



Home Office

BUILDING A SAFE, JUST
AND TOLERANT SOCIETY

Identity Cards

A Summary of Findings from the Consultation Exercise
on Entitlement Cards and Identity Fraud



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*Presented to Parliament
by the Secretary of State for the Home Department
by Command of Her Majesty
November 2003*

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Foreword

**by the Home Secretary,
the Rt Hon David Blunkett MP**



I am immensely grateful to the many members of the public and organisations who have contributed to this consultation exercise. I wanted to allow a much longer period than usual for people to consider the arguments and express their views. This paper summarises the responses and the results of surveys and polling which demonstrated substantial commitment to some form of identity card, a term the public preferred to the term 'entitlement card'.

In principle, the Government believes that a national identity cards scheme could bring major benefits. In practice, given the size and complexity of the scheme, a number of issues will need to be resolved over the years ahead. So we intend to proceed, by incremental steps, to build a base for a compulsory national identity cards scheme. We will legislate to enable the scheme to be introduced, and plan on the basis that all the practical problems can be overcome. Subject to certain conditions being met a final decision to proceed to a compulsory card will come later this decade and require a vote in both houses of Parliament.

A handwritten signature of David Blunkett in purple ink. The signature is written in a cursive, flowing style and reads "David Blunkett".

DAVID BLUNKETT

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Part A

Conduct of the consultation exercise

The following chapter explains how the consultation exercise on entitlement cards and identity fraud has been conducted in accordance with the seven criteria set out in the Cabinet Office Code of Practice on written consultations.

Criterion 1 – Timing of consultation should be built into the planning process for a policy (including legislation) or service from the start, so that it has the best prospect of improving the proposals concerned, and so that sufficient time is left for it at each stage.

Early consultation

In February 2002, the Home Secretary announced that he would be publishing a consultation paper on entitlement cards later that year. Work immediately began on identifying and making initial contact with the main non-Government stakeholders in the months prior to the publication of the consultation document.

Time set aside

The consultation exercise was launched on 3rd July 2002, with the publication of the consultation paper on Entitlement Cards and Identity Fraud. The consultation period lasted until 31st January 2003. Discussions with some stakeholder groups continued after the end of the consultation period.

Forms of consultation:

STAKEHOLDERS

A wide range of stakeholders were contacted both before and after the consultation period began. The objectives for contacting these groups were to confirm/identify the concerns of each group and to decide what needed to be done to address them, if at all possible. This ensured that any areas of the consultation paper that were unclear could be explained and gone through and next steps could be adapted/modified according to the emerging views. This approach also ensured that there have been few surprises in the content of the written feedback received from these groups.

PRESENTATIONS BY OFFICIALS

Both before and during the consultation exercise, officials gave several presentations at events arranged by organisations. These varied from 'closed' events such as those set up by the Association of Chief Police Officers (ACPO), Intellect (the IT Industry's Trade Association), the Local Government Association, and Local Government fraud investigation officers, to more public ones such as two presentations given to the Confederation of Indian Organisations and British Telecom. The events varied in size, from large audiences of several hundred, down to smaller ones of approximately 30.

Numerous meetings were also attended by officials to explain the details of the consultation and card scheme, where organisations had taken up our offer.

FOCUS GROUPS

Qualitative research based around focus groups was commissioned by the Home Office and conducted by professional researchers. This was a very useful source of information during the consultation period. The work covered 15 separate groups, set up for the purpose of testing public awareness of the consultation and its content and as a means of identifying people's views on some of the specific issues.

QUANTITATIVE SURVEYS

Polling on entitlement cards in Great Britain and Northern Ireland was commissioned towards the end of the consultation period, with a re-run in February 2003, which included more specific questions for Northern Ireland and for minority ethnic groups.

These additional questions were informed by the results of the qualitative focus group work. Questions asked included what people would be prepared to pay for a card from a range of nothing to more than £20. Minority ethnic groups were asked about particular concerns, including being singled out on the grounds of identity, and people from Northern Ireland were asked about electoral fraud.

The results from the polling proved very useful in indicating strength of support for a scheme and how this ranged across minority ethnic groups.

OTHER QUALITATIVE WORK

During the consultation, other focus group work, polling and opinion surveys were carried out independently by various bodies and organisations. This included focus group work by the British Council with international students, following a meeting between the British Council and Home Office Officials; and focus group work by Connexions Card (educational reward card scheme for 16-19 year olds), again following input from Home Office officials.

MEDIA COVERAGE

Local media polls were conducted and media packs were sent out to all media organisations, UK-wide.

DEMONSTRATION SUITE

The United Kingdom Passport Service (UKPS) set up biometrics demonstrators for a period of a few weeks each at London, Glasgow, Belfast, Durham, Liverpool, Newport and Peterborough passport offices. These were set up as a 'walk in' suite for interested members of the public to try out. Those participating were asked to fill in an evaluation questionnaire with their views. Knightsbridge post office also agreed to have a demonstrator installed.

The type of biometric used for the purpose of the demonstrations was the iris. The London passport office also had a fingerprint biometric demonstrator. These demonstrations were held over a 6 month period and a total of 1869 people participated.

MINISTERIAL EVENTS

Home Office Ministers made visits to each of the regional Passport Offices holding the biometrics demonstrator in order to participate, as well as making speeches at Privacy

International and Intellect conferences. The Home Secretary gave a speech at the Information Commissioner's conference. Ministers also conducted 10 phone-in programmes across the UK during the consultation period.

Criterion 2 – It should be clear who is being consulted, about what questions, in what timescale and for what purpose.

We consulted on a universal scheme, which would impact on and involve everyone in the UK. Targeted and voluntary schemes were also consulted on.

Impact of proposals on particular groups

The paper contained 35 consultation points, many of which were directed at specific sectors, but which were equally open to response from all sources. For example P10 asked for views from organisations providing services in the public and private sector; P12 & 34 sought views from employers, trade unions and other interested parties; P25 particularly sought views from young people; P28 & 29 included a request for views from potential partners on biometrics, setting up networks and smartcards; P31 asked for business and technical views; P33 encouraged suggestions from people who would find it difficult to participate in a scheme.

We were keen to consult with groups who may be particularly affected in order to properly assess the potential impact of a card scheme. To this end, we included consultation with race and refugee organisations; rural organisations; young people; older people; groups representing people with disabilities; travellers and homeless organisations and women's groups.

Regulatory assessment

Because we had not definitely linked cards with particular services or uses at the outset, it was premature to do a full regulatory impact assessment for the purpose of the consultation.

Relevant Parts of UK

It was made clear in the consultation document that we were consulting on a UK-wide scheme, and contact has been maintained with each of the devolved administrations throughout the period. The Ministerial visits conducted during the consultation exercise were across the UK.

Decisions taken

A compulsory to carry scheme was ruled out at the outset, with the Government making it clear that it did not wish to consult on a scheme where everyone would be required to carry a card at all times.

Deadlines

A deadline for responses was initially set at 10 January 2003. This was later extended to 31 January, with this being announced in Parliament and made clear in all correspondence with the general public and other groups.

Criterion 3 – A consultation document should be as simple and concise as possible. It should include a summary, in two pages at most, of the main questions it seeks views on. It should make it as easy as possible for readers to respond, make contact or complain.

The consultation paper included an executive summary, covering the potential uses of a card, how a scheme might work in practice and cost estimates. Annex 1 of the consultation paper listed all of the 35 consultation points.

Main information and competing arguments

Throughout the consultation paper, in discussing each of the main options, the pros and cons were clearly set out. For example, the advantages and disadvantages of a voluntary scheme are provided in detail.

Chapter 5 of the consultation paper set out how a scheme might work in practice, in order to allow people to make a more informed decision about whether or not they would favour it.

The other chapters of the paper provided details of other possible schemes, and what the likely disadvantages of each scheme would be. Information about card schemes in other countries was provided, including those countries where there is no scheme in place and those where the scheme is a compulsory to carry one. It also discussed other ways of reducing identity fraud e.g. establishing a fraudsters database and making more use of private sector anti-fraud services like credit reference agencies.

Key questions

Summary leaflets were prepared, tailored for particular organisations such as the police and local government authorities and race groups, with key questions being asked, addressing their particular concerns. These were not necessarily actual consultation points, but were on areas most relevant to the specific groups.

Contact details

The consultation paper and summary leaflets were made available on the website. Details of the website, e-mail, telephone, fax and postal addresses were provided in the consultation document, the summary leaflets and all correspondence.

Targeted consultation

Maximum use was made of umbrella organisations at the earliest stages of the consultation to ensure best coverage and reduce burdens of providing responses. Examples are Intellect – the IT industries' trade association; the TUC and the CBI; the CRE representing race organisations, and the Confederation of Indian Organisations. Individual responses were also strongly encouraged.

Criterion 4 – Documents should be made widely available, with the fullest use of electronic means (though not to the exclusion of others), and effectively drawn to the attention of all interested groups and individuals.

The beginning of the consultation period was marked by a press release and an oral statement by the Home Secretary in the House of Commons. There was extensive press coverage on the announcement, with it being covered in all the national newspapers. Many broadsheet newspapers published detailed coverage and comment pieces, with the Home Secretary providing an article for the Times. It was also the lead item on BBC TV news.

Over 5,000 copies of the consultation paper were sent out.

Members of the general public who wrote in were sent replies tailored to the views they expressed and each individual was sent a copy of the consultation document, together with the website address to obtain further copies. Responses were recorded on a database for reference and analysis. All the people who wrote or emailed between February 2002 when the consultation was announced and July 2002 when the paper was published were also sent a copy of the paper. No charge was made for the consultation paper at any stage.

Copies of the consultation paper were sent to all the acquisition libraries in the UK.

As set out above, a web-site was established at the beginning of the consultation period, where both the consultation paper and the identity fraud report could be downloaded. A summary leaflet of the full paper was also made available on the website and was sent out via post and e-mail.

Media coverage included 10 phone-in programmes with Home Office Ministers and local media polls. Media packs were sent out to all media organisations, UK-wide.

Format

Copies of the consultation summary have been made available on request in a taped version and in large print.

Face-to-Face Visits

Home Office officials held face-to-face meetings and gave presentations at various events for a wide variety of different stakeholders, with both officials and Ministers having accepted every invitation received to speak at events. This level of input was provided to all groups which took up our offers.

Criterion 5 – Sufficient time should be allowed for considered responses from all groups with an interest. Twelve weeks should be the standard minimum period for a consultation.

The consultation period was well in excess of the 12 week minimum period as set out in the Cabinet Office guidelines. It ran from 3 July 2002 until 31 January 2003, providing nearly 7 months for responses to be received.

REQUESTS FOR EXTENSIONS

Requests for extensions were considered on the merits of each case, with the reasons and timing being taken into account.

Although the consultation period ended on 31 January, we were keen to see the debate continue and all correspondence continued to be noted and recorded.

Criterion 6 – Responses should be carefully and open-mindedly analysed, and the results made widely available, with an account of the views expressed, and reasons for decisions finally taken.

A very careful analysis of responses has been made, as can be seen in the following summary of findings.

Findings have not been based on a simple adding up of numbers for/against. Levels of support amongst particular groups have been looked at very carefully.

The views of representative bodies have been assessed, as well as individual organisations and people who wrote in on an individual basis.

