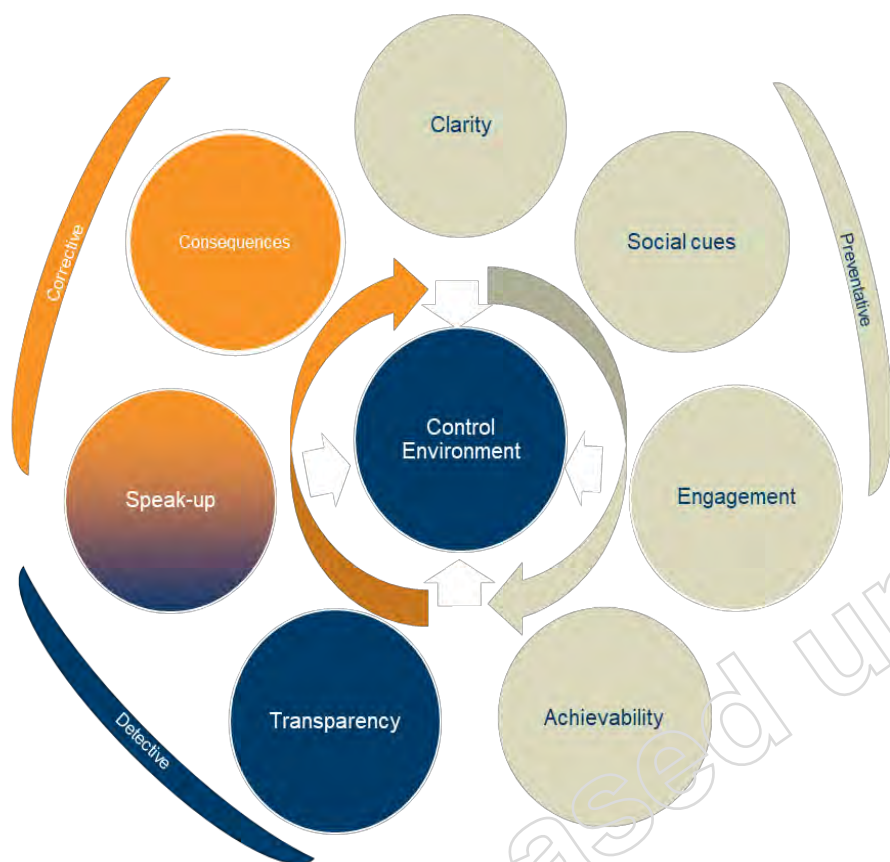
## Appendix C: Risk and Control Assessment

The table below documents Internal Audit's assessment of key risks and associated controls, as identified in this review. The information is provided to facilitate relevant risk / control owners' effective management of the risks / controls under their responsibility.

Risk description	Risk Owner	Control(s) used to manage the risk	Control effectiveness	Required action
Inaccurate or untimely reporting of JIRA risk report extracts leading to ineffective monitoring and communication of project risk issues, resulting in project delays and subsequent financial and/ or media & reputational damage to TMR	Manager (PMO)	Key learnings, incl. customer feedbacks and the Gate-4 recommendations, are incorporated into the process of delivering the "end product"	Effective	N/A
Inaccurate or untimely reporting of end-to-end test results leading to ineffective monitoring and communication of project progress, resulting in a delayed 'go/ no go' decision by senior management, and subsequent financial and/ or media & reputational damage to TMR	Product & technical Managers	Adequate testings on cybersecurity vulnerabilities to protect personal data and to build up preparedness for responding to data breaches	Effective	N/A
Failure to monitor vendor delivery progress leads to delays in deliverables resulting in missed deadlines, increased costs, potential dissatisfaction among stakeholders and subsequent financial and/ or media & reputational damage to TMR	1. Product Manager 2. Product Manager 3. Contracts Manager/ Project Director 4. Product Manager	Roles and responsibilities are clearly defined to ensure that internal and external teams are working towards the same outcomes	Effective	N/A
Failed cross-jurisdictional interoperability element and a lack of an independent review on the compliance level of the DLA to the ISO18013 standard resulting in deliverables that do not meet customer expectation which leads to subsequent financial and/ or media & reputational damage to TMR	Director (Customer and Business Transformation)	Managing customer expectations for a cross-jurisdictional interoperability and an ISO18013 certification with an aligned public messaging	Partially Effective	Please refer to "Observation 2" with recommendations
Failure in reviewing benefits register on a regular basis in the forthcoming implementation phases impairs project governance on benefit realisation, ownership and alignment to planned milestones which may lead to customer dissatisfaction and subsequent financial and/ or media & reputational damage to TMR	Manager - PMO	Key project documentation should be timely updated, particularly the business case and the benefit realization plan	Partially Effective	Please refer to "Observation 5" with recommendations
Business case is not valid due to internal and/ or external events or changes which results in deliverables that do not meet the required	Manager - PMO	Key project documentation should be timely updated, particularly the	Partially Effective	Please refer to "Observation

