

Consultation on the National Identity Scheme Delivery Plan 2008

Introduction

The purpose of this consultation is to help the Government to proceed with the implementation of National Identity Scheme, including the introduction of identity cards linked to a National Identity Register.

There are a number of specific consultation points that we have highlighted in the Delivery Plan, published on 6 March 2008. Please download the entire publication from <http://www.ips.gov.uk/nis-delivery-plan-2008.pdf>

Comments need not be limited just to these points and we invite any wider comments on our proposals for the implementation of the National Identity Scheme, you may use the additional comments box of the questionnaire on page 9 for your other points.

We will take full account of all comments received on these proposals. The consultation period ends 30 June 2008. Once we have taken stock of the comments received following this consultation, a summary of the responses received will be published. This will be within three months of the closing date for this consultation and will be made available on the Identity and Passport Service website www.ips.gov.uk. The outcome of the consultation will help inform secondary legislation for the National Identity Scheme.

As specified above, all comments received may be published unless the person or organisation making them asks specifically that they should not be published.

The consultation points are set out on the pages below:

From Chapter 2 of the National Identity Scheme Delivery Plan 2008, your views are sought on:

2.1 (i) what kind of information about the Scheme the public may need

The NIS has been marketed for six years on the basis that it will help to fight crime and terrorism and it will help to deliver public services efficiently. Little detail has been provided to explain how it will achieve those admirable objectives.

How will the NIS help to fight crime and terrorism? IPS rely here on the alleged near-100% reliability of biometrics. But all large-scale trials of the biometrics chosen suggest that they are not reliable enough to do the job. More detail required.

And how will the NIS help to deliver public services more efficiently? DWP admit to there being nine million National Insurance Numbers extant that they can't account for. Why would the NIR be any different? Again, more detail required.

(ii) what kind of information about the Scheme may be needed by organisations that might want to take part in delivering the Scheme

This question is back to front. IPS are meant to have issued invitations to tender by now and are meant to start awarding contracts this spring, i.e. now. Without those ITTs, how can prospective suppliers know what is needed? It is up to IPS to tell them. It is not up to the prospective suppliers to guess what is needed.

This matter was presumably debated at length by the Crosby Forum on public-private identity management and IPS should therefore already know the answers.

More detail is needed on how IPS see the scheme being used. Even after six years, that remains opaque.

(iii) how and where information about the Scheme should be communicated to the public and other users

The government has several hundred years experience how to communicate with people. IPS has a marketing team and has access to any number of consultants, including marketing consultants. This question is surprising.

2.2 (i) what sort of advice and support should be provided to the public and other users of the Scheme

Please see 2.1 (i) above.

(ii) how to involve non-government organisations in the provision of advice and support about the Scheme to the public and other users

Please see 2.1 (iii) above.

2.3 (i) how to involve the public in independent scrutiny and oversight of the Scheme

The record here is poor. Any number of interested parties have submitted suggestions to IPS, see for example <http://dematerialisedid.com/BCSL/Campaign.html>, and IPS refuse to engage in debate. Which suggests an organisation that does not appreciate independent scrutiny and oversight.

IPS need to demonstrate a willingness to engage before methods of scrutiny and oversight are decided. At the moment the sense is that there is no point making any suggestions, they will simply be ignored.

(ii) how potential and established users of the Scheme might be involved to bring independent scrutiny and oversight

Please see 2.3 (i) above.

From Chapter 3 of the National Identity Scheme Delivery Plan 2008:

3.1 Views are sought on the introduction of a requirement to enrol in the Scheme as part of a pre-employment check for employees working in sensitive roles or locations, such as airports.

There are already pre-employment checks for people working in sensitive roles and locations. IPS need to demonstrate that introducing yet more will add anything to people's security. The case has not been made. It looks as though IPS are in search of a role. The role is already being performed. What could IPS add?

IPS promised in their strategic action plan for the NIS to deliver an "enhanced employee checking service" for employers by June 2007. Despite being a strategic action, it was not performed, the service was not delivered then and still hasn't been. And yet Liam Byrne wants to fine employers for employing people illegally. How can they be fined for failing to do something that even IPS can't do? (Please see <http://dematerialisedid.com/BCSL/NotWorking.html>).

3.2 Views are invited particularly from young people on:

(i) the best way of rolling out identity cards to them, including how and where to enrol in the Scheme

The National Physical Laboratory suggested in their 2003 report to the Home Office and DVLA that a national network of about 2,000 registration centres would be needed, the Netherlands plan for about 4,000 centres and Italy already have about 8,000. IPS have 69.

IPS are therefore not serious about operating a feasible registration service themselves and need other organisations to do it for them. The Crosby report makes it clear that the banks and the major retailers are not prepared to act as partners.

What other organisations are there with a national network of trusted branches? Local authorities? The police? The Post Office (currently being much reduced)? GP surgeries? The Church of England?

More questions than answers, but that is the situation IPS have allowed to develop.

(ii) what services the Scheme could provide to them that would make it particularly attractive for them to enrol for an identity card

Again, the question is back to front, please see 2.1 (ii). After six years thinking about it by IPS and its predecessors, the benefits, if any, should be known. It is not up to the public to guess what the NIS is for.

3.3 views are invited from organisations providing services to young people on the best way to deliver benefits from the Scheme to the people they work with

Please see 3.2 (ii).

3.4 Views are invited on how to deliver benefits from the Scheme to those who hold a separate identity card, passport or both when the Scheme is enrolling large volumes on the National Identity Register

Please see 3.2 (ii).

3.5 Views are sought on:

(i) the ways to create an effective market to deliver fingerprint enrolment capability for the Scheme

There are no obvious partners for IPS to appeal to, please see 3.2 (i) above. There is also no effective technology available. The 2004 UKPS biometrics enrolment trial revealed that the flat print fingerprinting technology proposed for the NIS has an error rate around 20%.

That is also the experience of US-VISIT, where the technology is used for real, not in a trial. Officers of the US Department of Homeland Security warned members of the House of Commons Science and Technology Committee that the technology is not robust enough to support a national identity scheme and the Committee passed that on to IPS, who have ignored the advice, <http://dematerialisedid.com/Open2.html>

There is currently no way to create an effective market to deliver fingerprint enrolment, IPS know it and to proceed anyway is to demonstrate that the organisation is unfortunately in denial and cannot recognise that the biometrics emperor has no clothes.

(ii) what needs to be done to make participation by the private sector in delivering this capability an attractive proposition

The Crosby report suggests that there is nothing to be done, participation cannot be made attractive, please see <http://dematerialisedid.com/BCSL/Risk.html>

Any private sector organisation working on the scheme will be tarred with the same brush identified by Crosby:

"The scheme's governance should be designed to inspire the highest level of trust among citizens. It should be operated independently of Government".

Additional comments you may have?

In the six years since the July 2002 consultation on entitlement cards, IPS and its predecessors have made no progress. Considering that the NIS is meant to be part of our plans for national security, that is surprising.

The matters arising in this latest consultation are so basic that the question arises what IPS have been doing all day for six years.

The NIS has at least two flaws:

1. Smart cards are the wrong technology. We already have ID cards, in the form of our mobile phones.
2. The biometrics chosen for the NIS are too unreliable to do the job.

These points have been brought to IPS's attention several times, and ignored. Perhaps this time you will look at <http://dematerialisedid.com/> where some answers are worked out for you, and have been ever since the ideas were first sent to you on 31 January 2003.