New approaches, such as changing the name of the card, and common points for/against particular aspects of a scheme have been highlighted and taken into account in the decision making process.

Availability of individual responses

All responses from stakeholder groups, other groups and organisations, and members of the public have been recorded on a database, and all views that have presented new or added value information have been considered, discussed and included in this summary.

All requests for sight of responses will be considered in accordance with Open Government and Freedom of Information provisions.

The summaries of responses for each stakeholder group name the organisations and attribute specific quotations to them, unless privacy has been requested.

However, it cannot be presumed that all general public respondents were aware of the presumption set out in the consultation paper that the names of respondents could be published.

In this light it has been decided not to publish the names of individuals other than those of the stakeholder organisations who have not specifically requested confidentiality, and to keep anonymous the quotations extracted from individual responses.

Criterion 7 – Departments should monitor and evaluate consultations, designating a consultation co-ordinator who will ensure the lessons are disseminated.

A small, dedicated team was set up specifically to handle the consultation process. An evaluation of how the consultation was conducted will be undertaken.

Members of the entitlement card consultation team will also be representing the Home Office in an inter-departmental discussion group, looking at public consultations and the revision of the Code of Practice.

Part B

Summary of findings from the consultation exercise

Correspondence received from the general public and stakeholder organisations is not representative of the general public's views but does provide a good indication of the level of public interest.

In preparing this paper, as many views as possible have been taken into account, including those received shortly after 31 January where this has been practicably possible.

Although the consultation period has ended, we have still been recording and taking into account all views received, as these are important in formulating next steps, as is our continuing work with stakeholders.

Views Received by Beginning of March 2003

View	Number	% of those who expressed an opinion
In favour of a card scheme	2606	61
Against a card scheme	1587	38
Neutral	48	1
Follow-on comments	309	
Information about products	76	
Proof of age	6	
Request for information	310	
TOTAL RESPONSES	4942	

CHAPTER 1: VIEWS OF THE GENERAL PUBLIC

Most members of the public who have written in during the course of the consultation have done so to express their general opinion on the issues surrounding entitlement/ identity cards, the principle of the scheme and about various aspects of it. Many have been prompted to do so through media reports rather than having read the consultation document itself. Of those who did address the consultation questions, only a few referred to each one, with most preferring to address particular questions. Others provided in depth views on how aspects of the scheme could/ could not work and suggested alternatives.

Comments and reasons for and against an entitlement card scheme have been found to be very much in line with those provided by various stakeholder groups, and themes are common with those raised by the focus groups. A summary of these views for and against, as supplied by the general public, are provided in the following sections.

General Public – Views For

MAIN THEMES:

- Enhance sense of community – visible means to feel pride in citizenship
- Psychological security – knowledge that we are properly accounted for by our authorities
- Provides user with easy way to confirm identity
- Proof of eligibility to benefits
- Easy access to a range of services
- Only object if something to hide
- Will not infringe civil liberties
- Help fight identity fraud
- Costs
- Proof of age
- Shouldn't be a problem as we already have passports and driving licences
- Help prevent illegal working and immigration
- Internal travel identity requirements by airlines
- Easy travel in Europe
- Reference to having cards in the Second World War with no problems
- Long overdue

ENHANCE SENSE OF COMMUNITY/PSYCHOLOGICAL SECURITY

This was a common theme amongst those who favoured the principle of a card scheme.

Incorporated in many of these views was the view that the card must be universal in order to be worthwhile.

“The card scheme needs to be universal, with no “special category”. We all share the burdens, responsibilities and pleasures of Citizenship. Targeted areas are untidy and ultimately expensive.”

Name supplied, Sussex

EASY WAY TO CONFIRM IDENTITY/PROOF OF ELIGIBILITY TO BENEFITS

Many comments were made that having only one card to carry as proof of identity would be much more convenient. There were also several references to the inconvenience of frequently being asked for proofs of identity, and having to carry such a range of documents. Easier access to benefits was frequently mentioned as a good reason for having an identity card.

*“Now isn’t it just common sense and LOGICAL to sweep away all these and having to carry some of these and having to carry **the ID card**. Wouldn’t it cut down on problems of identification.”*

Name supplied, Lanarkshire

A card was seen as a useful form of identity for those who don’t drive and don’t want to carry a passport book everywhere.

EASY ACCESS TO A RANGE OF SERVICES

This was a popular reason for wanting a card. It was felt that it would be genuinely useful and cut down waiting times for accessing services. It was felt that an ID card would be of great use to retailers and in pubs and clubs, which frequently demand to see official ID cards prior to admittance or service.

NO INFRINGEMENT OF CIVIL LIBERTIES/ONLY OBJECT IF SOMETHING TO HIDE

Many comments refuted the claims that a card scheme would infringe civil liberties. Several comments were made discounting this notion. A frequent comment was that the only people who could possibly object to a card scheme were those who had something to hide.

*“Ignore the shrill cries of “what about human rights and personal freedom etc”.
Most of the planet does not have these luxuries!”*

Name supplied, Surrey

“I totally refute the notion that it is an evasion of privacy, since we already have a birth certificate and N I number. I agree the card should contain biometric information against fraud otherwise there is no point in having a card.”

Name supplied, W Sussex

“Police will not want to waste their time stopping everyone in the street just to inspect their ID cards. They have more important duties to carry out. It is only people who behave suspiciously who should – and quite rightly deserve to – fear. That is the purpose of having ID cards!”

Name supplied (email)

“Like my friends and acquaintances, I cannot understand how a law abiding citizen can object to the proposal or how they will limit or infringe my “civil liberties”.”

Name supplied, Flintshire

HELP FIGHT IDENTITY FRAUD

Many people considered that a card scheme would be an effective tool to help prevent identity fraud.

“... I support the idea of ID cards if this would help reduce the number of victims of fraud, and its cost, and help catch those guilty. Most of us already carry a number of different cards and often need some means of proving our identity.”

Name supplied, Cambs

COSTS

On the costs of a card, several people commented that they would be willing to pay for their card as it would be genuinely useful to them and would be worth the money.

“... if people pay for one they would certainly use it, it would give the card authority.”

Name supplied, Co Durham

Others commented that although they wouldn't mind being charged for a card, they felt that exceptions should be made for those in receipt of benefits and elderly people.

PROOF OF AGE

Having a card as a ready means of proving age for age-restricted goods was very popular. It would help to restrict access to these goods. The sale of fireworks to underage children was frequently mentioned.

WE ALREADY HAVE PASSPORTS AND DRIVING LICENCES

As a follow-on from views that a card scheme would not pose any threat to civil liberties, many comments were received on the fact that we already have identity cards in the form of our passports and driving licences. Therefore, it was considered that the concept of identity cards was not something entirely new for people to get used to – it would simply be an official recognition that these documents prove identity.

There was also the view that a lot of information is already held about people on databases anyway, so the introduction of a card scheme would not alter this aspect, and therefore should not cause concern.

HELP PREVENT ILLEGAL WORKING AND IMMIGRATION

It was considered that the introduction of a card scheme on a universal basis would put us on the same footing as other European countries and make the UK a less desirable destination for illegal immigrants. It would also make it harder for those already here to access services illegally.

“I consider that all foreign nationals should be obliged to hold such cards if working in the UK. In view of the limited work involved in applying for such a card this should not deter in any way those wishing to work here legally.”

Name supplied, Shropshire

INTERNAL TRAVEL IDENTITY/EASY TRAVEL IN EUROPE

There were comments from people who have been asked to provide identity documents for internal flights, which has proved very inconvenient, especially to those without a current valid passport or who did not wish to the passport book around. Just having a passport card as eligibility to travel instead of having to carry the book was popular.

“I still have a French Carte de Sejour from when I worked there last year, and have found it invaluable as a photo-ID and travel document.”

Name supplied, London

CARDS IN THE SECOND WORLD WAR

The fact that there was a card scheme in the war, which was viewed as being successful and useful was highlighted by several people as being a good reason for having one now.

LONG OVERDUE

The introduction of an identity card scheme in the UK being long overdue was a comment which appeared frequently in correspondence from those in favour of a scheme.

OTHER ISSUES

Some comments were received from people confirming they would only support a scheme if it was compulsory, as this would be the only scheme that would be worthwhile. However, others commented that a voluntary scheme was better than nothing.

There was a degree of understanding in the responses that the Government may not be in a position to decide and announce the full details of how the scheme would work right at the beginning and there would be a degree of development as the scheme went along, without this implying anything underhand.

"I agree that Parliament will have to be asked to approve a card scheme without a complete description at the time as to the full range of its potential uses. It might be possible to arrive at a list of subjects that could be covered by secondary legislation, but even then it would be difficult to foresee all likely eventualities."

Name supplied, Gloucestershire

Facilitating new ways of voting was also mentioned as a potential advantage of a card scheme.

There was some concern amongst those in favour that the scheme would take too long to implement and would become a "project destined to be shelved". It was generally felt that the issues a card scheme would address need to be tackled sooner rather than later.

General Public – Views Against

MAIN THEMES:

- Privacy issues and civil liberties
- Costs
- Problems in setting system up and associated costs
- Government's inability to run a scheme
- Not effective in combating identity fraud
- Ineffective on illegal working and immigration
- Data protection
- Function creep
- Compulsory aspect
- Fears over loss/theft of the card
- Ineffective on preventing crime
- Aggravate racism
- Would not help with benefit fraud
- Biometrics – privacy issues

CIVIL LIBERTIES AND PRIVACY ISSUES

These were constant themes running through the correspondence.

“While the cards appear, superficially, to be of value, they are, to my mind, a further inroad on the part of the Government and its civil service in civil liberties of those entitled to expect, in a democracy, an increase in them”.

Name supplied, London (e-mail)

Many people voiced the opinion that they shouldn't have to constantly prove that they possessed the right of British citizens to obtain services which should be provided to all citizens anyway.

“...I, as a citizen of the UK most certainly should not have constantly to prove that I possess that right in order to obtain services that, as a taxpayer, voter and citizen, I have agreed should be provided to all citizens as part of living in a civilised society...In contrast, the need to defend the privacy and civil liberties of individuals is, I believe, of major importance”.

Name supplied, Hampshire

Human rights issues were raised and many people commented that people have the right to live an anonymous life. The dangers of the UK being on the way to becoming a Police State was also mentioned.

COSTS/PROBLEMS IN SETTING SYSTEM UP AND ASSOCIATED COSTS

Many comments were received on the unacceptability of a card scheme on the grounds of cost, both in terms of what individuals would have to pay for a card and to the taxpayer in setting up and running a system.

“The cost quoted is huge and there seems to be no guarantee that actual costs might not spiral beyond predicted cost. Is this scheme the best use of an enormous amount of money? Has any effort been made to look at other ways of combating illegal immigration etc. which could be brought in if a similar budget was made available?”

Name supplied, (email)

“... the continuing running costs of trying to up date the “smart card” information recorded for – say 45 mil people; not to speak of the technical problems of doing so.”

Name supplied, Dumfries & Galloway

GOVERNMENT’S ABILITY TO RUN A SCHEME

Many comments were received on the lines of the Government’s “long and terrible history” of handling large-scale computer projects.

There were concerns that inaccurate information would be recorded, with examples of people who have been incorrectly blacklisted for credit.

There were also concerns about what would happen as a result of wrong information being recorded, and the delays, stress and inconvenience this would cause, as well as the moral issues.