quality standard, timeframe, budget, customer expectation leading to a potential project failure and subsequent financial and/ or media & reputational damage to TMR.		business case and the benefit realization plan		5" with recommendations
Failure to closely monitor and provide a regular status update to senior management on the significant implementation risks in the Townsville rollout leading to a potential project failure and subsequent financial and/ or media & reputational damage to TMR.	Manager - PMO	Key learnings, incl. customer feedbacks and the Gate-4 recommendations, are incorporated into the process of delivering the "end product".	Effective	N/A
Unclear or poorly-defined roles, responsibilities, timeframes and deliverables for internal and/ or external teams on managing key projects areas leading to a potential project failure, data breaches and subsequent financial, legal and/ or media & reputational damage to TMR.	Project management	Roles and responsibilities are clearly defined to ensure that internal and external teams are working towards the same outcomes.	Partially Effective	Please refer to "Observation 3 & 4" with recommendations
Failure to manage the risk of a substantial cost increment due to the contract clause of indexing to Consumer Price Index (CPI) rates for future ("stage 3") services rendered by Thales, resulting in an adverse impact on budget including sufficiency of funds to complete the remaining phases (previously when the contract was executed CPI was around 2.2% and the latest figure in June 2023 was 5.4%).	1.Executive Director (Digital Licence Program) 2.ICT Procurement Specialist	Risk of inflation and service cost increase impacting project budget are managed by contract and/ or budget management measures	Effective	N/A
Risk of repeating mistakes from the past phases/ trials which may result in missed deadlines, increased costs, potential dissatisfaction among stakeholders and subsequent financial and/ or media & reputational damage to TMR.	Director (Change)	Key learnings, incl. customer feedbacks and the Gate-4 recommendations, are incorporated into the process of delivering the "end product"	Partially Effective	Please refer to "Observation 1" with recommendations
Inadequate capabilities and capacities to deliver the Minimal Viable Product. Inadequate testing of various scenarios resulting in undiscovered vulnerabilities, errors, or insufficient preparedness for unexpected events leading to a potential project failure, data breaches and subsequent financial, legal and/ or media & reputational damage to TMR.	Director (Customer and Business Transformation)	Roles and responsibilities are clearly defined to ensure that internal and external teams are working towards the same outcomes	Effective	N/A
Project outcomes misalign with prevailing Government strategies and policies leading to reputational damages to TMR.	Project management	Project outcomes are strategically aligned with prevailing Government policies	Effective	N/A

## The Behavioural Drivers Model



<b>Clarity of communicated roles and responsibilities</b>	Are there adequate and clear rules, procedures and responsibilities? Is there an excessive focus on rules (groupthink)?
<b>Social cues / tone at the top / role modelling</b>	Do managers and peers set a good example? Are social norms in line with the organisation's core values? Do management override controls?
<b>Engagement / alignment</b>	Do employees feel motivated and engaged to uphold standards? Is there a culture of ownership and accountability?
<b>Achievability and incentives</b>	Are activities and targets realistic? Are staff adequately skilled and capable to perform tasks required of them?
<b>Transparency</b>	Is staff behaviour visible to others? Are staff aware that their behaviour and deliverables are observable by others?
<b>Speak-up / open dialogue</b>	Do staff feel comfortable to voice their opinion, raise issues and discuss dilemmas? Are authority figures able to be challenged constructively? Are staff held accountable by others in the organisation for misconduct or undesirable behaviour in a one-on-one setting?
<b>Consequences</b>	Is desired behaviour rewarded and undesirable behaviour sanctioned? Is there a tolerance for small breaches? Are consequences fair and transparent? Is there a culture of fear and blame? The scale to which behaviour is sanctioned should lean towards lenient rather than excessive to drive a safe to fail cultural environment.

## Appendix D: Supplementary information for Observation 1

The review team has followed the prescribed process for obtaining Queensland Digital Licence which is summarised below:

1. The prerequisite for obtaining the Queensland Digital Licence app is creation of a Queensland Digital Identity (QDI) in accordance with the instructions on landing page<sup>10</sup> verification of two separate groups of credentials was required. First group contained a choice of Queensland-issued driver licence, a Queensland marine licence, or a Queensland photo identification card/ Adult proof of age card. The second group contained an Australian birth certificate, an Australian passport, or a foreign passport with valid visa or entry stamp<sup>11</sup>.
2. Verification of the first credential (Queensland-issued driver licence) was successful, however we could not conclude the onboarding process due to unavailability of any of the secondary identification documents.
3. The landing page instruction noted a phone number for Digital Licence app help (1800 317 389), which was contacted by Internal Audit.
4. The advice provided by the support officer (upon confirming it with the supervisor) that at this stage of the pilot no other options are available to finalise the onboarding process. No escalation path was mentioned for resolving this onboarding issue.
5. Upon raising the matter with Digital Licence Project management, an official email address was provided as an escalation point and the additional evidence was provided resulting in successful completion of the onboarding process.
6. It was noted from a subsequent conversation with Executive Director (Digital Licence Program), that the above was a training issue and the correct practice for the customer service support officer was to escalate by contacting the DLA (Digital Licence app) support team and to look at manual uplift options for onboarding whenever a listed second credential document cannot be provided. The review team was advised that a guideline for manual uplift options is still in-progress.







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<sup>10</sup> <https://www.qld.gov.au/transport/projects/digital-licence/business-verify>

<sup>11</sup> <https://www.qld.gov.au/transport/projects/digital-licence/queensland-digital-identity>

## Appendix E: Recommendations in the Gate-4 Assurance Review Report

### 2.5 Recommendations summary

#	Recommendations	Priority rating
R1.	Consider ways to improve data extracts from <i>JIRA</i> to enable easy review by broader stakeholder groups beyond the project.	 Recommended
R2.	Continue to monitor and communicate the end-to-end test results leading up to go-live, to ensure the appropriate timing of the 'go/ no go' decision.	 Recommended
R3.	Continue to monitor vendor progress of the outstanding deliverables from 'stage 2'.	 Recommended
R4.	If the go-live date is delayed, assess any impacts on project resources and available funding and support availability over the Easter holiday period.	 Essential
R5.	Continue to ensure that risks to the production phase ('stage 3') are identified, managed, and included in future project board agendas, particularly those relating to the development of a cross-jurisdictional interoperability roadmap with other states.	 Essential
R6.	Ensure that the benefits realisation plan is reviewed on a regular basis, throughout the upcoming implementation phases.	 Recommended