“It would be politically unacceptable for someone to become “unentitled” to something just because the authorities cannot keep identity data up to date.”

Name supplied, Wirral

NOT EFFECTIVE IN COMBATING IDENTITY FRAUD

Many people failed to be convinced that a card scheme would help fight identity fraud. Many felt that there was no guarantee that the document would not itself be forged, especially as they thought current documents are not forge-proof, for example National Insurance numbers.

Also, some people were not convinced about the accuracy of Government information about the levels of fraud, considering that the scale was not as large as it made out.

Views were expressed that current passports and driving licences were actually perfectly adequate documents which needed no change.

The existing systems were already adequate as the number of these documents that were forged was small. It was suggested that the Government should use other means of fraud investigation, instead of introducing a scheme on this scale.

There were also views that a card scheme could in fact increase the risk of identity fraud, not reduce it. New methods of forgery, such as cloned cards could be developed to meet the demand. It was commented that “high tech” criminals would use the scheme to hijack identities.

It was also considered by some people that we should not be concerned with systems in other European countries, as it was thought that these are ineffective in any case, and do nothing to prevent crime or illegal working.

“There is no evidence that EU countries operating an ID card scheme suffer less than the UK from fraud and crime.”

Name supplied, Bucks

The question “Do we really need a card?” was often raised.

INEFFECTIVE ON ILLEGAL WORKING AND IMMIGRATION

A common view was that a card scheme would not prevent illegal immigration.

DATA PROTECTION

There were many comments that once collected, data would be misused.

“Current police cultures and practice towards the leaking – and even sale – of highly sensitive personal data leaves a huge amount to be desired.”

Name supplied, Ipswich

Information in the wrong hands was a common fear, especially for vulnerable people such as those in care homes.

There were also concerns that the Government and commercial companies would not adequately protect people against abuses and misuse of data.

FUNCTION CREEP

There was suspicion that whatever scheme with whatever supposed safeguards was introduced, this or future Governments would alter it to suit other purposes later on.

“Identity cards were rightly abolished after the war because it was seen that they damaged relations between the police and the public. I would not trust any assurances that it would not be compulsory to carry cards – once they are introduced before very long the government would be tempted to make them compulsory.”

Name supplied, Tunbridge Wells

COMPULSORY ASPECT

“Let’s start by being truthful – the entitlement card is a Nat ID card in all but name – if you won’t be allowed to do or have access to our rights as a citizen of this country then the card effectively becomes compulsory.”

Name supplied (email)

FEARS OVER LOSS/THEFT OF THE CARD

Many comments were received expressing anxiety over what would happen if the card was lost or stolen. These comments were not exclusively from those opposed to a scheme, but this was a real concern, especially amongst the elderly (some focus group work has also highlighted this as a particular fear for young people as well). A card scheme would increase the existing fears the elderly have already about the dangers of losing documents, for example bus passes.

The dangers of theft were also expressed, especially concern regarding address and date of birth (for the elderly) being shown on cards. This would leave them vulnerable to being targeted by burglars.

AGGRAVATE RACISM

Some views were that a card scheme would be used in the wrong way by some organisations and members of society to single out minority ethnic groups. Abuse by police of ethnic minorities was particularly mentioned, with a card being used as a tool for harassment.

“... it will undoubtedly be used as a tool for harassment... Firstly to harass minority groups and secondly to achieve targets for police.”

Name supplied, Devon

INEFFECTIVE ON PREVENTING CRIME

Views were expressed about other aspects of crime that affect people's lives and are important to prevent. It was pointed out that a card scheme fails to address any of these important issues. Many said a card would do nothing to stop crime in general, for example robbery, muggings, bogus callers, car break-ins, vandalism.

WOULD NOT HELP WITH BENEFIT FRAUD

There were views that a card scheme would not help with benefit fraud. One view was that it would be better to see some levels of benefit fraud than to hand over this level of control to the state.

BIOMETRICS

Concerns about biometrics mostly centred around civil rights and privacy issues. Comments were also made about the security of providing that level of information. Views were that this type of information belonged to the individual, not to the state.

The criminal connotation in providing fingerprints when you have violated the law was highlighted and it was objectionable to many people to have to provide a similar level of information just to prove who you are. There were views that it would soon be possible for biometric information to be forged as well.

OTHER ISSUES

The title of “Entitlement card” was widely unpopular with frequent references to “spin” and “political spin”. It was commented that the title was “designed to airbrush out the big brother association with title ID card”.

There were some strong views on what should appear on the card itself, with strongest views against addresses appearing. This was common amongst those who favoured a card scheme as well, with concerns about the costs and administrative burdens in updating changes.

There were some issues surrounding sovereignty and membership of the EU and how this appears on the face of the card.

Some complaints were raised about the conduct of “silent consultation” with some people saying they had only just managed to get responses in at the end of the period due to poor communication about what was happening.

There was some concern that identity will be needed before emergency medical treatment can be given.

Concern was raised about what would happen to groups who would find it difficult to participate in a scheme, especially centring around elderly people living alone, with examples given of those with dementia and no relatives to rely on.

There were comments that although a card scheme might be better for the Government to perform functions, it would not be better for recipients.

General Views

There were many queries and ideas on how a scheme would work in practice, both from those who were opposed to the principle of a card scheme and those who were in favour of one.

A view frequently voiced was that the Government must be honest about name of card. The title was not only unpopular with those opposed to a scheme – as mentioned above.

“Don’t try and be clever by calling them entitlement cards. Be upfront, open and honest. Call a spade a spade.”

Name supplied, Lancaster

*“I do NOT want an “entitlement card” – I do NOT want an “all singing, all dancing” card – I **do** want a Passport card to prove identity..”*

Name supplied, Yorkshire

Multi-function documents, with many and varied purposes, especially linked to banking information, were unpopular in a large number of responses.

Of those in favour of a scheme, a voluntary one was considered better than nothing.

It was anticipated by some people that by the time a scheme was in place universally, iris biometrics might be more acceptable than fingerprints.

It was suggested that once-only visits to disabled people and other difficult to participate groups might be arranged, as happens with district nurses and doctors.

The need for personal consent before passing any information on to other agencies was frequently emphasised.

The importance of getting the issuing process right was seen as vital to very many people.

Using the National Insurance Number as the unique card number was frequently suggested, as well as ideas about incorporating it in the new system.

CHAPTER 2: QUANTITATIVE RESEARCH

This chapter covers the quantitative research undertaken as part of the consultation process. Chapter 3 covers the qualitative research. We considered it important to conduct both types of surveys in order to get a more rounded picture of views.

Quantitative research around polling questions has provided us with some breadth of information on peoples views. The qualitative research from focus groups provided more in-depth information about specific issues, the emerging findings of which could in turn form the basis of further quantitative surveys.

Polling on entitlement cards in Great Britain and Northern Ireland was commissioned for December 2002, with a re-run in February 2003, which included more specific questions for Northern Ireland and for minority ethnic groups. These additional questions were informed by the results of the qualitative focus group work.

The questions asked and the management summary for the GB omnibus research conducted are set out below, followed by the results of the minority ethnic polling.

General Polling

INTRODUCTION

Questions were placed on the Research Services of Great Britain (RSGB's) general public omnibus survey to establish attitudes towards identity cards.

2921 interviews were carried out in the UK amongst a representative sample of adults aged 16 plus in February 2003. Just over a thousand (1024) of the interviews were carried out among people living in Northern Ireland; in the analysis these were 'weighted back' to reflect their true incidence within the UK population.

An earlier identical survey was carried out in December 2002 but this did not include Northern Ireland. The results are compared with this earlier survey amongst those respondents from Great Britain.

QUESTIONS ASKED

Q.1 To what extent are you in favour or against the introduction of identity cards in the UK?

01: Very much in favour

02: In favour

03: Against

04: Very much against

(DK)

Q.2 Why are you in favour of identity cards?

Q.3 Why are you not in favour of identity cards?

Q.4 Which of the following, if any, would make you more favourable towards the introduction of identity cards?

01: If it made it more difficult for illegal immigrants to get work in the UK

02: If it helped to reduce fraud

03: If it put people off trying to enter the country illegally

04: If it made it easier for citizens to access public and financial services

05: If it helped protect your identity from fraud

(N) (DK)

Q.5 Approximately how much would you be prepared to pay for such a card if, like a £33 passport, it lasted for ten years?

01: Nothing

02: Less than £10

03: £10 – £20

04: More than £20

(DK)

KEY FINDINGS FROM POLLING

- More than three-quarters were in favour of the introduction of identity cards. Little demographic variation and therefore large majority in favour across all age groups, social grades and regions.
- Main reasons for being in favour – combating and preventing crime, and just proof of identity.

- Main reasons against – the threat to civil liberties and privacy, and doubts about their need or usefulness.
- There was some resistance to having to pay – half of all people, including more than four out of ten in favour of ID cards, claimed they are not willing to pay anything for them.
- The prevention of fraud is the reason that has the greatest potential to convince people of the need for ID cards.
- Results were very similar to those obtained in the December survey among respondents from Great Britain.
- For the most part, those from Northern Ireland differed little in their views from the rest of the United Kingdom. The proportions for and against ID cards were much the same as the rest of the UK. The main differences were that those from NI were more likely than those from elsewhere to be in favour of cards to confirm a person's identity and to prevent electoral fraud, and were less likely than those outside NI to be in favour of ID cards to prevent illegal immigration and illegal immigrants getting work.
- Within Northern Ireland there were few differences of note between Protestants and Catholics; although more Protestants (82%) than Catholics (72%) were in favour of their introduction, there were more Catholics (16%) than Protestants (10%) who were unsure whether they were in favour or against and hence the difference in the proportions against (8% of Protestants and 12% of Catholics) were not that dissimilar. There was some evidence to suggest that opposition towards ID cards is slightly harder among Catholics than Protestants and that the former are less susceptible to having their minds changed by arguments to support their introduction.

WHETHER IN FAVOUR OF THE INTRODUCTION OF IDENTITY CARDS

Respondents were asked to say to what extent they were in favour or against the introduction of identity cards in the UK.

Over three-quarters (79%) were in favour (34% very much in favour and 45% in favour), 13% were against (9% against and 4% very much against) and 8% did not know. The results were more or less identical to those obtained in the December survey. In Northern Ireland the proportion in favour (76%) was much the same as in GB (79%) but they were less emphatic in their endorsement (23% very much in favour and 53% in favour compared with 35% very much in favour and 44% in favour in GB).

More (85%) older people (aged 65 and over) were in favour than those younger than 65 (78% in favour).

As was found last time, more respondents from London (22%) than elsewhere (12%) were against their introduction.

Similar to last time, slightly more men (15%) than women (11%) were against identity cards.

In Northern Ireland 11% were against the introduction of the cards. More Protestants (82%) than Catholics (72%) were in favour. Opposition to the idea was only slightly greater among Catholics, with 12% against compared to 8% of Protestants; the rest of the difference in the levels of support was made up by more Catholics (16%) than Protestants (10%) who were not sure whether they agreed with the idea or not. In Belfast there was a higher proportion (13%) against the introduction of ID cards than elsewhere (7%).

REASONS FOR BEING IN FAVOUR OF IDENTITY CARDS

Respondents in favour of the introduction of identity cards were asked to say why they were in favour.

Many (approximately four out of ten) of the reasons for being in favour were to do with helping to stop or prevent illegal activities i.e. crime and illegal immigration. The other main group of reasons, also given by about four out of ten, were simply in terms of providing a means of identification and proof of identity.

Responses were similar to last time. The biggest change from the December survey in GB was an increase, from 11% to 16% (although this figure went down to 15% when responses from Northern Ireland were included), saying that they were in favour to stop illegal immigrants.

There were some differences in responses from Northern Ireland compared with those from the rest of the UK. More mentioned: being able to identify someone and be sure that (s)he is genuine (12%, compared with 7% in GB); that it would be an easy or useful means of identification (17% in NI, 7% in GB); that it would help stop fraud (21% in NI, 12% in GB). Fewer gave their reason for being in favour as stopping illegal immigrants (6% in NI, 16% in GB). The other difference was that 7% in Northern Ireland (9% of Protestants and 5% of Catholics) but no one elsewhere supported ID cards as a way of stopping voting fraud. The only difference of note between Protestants and Catholics was that more of the latter were in favour of ID as a useful/easy means of identification.

The table below give responses that were mentioned by 5% or more.

Base: all in favour of Identity Cards	2003
Reasons for being in favour:	%
To stop illegal immigrants	15
To help combat crime/enforce law and order	12
To prove who you are/to be able to identify yourself	12
To help stop fraud	12
For safety/security	8
If you are genuine/have nothing to hide then there's no problem	8
So that we know who a person is/if they are genuine	8
Easy/useful means of identification	7
To stop under-age drinking	6
Keep control of the population/know who/where people are	5
To help people prove their age	5

The 13% of respondents not in favour of the introduction of identity cards were also asked to give their reasons why they were against them. The main reasons given were to do with the threat to civil liberties and privacy, mentioned in one way or another by half of those against identity cards, and doubts about their efficacy or their necessity (mentioned by almost four in ten).

The only real differences from December's results among those in GB was an increase in the proportion of respondents who were against the introduction because they could be lost, stolen and/or used fraudulently (from 2% to 10%) and a decrease in the proportion of respondents who simply did not feel that there is a need for them (down from 14% to 7%).

Differences in response between those in NI and the rest of the UK and, in Northern Ireland, between Protestants and Catholics were more a matter of expression than of substance. For instance, more in NI than GB said they were an invasion of privacy but fewer said that it was too much like big brother.

Responses of 5% or more are listed in the table below.

Base: all against the introduction of Identity Cards	344
Reasons for being against:	%
An invasion of privacy	18
Too much like 'Big Brother'	11
Could be lost/stolen and used fraudulently	10
An invasion of civil liberties/rights	10
Don't need it/no need for it	7
Already got enough ID cards e.g. driving licence	6
They already have enough information on us/know enough about us	6
Waste of time/won't make any difference	5
Too much Government control/interference	6

WHAT WOULD MAKE PEOPLE MORE FAVOURABLE TOWARDS IDENTITY CARDS

Respondents were presented with a list of possible benefits from the introduction of identity cards and asked to say which, if any, of these would make them more favourable to their introduction.

The benefit which had the most widespread potential to influence attitudes favourably was the reduction of fraud, followed by identity fraud.

There were two differences of note from the December survey among GB respondents: an increase (from 51% to 56%) in the number who would feel more favourable if ID cards put people off trying to enter the country illegally, and an increase of a similar magnitude (from 45% to 50%) who would feel warmer towards them if it made it more difficult for illegal immigrants to get work.

The hierarchy of response, as can be seen in the table below, was very similar amongst those against the cards as it was amongst the total sample and those in favour of their introduction, although predictably, as they were against their introduction, there were far fewer saying that their views would be swayed by these potential benefits.

Compared with GB, those in Northern Ireland were less likely to be persuaded by their potential for deterring people from entering the country illegally (45% in NI compared with 56% elsewhere) or by making it more difficult for illegal immigrants to get work (35% in NI, 50% elsewhere) and more likely to be swayed if they helped prevent electoral fraud (48% in NI, 33% elsewhere). Within Northern Ireland, for each potential benefit there were fewer

Catholics than Protestants who said that this would make them more favourable towards the introduction of ID cards and there were more Catholics (8%) than Protestants (3%) who said none of these possible benefits would make them more favourable towards their introduction. The other difference between the two was that more Catholics (7%) than Protestants (3%) said that they did not know.

	All Respondents	All for ID Cards	All against ID Cards
Base:	2921 %	2303 %	344 %
Proportion who would be more in favour if ID cards:			
Helped reduce fraud	65	73	34
Helped protect your identity from fraud			
i.e. stopped somebody pretending to be you	57	65	25
Put people off trying to enter the country illegally	55	62	29
Made it more difficult for illegal immigrants to get work in the UK	50	57	23
Made it easier for citizens to access public services	35	39	19
If it helped to prevent electoral fraud	33	38	14
None	7	2	32

AMOUNT PEOPLE WOULD BE PREPARED TO PAY

Respondents were asked to say – by choosing an amount from a list presented to them – how much they would be prepared to pay for an identity card if, like a £33 passport, it lasted for ten years.

49% of all respondents (up from 45% in December among those in GB), 43% of those in favour and 79% of those against, were not prepared to pay anything. Just under a fifth (18%), were willing to pay less than £10, a quarter (23%) between £10 and £20, and 7% claimed that they were willing to pay more than £20 (4% did not know). There was little difference in response by demographics, even by social grade, which because it is a rough indicator of affluence, might have been expected.

There were some minor difference between NI and the rest of the UK. Compared with GB, fewer respondents (44% in NI, 49% elsewhere) who said that they were willing to pay nothing, more (27% in NI, 17% elsewhere) were willing to pay less than £10 and fewer (25% in NI, 30% elsewhere) were willing to pay £10 or more.

The researchers advised that there is sometimes a tendency for people to say in response to a question like this, what they would rather do than, as the questions asks them, what they would be willing to do i.e. they might be willing to pay but they would prefer not to. Therefore the question could be underestimating the willingness of people to pay for an Identity Card.

Black and Minority Ethnic groups (BMEs) Polling

INTRODUCTION

Research was carried out in March 2003 to establish attitudes towards identity cards among BMEs (Black and Minority Ethnic groups) in Great Britain. 200 interviews were conducted with each of the following minority ethnic groups:

Black African/Caribbean
Indian
Pakistani/Bangladeshi
Chinese

A similar survey was carried out in February amongst a representative sample of the adult population aged 16 plus. Results are compared with this earlier survey in order to see the extent to which the views of the four ethnic minority groups differ or are similar to those of the (mainly white) general public.

QUESTIONS ASKED

Questions 1-3 remained exactly the same, but questions 4 and 5 were amended as below:

Q.4 Which of the following, if any, would make you more favourable towards the introduction of identity cards?

01: If it made it more difficult for illegal immigrants to get work in the UK

02: If it helped to reduce fraud

03: If it put people off trying to enter the country illegally

04: If it made it easier for citizens to access public and financial services

05: If it helped protect your identity from fraud (i.e. stopped someone pretending to be you)

06: If it helped to confirm your lawful residence in the UK

(DK) (N)

Q.5 How concerned, if at all, would you personally feel about any of the following if ID cards were introduced?

01: The Government holding too much information about you

02: Being singled out to prove your identity more often on the grounds of your ethnicity

03: Your card could be copied/forged

04: It would cost you too much

01: Not at all concerned

02: Not very concerned

03: Fairly concerned

04: Very concerned

KEY FINDINGS FROM POLLING

- Support for ID cards was lower among BMEs than among the general (mainly white) public. Opposition was greatest among Afro-Caribbean respondents with over a quarter against, and almost as prevalent amongst people of Pakistani/Bangladeshi origin with a quarter against. The proportion of people of Chinese origin against ID cards was not dissimilar to the general population (16% c.f. 13% respectively) but their level of support was lower (68% compared with 79% of the general public – accounted for by the higher proportion of people of Chinese origin who were ‘don’t knows’). The total for and against among the sample of people of Indian origin was virtually identical to that of the general public but their support was less adamant, as indeed it was among all the BMEs – they were more likely to be in favour rather than very much in favour.
- Ethnicity does not appear to be a major factor in the less positive views towards ID cards among BMEs, although there were some mentions of discrimination, especially by Afro-Caribbeans, when those against ID cards were asked why they were against them. Most of those opposed were against them for other reasons (the same reasons as the general public), namely that they believe that they will not work, that they are unnecessary, that they are a threat to civil liberties or an invasion of privacy. Even though many expressed concern, again particularly people of Afro-Caribbean origin, when prompted with the possibility that ID cards may result in them being singled out to prove their identity, other potential negative issues elicited similar or, in respect to the card being forged or stolen, greater levels of concern.
- Despite the lower levels of support for ID cards among BMEs, a clear majority of each of the four minority ethnic groups were in favour of their introduction. Even among people of Afro-Caribbean origin who had the highest proportion opposed, twice as many were in favour as were against.

WHETHER IN FAVOUR OF THE INTRODUCTION OF IDENTITY CARDS

Respondents were asked to say to what extent they were in favour or against the introduction of identity cards in the UK.

Ethnic group:	Afro-Caribbean	Indian	Pakistani/ Bangladeshi	Chinese	General public
Base all respondents:	210 %	202 %	216 %	203 %	1897 %
Very much in favour	14	23	15	17	35
In favour	42	56	48	51	44
Against	17	9	14	12	9
Very much against	10	6	11	4	4
Total in favour	56	79	62	68	79
Total against	28	15	25	16	13
Don't know	16	6	12	16	8

As can be seen from the table above, Indian respondents' views were similar to those of the general population with more than three quarters in favour and 15% against, although they were less likely than the general public to hold strong views in favour i.e. more said in favour rather than very much in favour.

People of Chinese origin, with two thirds in favour and 16% against were, after the general population and the people of Indian origin, the ethnic group that was most supportive of the proposal to introduce ID cards. People of Afro/Caribbean origin was the ethnic group most opposed with 56% in favour and just over a quarter against; the Pakistani/Bangladeshi group was only slightly more positive with just over six out of ten in favour and a quarter against.

REASONS FOR BEING IN FAVOUR OF IDENTITY CARDS

Ethnic group:	Afro-Caribbean	Indian	Pakistani/ Bangladeshi	Chinese	General public
Base all in favour:	117 %	154 %	135 %	139 %	1508 %
To help stop fraud	19	11	10	5	12
To prove who you are/to be able to identify yourself	16	12	21	20	12
To help combat crime/enforce law and order	15	11	4	5	12
Easy/useful means of identification	12	19	9	19	7
Keeps control/track of the population/ know who/where people are	11	5	9	4	5
In the event of an accident or for a medical reason	10	1	2	3	3
So that you know who a person is/ if they are genuine	9	19	5	9	7
Would make life easy for everyone/ Government/police/save a lot of problems	7	10	4	8	3
Will not have to carry lots of other forms of ID	6	–	1	10	–
If you are genuine/have nothing to hide then there's no problem	6	2	6	2	8
To help stop illegal immigrants	6	8	8	10	16
For safety/security	5	7	7	6	9
Good idea	3	10	14	8	4
To help people prove their age	2	3	1	4	5
Seen them work abroad/have them in other countries	1	1	–	10	1
To stop under-age drinking	1	–	1	2	6
Convenient/convenience	1	2	1	9	1

Respondents in favour of the introduction of identity cards were asked to say why they were in favour. The table below gives the main unprompted responses that were mentioned by 5% or more of any of the samples.

There were some variations in response by ethnic groups but on the whole the majority of responses from each sample were to do with the prevention of crime (helping to stop fraud, combating crime and enforcing law order, stopping illegal immigrants), the provision of

identification (proving who you are, an easy means of identification, proving others are who they say they are, keeping track of people – knowing who/where people are), for convenience (convenient, will not have to carry lots of other identifications, would make life easy for everyone/for the authorities).

Other reasons given for supporting ID cards were: for safety and security, if you are genuine/have nothing to hide there's no problem, good idea, helpful in the event of an accident/for medical reasons.

REASONS FOR BEING AGAINST IDENTITY CARDS

Ethnic group:	Afro-Caribbean	Indian	Pakistani/ Bangladeshi	Chinese	General public
Base all not in favour:	59 %	33 %	63 %	33 %	241 %
Don't need it/no need	25	21	6	22	7
Discriminatory	15	9	3	–	2
Not a good idea/don't like the idea	13	6	14	5	2
Already got enough ID cards	12	16	13	5	6
An invasion of privacy	9	16	18	6	18
Too much like a police state	7	–	–	–	2
Waste of time/won't make any difference	6	1	4	3	5
Could be lost stolen/used fraudulently	6	11	2	19	10
Too much trouble/hassle	6	5	5	6	2
Don't know or understand why	5	–	5	10	–
Too much government control/interference	4	5	5	–	5
Too much like big brother	4	2	3	–	11
Loses freedom	4	2	10	–	1
An invasion of civil liberties	3	5	4	–	10
They already have/know enough information on us	3	–	5	10	6
Don't know what information will be held on them	2	6	1	–	1
What would happen if it was forgotten/not on me	2	–	5	7	–
Don't want/agree/like the idea of having to carry it everywhere	1	11	–	–	–
Could be copied/faked forged	1	–	3	7	3
Everyone would know who you were	1	–	–	5	–

The main reasons against identity cards were that they are not needed (no need, already got enough ID cards), that they will not work (waste of time/won't make any difference, could be forged/stolen), and that they threaten civil liberties and freedom. Others were against them simply because they did not like the idea. There were also some mentions of practical difficulties – having to carry them around, forgetting to carry them, too much trouble/hassle.

There were relatively few respondents who said that they felt that ID cards were discriminatory – 15% of Afro/Caribbeans, 9% of Indians, 3% of Pakistani/Bangladeshis, and 2% of the general public.

WHAT WOULD MAKE PEOPLE MORE FAVOURABLE TOWARDS IDENTITY CARDS

Respondents were presented with a list of possible benefits from the introduction of identity cards and asked to say which, if any, of these would make them more favourable to their introduction.

Ethnic group:	Afro-Caribbean	Indian	Pakistani/ Bangladeshi	Chinese	General public
Base all respondents:	210 %	202 %	216 %	203 %	1897 %
If it helped to reduce fraud	53	63	54	48	65
If it helped protect your identity from fraud	50	70	46	46	57
If it put people off trying to enter the country illegally	33	47	33	33	56
If it helped to confirm your lawful residence in the UK	33	50	41	39	NA
If it made it easier to access public and financial services	26	37	24	30	35
If it made it more difficult for illegal immigrants to get work in the UK	25	41	34	29	50
None	10	3	4	4	7

Compared to the general public, fewer BMEs would be more in favour of ID cards if they prevented illegal immigration and illegal immigrants working. For all samples, including the general public, the two benefits which had the greatest potential to make people more favourable were the reduction of fraud and the protection of identity.

People of Afro-Caribbean, Pakistani and Bangladeshi origin, followed by people of Chinese origin were less likely than the general population to feel more favourable towards ID cards if they resulted in the possible benefits listed above. However, this could be because they had greater proportions of people against the idea and these people, in all samples, were less likely to say that anything would make them look more favourably towards their introduction.

CONCERNS ABOUT IDENTITY CARDS

BME respondents were asked to say how concerned they are (on a scale from very concerned to not at all concerned) about a number of possible disadvantages of ID cards. The table below lists the proportions very and fairly concerned and the total of these i.e. the proportion to some extent concerned.

Ethnic group:	Afro-Caribbean	Indian	Pakistani/ Bangladeshi	Chinese
Base all respondents:	210 %	202 %	216 %	203 %
The government holding too much information on you:				
Very concerned	29	23	29	12
Fairly concerned	24	30	30	31
Total concerned	53	53	58	43
Being singled out/prove your identity on the grounds of your ethnicity:				
Very concerned	42	24	29	13
Fairly concerned	28	36	30	30
Total concerned	70	60	59	44
That your card could be copied/forged:				
Very concerned	62	55	45	37
Fairly concerned	21	27	28	31
Total concerned	83	82	73	67
That it would cost too much:				
Very concerned	35	28	30	21
Fairly concerned	29	40	33	32
Total concerned	65	68	63	54

Concerns were highest for all disadvantages amongst the Afro-Caribbean respondents and lowest amongst the Chinese respondents.

Concerns about racial discrimination – being singled out to prove your identity on the grounds of your ethnicity – were most evident among Afro-Caribbean respondents, with 42% very concerned and in total over 70% concerned. However for each BME group there were more people concerned and more very concerned about their card being copied or forged than there were concerned and very concerned that they would be discriminated against because of their ethnicity.

CHAPTER 3: QUALITATIVE RESEARCH

Focus group research commenced in November 2002. Cragg Ross Dawson were commissioned to conduct the qualitative research on our behalf. 15 groups covering different income groups, locations around the UK and ethnic minorities were run.

Findings confirmed that most people who participated were broadly in favour, the term identity card was preferred to entitlement card, and those who are opposed were very hostile and unlikely to change opinion. There was some reluctance to pay for cards via fees – but some acceptance when participants were reminded that they pay for passports and driving licences already.

The two main concerns were that the cards would be used to discriminate against ethnic minority groups and that the Government would hold too much information about people in one place.

Detailed findings have been produced in a 54-page document, plus appendices. This is being placed in the public domain via our website.

Below are extracts from the findings, covering a summary of the main findings and the conclusions and recommendations.

Summary of Findings from Focus Groups

THE CONTEXT

News items in the public mind at the time of the fieldwork included a mix of national and international issues and gossip around public figures and celebrities. These changed over the period of the fieldwork, illustrating the ephemeral nature of much news. Identity cards were mentioned unprompted by one respondent.

Asylum seekers and immigration were sometimes raised unprompted at this stage, and were clearly not far from the surface for many people, both white and those from ethnic minorities. Most were concerned about the effects of immigrants arriving in the UK, at national and local levels.

Underlying these and other concerns was an impression that many respondents felt the order and structure of life in the UK were breaking down. Established institutions no longer commanded respect and this resulted in an impression of diminishing national identity. This was sometimes linked directly to immigration and asylum seekers.

OVERALL RESPONSE TO IDENTITY/ENTITLEMENT CARDS

Awareness and initial reactions

Awareness of identity cards was scattered; with prompting, many thought they had heard about identity cards of some type, with varying functions and purposes, issued by a range of organisations. A few had heard of fingerprinting being used to check identity and age in banks and bars.

Initial reaction to the idea of identity cards was varied. Many respondents were immediately accepting, some were immediately rejecting and most had queries and concerns. Those who were more positive felt that individuals and society would benefit; those with the greatest reservations believed the main beneficiary would be the state.

Of the alternative descriptors, *Identity cards* were largely preferred because it was familiar, though it had some negative associations. *Entitlement cards* was thought superficially softer and warmer, but less familiar and 'weasely'. From this point on in the discussions the idea was considered in terms of identity cards.

At this stage many respondents assumed the idea had been introduced as a government response to concerns about asylum seekers and illegal immigration, and/or terrorism. Some felt that these concerns were now so strong that identity cards would definitely be introduced; others believed that the idea had been raised by successive governments in the past and always dropped, and so did not expect it to go ahead now.

Differences between sample segments

Reactions to the idea varied between different sample segments. The majority of white British respondents welcomed it. They felt that in addition to tackling asylum, illegal immigration and terrorism it could help combat benefit fraud and other crime. A few who were themselves on benefit had reservations that identity cards might stigmatise them. A small minority of white British people (all lower income bracket) was initially strongly in favour of the idea for reasons to do with their openly racist views; they subsequently became less keen as they considered what it would mean for themselves.

A 'white liberal' minority was firmly against the idea of identity cards. They associated identity cards with repressive regimes and felt they would give the government too much control over individuals, alienate and exclude minorities and discriminate against asylum seekers in genuine need of help. People from ethnic minorities appeared to be cautiously accepting of the idea, but shared the concerns of the 'white liberal' minority and worried that cards might be used by the police to justify increased street checks on them.

In Northern Ireland attitudes were slightly different in that immigration and asylum were less significant concerns, and people were more accustomed to being asked to produce identification.

Initial queries and concerns

A range of questions and concerns was expressed after the idea of identity cards was first introduced. These were to do with: whether cards would be compulsory; whether all residents would have to have them (British and non-British, homeless people); what their primary function would be; and how information would be accessed using the cards.

The fact that most European countries used identity cards of some kind was surprising, but tended to enhance acceptance of the idea. If they were used successfully and without diminishing civil liberties elsewhere, participants thought they could work in the UK.

NATURE AND FORMAT OF THE CARDS

The initial expectation was typically a dedicated identity card containing limited information. The options of combined identity card and passport or identity card and driving licence for those who wanted them were preferred to a dedicated card, and were thought more sensible and more functional. Familiarity with driving licence cards helped people understand how the cards might look. The combined identity card/driving licence was generally preferred to the passport option, primarily because driving licences were more likely to be carried on a day-to-day basis than passports, and had less special status. This was also possibly because people were more familiar with photocard licences than passport cards which have yet to be introduced.

INFORMATION ON THE CARD AND ON THE DATABASE

Information to be included

This was a crucial consideration in acceptance or rejection of the idea of identity cards. Those most in favour felt there should be a wide range of detailed information, including criminal record, DNA details and previous addresses. Those who had the strongest reservations thought cards would only be acceptable if they contained the briefest of

information – name, photo and date of birth. Some who had initially accepted the idea became more negative as suggestions for more detailed information were put forward.

When it became clear that there would be a database containing information relating to the card, the tendency was to prefer only limited information on the card, and more detail on the database, with caveats about the security of the database. The general feeling was that information on the card should be restricted to name, date of birth and a photograph. Some respondents also felt a personal ID number would be useful; most rejected the idea of addresses being included, primarily for security reasons. The inclusion of signatures was acceptable to most, but was thought vulnerable to forgery.

Other information was expected to be on the database, not the card. Nationality was acceptable to most, but prompted concerns among some from ethnic minorities and people in Northern Ireland. Employment status was considered important, given the need to combat illegal working – although the term was not understood by all participants. Response to the inclusion of health information was ambivalent: some felt it could be useful and might even be life-saving; others regarded it as intrusive. The possible use of biometric information was treated with caution: those most keen on identity cards felt it would offer totally secure proof of identity; those who were less keen worried that it was too personal.

Access to the database

This was another key consideration. People who were well disposed towards identity cards in principle accepted the possible confidentiality risks inherent in a database and seemed unconcerned. Others, especially those with in-principle objections to identity cards, were worried about hacking and card fraud.

BENEFITS OF THE IDEA

The general view was that identity cards would be more of a benefit than a hindrance to the law-abiding majority of the population. Benefits identified without prompting were: tackling the problem of illegal immigration, with consequent saving of money; reducing benefit fraud; easier confirmation of identity to allow faster checks on eligibility to work in certain occupations; easier verification of age; streamlining access to public and commercial services; and combating violent crime.

Response to other suggested benefits was varied. Combating identity fraud was thought to have some merit, though identity fraud was not universally understood. Efficient access to services was accepted but seen by some as limited, and prompted some concern about controls on eligibility to medical services. Combating crime was also accepted, with caveats

about the types of crime that might be prevented. Easier electoral registration was welcomed by voters. Easier travel in Europe was not regarded as a significant benefit, and having fewer cards to carry was not particularly motivating.

DISADVANTAGES OF THE IDEA

A number of disadvantages were raised unprompted, often in initial reaction to the idea. Some saw it as potentially restrictive and bureaucratic, especially the 'white liberal' minority. They were also concerned that it would stigmatise minority groups. Many people were anxious about what would happen if their cards were lost or stolen. There were worries about the security of the database and the consequences of illegal access. Some were concerned that commercial organisations would gain access to and abuse the database.

Other suggested potential disadvantages also prompted reservations. The security of the database, if not already mentioned, was acknowledged at this point, particularly in relation to biometric, health and financial information. The scale of the task in setting up an identity card system was thought a potential problem among a significant minority. A few also felt that the system would inevitably be abused by criminals; and that it was unnecessary since driving licences effectively performed the same function.

UNIVERSAL VERSUS VOLUNTARY

The issue of whether identity cards should be voluntary or universal, if introduced, prompted mixed feelings. Those most in favour felt the idea would only work if cards were universal, and saw little point in making them voluntary. The minority with strong reservations regarded the idea as acceptable only if cards were voluntary. Some among the ethnic minorities felt that universality signalled that cards would be used to keep checks on them.

COST AND FUNDING

Funding appeared to be a contentious issue. The initial assumption had generally been that identity cards would be funded by 'the government'. When people were told that there might be a charge, response varied. A substantial minority, particularly those who were keen on the idea of identity cards in principle, accepted this and considered it fair and reasonable. The remainder felt it was entirely unreasonable, given that, as they saw it, the main beneficiary would be the government. Some felt so strongly that they lost their initial enthusiasm for the idea.

Conclusions from Focus Group work

This text is extracted from the focus group research report.

THE CONTEXT

There are signs of concern over a declining sense of order and structure in society, exacerbated by a perception of rising crime, loss of respect for law and fundamental rules of civilised living. In addition to this there is growing concern about terrorist threats from within and without the UK.

Immigration (legal and illegal) and asylum seekers are major worries, and are linked to issues around loss of order and respect, crime and the terrorist threat. For most white British people and some among the ethnic minorities, feelings about immigration are focused on what appear to be genuine concerns for the stability and future security of the country.

RESPONSE TO THE IDEA OF ENTITLEMENT/IDENTITY CARDS

Overall response to the idea largely reflects the context described above. There is general acceptance that there would be a benefit in “(re)-imposing order”, with reservations about the detail of the scheme; and there is resistance among the few with concerns about the effect on individual freedom and state control.

For the accepting majority, identity cards represent a means by which the perceived loss of order and structure might be halted, and offer hope of a return to more secure times. They are not seen as a panacea but as something which could have both tangible benefits in tackling the problems and symbolic value in providing reassurance.

The impression is that underlying general acceptance of the idea is a feeling (unspoken) that after repeated discussion and dropping of identity cards, now might be the time finally to go ahead and introduce them: in spite of reservations, circumstances now demand it.

Initial reactions are also characterised by uncertainty and a plethora of questions and queries, especially in relation to the likely applications of the cards, practicalities and security of information. If the idea is pursued, it will be important to be clear about all these issues from the outset.

Given the generally favourable response to identity cards in principle, there is likely to be widespread acceptance of them being universal (to have, though not to carry) rather than voluntary. The objecting minority will express loud resistance to this but the popular belief is that voluntary cards will be a pointless half-measure.

Nevertheless, it will be important to make the case clearly for universality, and consider the implications for the cards' name: objectors feel the idea is only acceptable if the card is voluntary and that the spirit of 'entitlement' does not fit with universality.

- If the idea is introduced, take-up of a combined identity card and driving licence seems more likely than take-up of a combined identity card and passport. Driving licences fit better with the concept of a card which can be carried and used on a day-to-day basis, and carry fewer of the negative associations of identity cards.
- In relation to information carried on the cards and in the database there is a tension between maximising the value of the idea and minimising worries about security and privacy. The strategy of storing only basic information on the card will help acceptance, but there will need to be convincing reassurance about other aspects of information.
- In particular, people will need to be persuaded that the database will be secure against hacking, forgery, fraudulent use and illicit commercial access, and that there will be strict controls on access among legitimate users and measures to prevent accidental cross-access.
- It will also be important to inform people that the more personal information that could be in the system will not be mandatory (particularly health information), and that there will be simple, usable procedures in the event of cards being lost (emergency stop number, quick replacement).
- Responses to the possibility of individuals paying for identity cards are not clear cut. Individuals have always paid for driving licences and passports; government funding means we pay for them anyway, albeit indirectly; there will be exemptions and discounts for the less well off. If the benefits of an identity card were explained, paying for the card could probably come to be seen as acceptable.
- The short term approach of 'start-up' funding by government and subsequent individual funding might be a sensible compromise.

PROMOTING AND PRESENTING THE CARDS

- Once the nature and format of the cards is settled, initial public reaction will be determined to a large extent by the terminology used. On balance, *identity card* is likely to come across as more understandable and frank than *entitlement card* but the bigger benefits over and above identity issues will have to be spelled out.
- The option of presenting the idea as driving licence plus identity card is more widely acceptable (to the majority with driving licences), but does not include the dedicated identity card for those without driving licences.

- In presentation and promotion of the idea, it will be important to communicate that the intention is focused on the common good, not on benefits to any one party, and that the cards are intended for us all to make our lives easier and more secure.
- Ideally, promotion of identity cards should aim to foster a sense that benefits for individuals are synonymous with benefits for the state, and that the cards are not to help government control or pry. It will also be important to prevent the racist minority 'hijacking' the idea, and to communicate that the cards are not a tool to discriminate against immigrants, ethnic minorities, the homeless or benefit claimants.
- It may be worth considering the thought that support for identity cards equates to voluntarily participating in society, and a way of expressing self-inclusion – a positive statement of belonging at a time when it is important for people to be mutually supportive. By implication, rejection of the idea could be seen as tantamount to a refusal to participate or belong.
- It will be useful to refer to positive experiences in other countries, particularly in relation to the feasibility of setting up the scheme, its benefits and any cost efficiencies resulting from the introduction of identity cards.

Research – August 2003

Further research was commissioned with Cragg Ross Dawson in August to examine:

- awareness and perceptions of identity cards in principle
- response to basic information about how they might work
- unprompted expectations of the price of identity cards
- response to possible price levels, in isolation and in light of potential benefits of identity cards
- feelings about free or reduced-price cards for people on low incomes; and about the option to pay by installments

60 qualitative interviews, covering three UK locations, different social groups; gender; ethnicity; age and lifestyle; and employment status.

Summary of Findings and Conclusions from August 2003 Research

PERCEPTIONS OF IDENTITY CARDS

- awareness and acceptance of identity cards appears to be growing: the idea is becoming familiar and members of the public are becoming more receptive to the prospect
- there is still a rejecting minority who will be difficult to convince: they feel strongly that there are moral and social problems with the idea, and they are a highly vocal sector
- there was a wide range of knowledge and opinion about the potential benefits of identity cards
- those with greater knowledge tended to focus on the social benefits, particularly issues relating to illegal immigration and asylum; they tended to be among the most enthusiastic
- many others had not and did not consider anything other than the personal advantages identity cards might bring, but were quick to acknowledge the wider benefits
- the rejecting minority objected to identity cards on principle but also complained that there would be risks in ensuring that the information was not abused, either by hackers or by government itself
- even among the more accepting public there was much concern about the logistics of setting up and maintaining the system, and about security: ensuring that the system cannot be hacked, and preventing forgery and fraudulent use of cards

PAYING FOR IDENTITY CARDS

- the issue of card holders paying for their identity cards prompted very mixed views: some accepted it without question; many had not thought about it but did not object; and a small minority strongly rejected the idea
- among the great majority who accepted the principle of paying, estimates of reasonable costs also varied widely but tended to be uninformed and unconsidered
- the key issues in coming to a view on reasonable costs are:
 - expected benefits of identity cards – to self or society
 - precedent, particularly prices of passports and driving licences
- except among the most enthusiastic, it is crucial to remind people of the likely gains, personal and social, and to inform them of passport and driving licence prices

- when people were fully informed, price expectations were as follows:
 - 10 year identity card combined with driving licence or passport:
 - ▶ about half - £30-£50
 - ▶ most of remainder – under £30
 - ▶ small number – over £50
 - ▶ handful – no fee
 - 5 year identity card combined with driving licence or passport: approximately 60%-70% of 10 year card
 - 10 year identity card only:
 - ▶ about one third – £20-£30
 - ▶ about a quarter – £10-£20
 - ▶ about one third – no fee or under £10
 - ▶ small number – over £30

OTHER COST ISSUES

- the offer of concessions for those on lower incomes was largely accepted, especially for pensioners and disabled people on benefit
- most who were not on low incomes thought it reasonable to pay a little more to fund concessions
- the option of paying in installments was considered useful, though not necessary for most
- if offered, the general preference was for cash-based installment payment or deduction from benefit
- concerns were expressed about several aspects of ID cards, given the likely card options:
 - losing value of existing passport or driving licence
 - having to renew ID card/driving licence; cf existing driving licence
 - need to carry passport or driving licence in addition to combined card

CHAPTER 4: OTHER SURVEYS

The following Part covers other inspired samples or surveys of opinion carried out independently by various bodies and organisations and submitted to the Home Office as part of the response to the consultation exercise. They include focus group work, polling and opinion surveys, and e-mail campaigns. The responses from e-mail campaigns are not representative of the population as a whole. They are distinguished from individual responses on the grounds that other people who have responded have shown some personal initiative after seeing reports in the media or because of their general interest in the subject matter.

YouGov/Mail on Sunday

4-5 July 2002, sample size – 1686

An opinion poll conducted by YouGov appeared in the Sunday Mail at the very beginning of the consultation period. The poll was conducted on-line with a representative sample of 1,686 electors and showed that, at that early stage, two out of three people were in favour of an identity/entitlement card scheme. On all the topics raised in the poll there was support for a scheme, even on the most controversial issues – with support at over 50% for rejecting the notion that it would not be worth the money or that it would give the Government too much power to interfere in people's lives.

Teletext Poll

17 January 2003

Teletext customers were asked:-

“Home Secretary David Blunkett favours a universal identity card that could cost £20 a head.

Do you back this idea?”

2,124 responses were received, with 64% in favour and 36% against.

BBC Online

22 January 2003

The Morning show carried out a poll asking:

“Would you carry an ID card?”

12,323 votes were cast by phone, interactive television and the internet. 89% said yes, and 11% said no.

The Observer

The Observer on 27 April 2003 reported 86% of people in favour of an identity card as part of a broader survey on crime.

Conclusions

The outcomes of the two representative polls show a consistently high level of support for the general idea of the introduction of an identity card. This is broadly in line with the outcome of our own quantitative surveys, which have shown roughly three-quarters of people in favour of a card scheme. The Teletext and BBC Online polls, though showing similar results, were not representative of the population.

INTERNATIONAL STUDENTS – FOCUS GROUP WORK UNDERTAKEN AND SUBMITTED BY THE BRITISH COUNCIL

As part of the stakeholder work conducted with race and young people's organisations and the liaison with DfES, a meeting was held with representation from the British Council. As a result, it undertook to conduct focus group work to gather views of foreign students in the UK on the introduction of an entitlement card scheme.

Three sessions of approximately an hour each were held with two groups of 9/10 and one group of 4 young foreign students studying in the UK. Nationalities included China, South Africa, Vietnam, Nigeria, Kenya, South Korea, Japan, Kuwait and India as well as one British student.

They were facilitated by a member of the British Council. Although background information had been provided, there was no direct input or steer from the Home Office. The British Council concentrated on the following areas in leading the discussions:

CARD SCHEMES IN COUNTRIES OF ORIGIN

Most students had card schemes of some form in their countries, and were accustomed to the concept of carrying identity documents that could be routinely asked for by the police and authorities as proof of identity and nationality. They did not see a problem with the concept of the UK introducing an identity card scheme.

DIFFERENCE BETWEEN ENTITLEMENT AND IDENTITY CARDS

The students accepted the concept that an entitlement card could act as proof of their legal residence and entitlements to particular services whilst in the UK.

WHY BEING INTRODUCED NOW

Most cited the control of illegal immigration and refugees, with crime reduction and the events of September 11 also being frequently mentioned.

WHAT TO BE USED FOR

To be able to distinguish between those lawfully resident and illegal immigrants; to prove entitlement to healthcare and employment; help reduce crime and corruption.

ADVANTAGES

Easier to prove legal status and eligibility to work and healthcare; make administrative processes quicker; easier to provide proof to open a bank account; proof of age to purchase alcohol and gain admission to pubs/clubs; voting; travel in Europe; not having to carry passports as proof of identity; carry less cards.

DISADVANTAGES

Some cited recent programmes on how easily forgeries of documents can be made as in themselves advertising the ease with which forgeries can be made. It was thought there would be a real risk of increased forgeries unless the card was extremely secure.

Being stopped more frequently by the police to produce the card as evidence of identity was raised. It was seen as a potential way to discriminate due to skin colour. If the power to ask for the card is given, then only particular groups will in reality be asked to produce it.

Fear of being locked up if they failed to produce the card was also mentioned.

WHAT TO BE SHOWN ON CARD/ON DATABASE

Most students agreed on less information on the card, with more detail on the database. Views on nationality being shown on the card were mixed, with some feeling that particular nationalities could be singled out for discrimination.

USE OF BIOMETRICS

Most had no problem with fingerprints being taken, apart from some comments on the inconvenience. Most did not like the idea of photographing the iris, although one student was very much in favour. There were some comments on greater risks of identity theft from providing a biometric which could then be stolen.

One commented that the iris biometric of dead people cannot be taken in cases where verification of identity of bodies was required.

AMOUNT OF INFORMATION HELD IN ONE PLACE – CENTRAL DATABASE

Some students had fears of the “Big Brother” concept and also concerns that computer systems can crash and be vulnerable to hackers.

WHERE TO GO TO GET IT ISSUED/HAND IT IN

Embassy abroad; airport; police station, post office; college/university; Home Office; British Council; town hall.

VALIDITY PERIOD OF CARD

In line with stay in UK. Could be handed in, or “turned off” and kept as a souvenir.

POLICE REGISTRATION ISSUES FOR STUDENTS

This was mainly an issue for the British council, but although the students required to register with the police had not experienced problems, they did see that the card system could be incorporated into the police registration system.

CONCLUSIONS FROM INTERNATIONAL STUDENTS’ FOCUS GROUPS

Most foreign students who took part in the focus groups were broadly happy with the concept of having an identity card and saw benefits in being able to more easily prove their entitlements to particular services and prove identity.

However, fear of being singled out by the police and other officials was significant for these particular groups, based on the colour of their skin.

It is also noted that the group's attitudes to iris images was far more negative than their views on fingerprints, whereas the biometrics questionnaires conducted by the Passport and Post Office do not show any marked difference in attitude between these different forms of biometrics.

CONSTITUENCY SURVEY CONDUCTED BY The Rt Hon JEAN CORSTON MP, LABOUR MEMBER FOR BRISTOL EAST

Jean Corston wrote to 110 consultees in August 2002, with the following six questions:

Would an entitlement card system help prevent identity fraud?

Would service providers including local authorities find it useful to allow access to their services through a card system?

Should biometric information such as fingerprints be recorded on the card to help tackle identity fraud?

Should the card be compulsory to carry?

Are existing checks before issuing passports and driving licenses enough to combat the increasing sophistication of fraudsters?

Please include any other issues surrounding the idea of an entitlement card that you believe need to be considered.

30 responses were received from the following sources:

Avon & Somerset Police – Central Bristol District

Avon & Somerset Police – South Bristol District

Avon & Wiltshire NHS

BAND Ltd

Bristol Cancer Help Centre

Bristol China Partnership

Bristol City Council
 Bristol Youth Inclusion project
 Butler House Tenants Association
 Home Start Bristol
 Organisation for Sickle Cell Anaemia Research
 New Stockwood CA
 Relate Avon
 The Wheels Project – Brislington
 Various Area Housing Committee members
 Various individual responses

Responses took two forms, with some being substantive and others simply filling in the questionnaire supplied (the majority of which did not include a name or address). The latter have not been recorded on the database of individual responses received. The responses from the Avon & Somerset Police and Bristol City Council have also been taken into account under their respective stakeholder groups.

Home Office Minister Beverley Hughes attended a follow-up public meeting in Bristol, with Jean Corston, where respondents and others present were given the opportunity to put forward views to the Minister in person.

Summary of Views from Constituency Survey

WOULD AN ENTITLEMENT CARD SYSTEM HELP PREVENT IDENTITY FRAUD?

Of the 30 respondents, 23 believed that some form of entitlement card would prevent fraud. There were some questions raised as to how exactly a card scheme would help avoid fraud. It was considered that this would need further consideration. The need to store the information securely was emphasised, in order to prevent further, new, levels of fraud. There were views that a card scheme would act as a deterrent against fraud

WOULD SERVICE PROVIDERS INCLUDING LOCAL AUTHORITIES FIND IT USEFUL TO ALLOW ACCESS TO THEIR SERVICES THROUGH A CARD SYSTEM?

Questions were raised on how the scheme would be administered in practice. It was presumed that a wide range of services would be linked, in order to warrant the costs of producing an effective and secure card system.

If the information was stored digitally, it was considered this would be a huge saving in terms of administration costs and bureaucracy and save local authorities and the Government money in the longer term.

With particular regard to accessing health services, one view was that it was doubtful whether the production or otherwise of an entitlement card would help, in reality, in influencing whether, for example, emergency psychiatric assessment was provided or not.

SHOULD BIOMETRIC INFORMATION SUCH AS FINGERPRINTS BE RECORDED ON THE CARD TO HELP TACKLE IDENTITY FRAUD?

There were views opposed to biometric information being stored on a card. This was mainly due to the implied criminal associations in providing such data. However, there were also views that its inclusion would help the local authority across all its services to ascertain identity with greater confidence than happens with current documents.

SHOULD THE CARD BE COMPULSORY TO CARRY?

There was a split of views on the benefits of a compulsory card, with a majority favouring a non-compulsory system, which would be compulsory to produce if asked by a relevant authority. The police constabularies were of the view that if a voluntary card system were introduced, this would not assist in the police role as a criminal would merely state that he/she did not have one.

ARE EXISTING CHECKS BEFORE ISSUING PASSPORTS AND DRIVING LICENCES ENOUGH TO COMBAT THE INCREASING SOPHISTICATION OF FRAUDSTERS?

It was generally considered that these documents are not currently secure enough. It was commented on that they would become more so with the inclusion of biometric information.

ANY OTHER ISSUES?

A concern about institutional racism and possible discrimination against Black and Ethnic Minority communities was raised. There were several views expressed about civil liberties issues, with concerns that there may be a hidden agenda behind a card scheme and the need to consider “the small print” before signing up to anything.

CONNEXIONS CARDS – FOCUS GROUP WORK

The Connexions Card is an educational reward card now available across England to all young people between the ages of 16 and 19. Holders can use the card to access a range of rewards such as discounts in their favourite shops.

The Home Office provided some information about the entitlement card consultation to be used in a series of four focus groups, conducted as a market research project on behalf of the Connexioncard.com brand by Capita Consulting. This research took the form of a 15-minute session at the end of each focus group on Connexions Cards.

The groups were made up as follows:

- Two groups each from the North and South of England.
- 8-10 participants in each group.
- All aged 15-19 years.
- Equal balance of gender and mix of ethnic backgrounds.
- Not necessarily Connexions Card holders.

Discussions were centred around the following main areas of an entitlement card scheme:

- Perceived advantages/disadvantages
- Whether it should be combined with passport or driving licence
- Age of issue
- Information which should/should not appear on the card

Summary of views – Connexions Cards Focus Groups

PERCEIVED ADVANTAGES

- Ease of benefit applications – less form filling-in and easier access to benefits.
- Crime reduction – would help prevent illegal immigration and could also help combat fraud.
- Proof of identity – useful proof of identity but there were some comments that very high quality photographs would be needed to make it useful.

PERCEIVED DISADVANTAGES

- Loss/theft – extreme concern was expressed by all four groups about the consequences of losing the card. Also some concern about identity theft.
- Forgery – concern that the card could be faked. Several participants admitted to holding fake EU driving licences.
- Invasion of privacy – general acceptance that there was a “trade off” between privacy issues and the advantages of having a card, particularly on reducing crime.
- Cost – seen by most groups as a potential disadvantage.

AGE OF ISSUE

- Split view as to whether this should be 16 or 18.
- Children should be included on their parents’ cards.
- Split opinion as to whether having a proof of age card was an advantage or disadvantage – wanting to be younger for child discounts and wanting to be older for age-restricted purchases/admissions. Also employment eligibility issues for under 16s.

INFORMATION ON THE CARD

- Personal details – split views on inclusion of home address and phone number. Inclusion of NI number agreed.
- Medical information – general view that emergency medical information should be included, but mixed views about full medical details.
- Criminal convictions – dependent on how secure the information was and who could access it.
- Biometrics – generally considered a good idea to include this, provided there was no health risk in providing it. Some privacy issues were raised in connection with iris scanning and the possible uses the information could be put to.
- Stronger security measures, over and above a pin number.

COMBINING THE CARD WITH PASSPORTS OR DRIVING LICENCES

- Possible loss or theft was an overriding concern in combining these documents.
- More negative for passports as there was a greater fear of loss or theft of this document.
- Comments that a passport card would be better than carrying the passport book.

Conclusions – Connexions Cards Focus Groups

There were a wide range of perceptions, both positive and negative, with no clear consensus in favour or against a card scheme. The most frequently mentioned advantages were ease of benefit applications and crime reduction. The most frequently mentioned disadvantages were the possible consequences of loss or theft, fraud, invasion of privacy and cost.

There was a mix of views as to whether having proof of identity was an advantage or not. There was also some scepticism that an entitlement card would be more difficult to forge than existing cards, which were generally perceived as easy to fake and obtain.

The researchers have reported that there was a lack of prior knowledge about what the entitlement card consultation covered, so the views expressed should be considered more as general attitudes to the concept rather than informed opinion. Many questions were generated as a result of the sessions, indicating a wish for further information.

STAND E-MAIL CAMPAIGN

Towards the end of the consultation period, privacy groups encouraged people on their emailing lists to respond to the entitlement cards consultation by visiting the STAND web-site. This was an already established web-site, previously known to emailing list recipients and had not been set up specifically for entitlement/identity card issues.

On accessing the web-site, users could either compose their own email or use a number of standard paragraphs, with arguments against the introduction of a card scheme, to include in an email message. They were also invited to include their name, postal and personal email address. All the emails were physically sent from the web-site rather than from each individual's account.

As a result, 5031 emails were received via the STAND web-site in response to the consultation exercise. These responses are broken down as below:

In favour of a card scheme	44	1%
Against	4856	96.5%
Suspected duplicates/false emails	131	2.5%
TOTAL	5031	

Summary of STAND responses

The main areas for the arguments against the introduction of a card scheme, covered in the standard paragraphs provided by the privacy groups, and most frequently identified by those using their own text were as follows:

- **Cost of the card** – views expressed regarding whether a card system would be cost effective, and the amount of money that would be wasted in implementing a scheme that would not work.
- **Compulsory cards** – there were strong views that a universal card would become de-facto compulsory, with access to services depending on production of a card and a legal obligation to have one.
- **Data protection issues** – views that there would be insufficient safeguards to protect personal details, with accounts of previous abuses of criminal records.
- **The integrity of information** – concerns about potential problems restricting access to a database which would hold details of tens of millions of citizens.
- **Helping prevent identity fraud** – strong doubts that a card scheme would achieve this. The more value cards had, the higher the attraction they would have for corruption and forgery. There would be criminal elements who would succeed in finding ways to forge them or acquire them illegally.
- **Combating illegal immigration/working** – strong doubts that a card scheme would help prevent this. Unscrupulous employers would continue to employ illegal workers, regardless of the legality of their practices. 'Black markets', by definition, operated illegally and a card scheme would simply be just another hurdle placed in their way.
- **Biometrics** – views that biometric information would not work. This was technology that was insufficiently tested to provide universal coverage. It was not considered sufficiently mature or reliable; the costs of implementation were not justified by the benefits; and it would not be acceptable to the public.

- **Abuse of a card scheme will go unpunished** – concerns that there was no apparent consideration of including criminal sanctions for unauthorised access or use of individuals' data. It was considered that there should be far greater punishments for that type of abuse than for offences such as not advising the correct authorities of changes to personal details.
- **No mention of the intention to introduce a card scheme in the Labour Party manifesto** – it was considered that, as a universal card scheme would be a major change for the country, it should be an issue that the country should be able to vote on. It would therefore be more appropriate to include it as part of Labour Party policy for the next election.

CHAPTER 5: BIOMETRICS DEMONSTRATION SUITE

The results of the evaluation questionnaires gathered by the United Kingdom Passport Service (UKPS) during the demonstrations of iris and fingerprint biometrics are summarised below. These pull together the responses to all the questionnaires received from the iris demonstrations at London, Glasgow and Belfast passport offices and Knightsbridge post office during the consultation (October 2002 – January 2003) and at Durham, Peterborough, Liverpool and Newport passport offices after the consultation (February – April 2003). The results from the fingerprint demonstration at the London passport office in January 2003 are also incorporated.

Although this data is very useful, it was not possible to select a representative group to take part according to age, sex, race, affluence etc. This is because the people participating had already arrived for a personal visit to a passport or post office on a particular day.

Some people omitted to fill in all the relevant boxes. Many people took the opportunity to use more than one option box for each question, which could more accurately reflect their views without being too restrictive.

Consolidated Results

- Iris Demonstrator in London, Belfast, & Glasgow passport offices and the Knightsbridge Post Office, October 2002 – January 2003 (V1)
- Iris Demonstrator in Durham, Liverpool, Newport, & Peterborough passport offices, February – April 2003 (V2)
- Fingerprint Demonstrator in London, January 2003 (V2)

Q1:

Male	740	40%
Female	1100	59%
No answer	29	1%
TOTAL	1869	

Q2: Age

16 – 30	624	33%
31 – 50	846	45%
Over 50	349	19%
No answer	50	3%
TOTAL	1869	

ID Fraud

Q6 (V1) and Q3 (V2): Are you concerned that someone might use your identity, e.g. to obtain a credit card in your name?

Yes	1417	76%
No	339	18%
Don't know	106	6%
No answer	7	0%
TOTAL	1869	

Biometrics

Q7 (V1) and Q4 (V2): Would you like the opportunity to establish your identity more securely using your own unique biometrics in the way you have seen today?

Yes	1604	86%
No	59	3%
Not sure	188	10%
No answer	18	1%
TOTAL	1869	

Q8 (V1) and Q5 (V2): How do you feel about providing biometric information? (Fingerprint and iris combined)

I am comfortable with it, providing the technology and data is secure	1634	87%
I would not want to provide my biometric information	48	3%

Q9 (V1) and Q6 (V2): Please indicate what you found positive and/or negative about providing biometric information

Positive:

The process took less time than expected	1050	56%
The process is less intrusive than expected	668	36%
It would increase the security of my document	1217	65%

Negative:

The process took too long	38	2%
I would not want to have to make a special visit to apply for a card	224	12%
The process is too intrusive	34	2%
I am worried the information will not be stored securely and reliably	529	28%
I am worried about how the information might be used	726	39%

Entitlement Cards

Q4 (V1) and Q7 (V2): How do you feel about the possible introduction of entitlement cards:

Everyone should have entitlement cards	1212	65%
Entitlement cards should be issued on a purely voluntary basis only	334	18%
Entitlement cards should be produced to obtain government services	287	15%
Entitlement cards should not be introduced	28	1%
Don't know	119	6%

Q11 (V1) and Q8 (V2): How do you feel about the passport /driving licence possibly being used as a basis for an entitlement card scheme?

I am comfortable with either, providing technology and data is secure	1308	70%
I think it should be a separate card	420	22%
Don't know	118	6%

Q12 (V1) and Q9 (V2): Whether you are for or against entitlement cards, please say which of these you think is/are the strongest reason(s) for SUPPORTING the introduction of these cards:

It will help prevent identity fraud	1582	85%
It will help prevent benefit fraud	1091	58%
It will help prevent illegal immigration and illegal working	1074	57%
It will help reduce crime	717	38%

Q13 (V1) and Q10 (V2): Whether you are for or against entitlement cards, please say which of these you think is/are the strongest reason(s) for OPPOSING the introduction of these cards:

The government will hold too much information about me	375	20%
Government agencies may share confidential information about me	425	23%
It's an infringement of my civil liberties	165	9%
The costs will outweigh the benefits	137	7%
Concerns about the feasibility of the required computer system	295	16%
Concerns about the government's ability to run such a scheme competently	734	39%
No answer	382	20%

Summary of total responses to biometrics questionnaire

A total of 1869 individual responses were received. 65% felt that everyone should have entitlement cards, with only 1% stating that they should not be introduced. 70% were happy with the idea of entitlement cards being linked to passports and driving licences.

The strongest reason for supporting a scheme was to prevent identity fraud (85%), with over 55% also citing benefit fraud and preventing illegal working/immigration. The strongest reason for opposing a scheme was concern about the feasibility of the required computer system (39%)

The vast majority (76%) were concerned about someone else using their identity e.g to fraudulently obtain a credit card. Over 85% wanted to take the opportunity to establish their identity more securely using biometrics and were comfortable about providing it, as long as the technology was secure (whether fingerprint or iris).

Over half thought the process of providing the biometric took less time than expected.

The area of most concern was on how the biometric information might be used (39%).

CHAPTER 6: STAKEHOLDER GROUPS

The stakeholder groups we contacted included consumer groups; education groups; elderly peoples' groups; employers' organisations; financial services; the Information Commissioner; IT industry; Local Government; the Media; minority ethnic groups; other countries which operate schemes; police organisations; Post Office; privacy campaigners; refugee organisations; retailers; rural groups; young people; groups representing people who may find it hard to participate in a card scheme e.g. people with disabilities, travellers and homeless people. All those who responded are listed at Annex 1 with the exception of those organisations which requested anonymity.

In this chapter, a summary of comments made on each set of consultation points is provided for every stakeholder group. The length and detail of each summary depends on how many stakeholders have responded and the detail of the response. Many groups have restricted comments to the consultation points which are most relevant to them, whilst others have responded to all points.

Some stakeholder groups, such as travel organisations and employers groups, cross over and could sit in either category. Also, some groups involved in race and refugee matters also have a wider remit. Other groups have written in separately as well as being represented by umbrella organisations, such as the police associations.

Views on the subject matters specific to stakeholder groups, such as immigration matters, policing, young people, access to services and many more have also been submitted by various other interested organisations and individuals not directly approached by the Home Office. These have also been recorded and taken into account, and many appear in the sections covering views expressed by the general public.

To provide the fullest flavour of views, the following summaries take account of **all views expressed** by the stakeholders on all the consultation points, where these have been provided, and do not deal exclusively with the points of particular relevance to each stakeholder group. The groups appear here in alphabetical order.

1 GROUPS REPRESENTING PEOPLE WITH DISABILITIES

Distribution and contact

Copies of the consultation paper were sent to 10 organisations. We received 3 responses which are summarised here – ‘Helping Charities, Helping People (HCHP),’ ‘Rethink’ and some members of the public. Royal National Institute for the Blind (RNIB) provided a report on user requirements for cardholder identification, authentication and digital signatures.

During the consultation period, officials gave a presentation to RNIB. A copy of our summary was produced in large print for an individual who requested it, and a summary of the paper was sent on tape to the British Institute for Learning Disabilities (BILD) and a member of the public.

Summary of Views of these Stakeholders

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

Responses were generally negative.

Rethink did not see the need for an entitlement card (which they thought was a way to make ID cards more palatable) as they felt that most people have enough documentation to establish identity. They did not see a card as providing more efficient services or being more convenient ‘rather they are identity cards to tackle illegal immigration and fraud.’ They were not in favour of requiring everyone to register in order to ‘catch the small minority who are either illegal immigrants or fraudsters.’

Rethink felt that a central database would be a ‘gross intrusion into personal privacy’. They did not favour information sharing and ‘there would be a significant cost in setting it up and maintaining it with little likelihood of efficiency savings being made’.

HCHP had a number of concerns about entitlement cards. They were worried that a delay in obtaining cards could result in delays in accessing services and thought that charities will experience an increase in demand for their services as a result. They thought this would be a particular problem regarding asylum seekers.

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

Rethink could see the advantage in having 'an acceptable document available to prove identity' but said this needed to be set against the disadvantages of entitlement cards and the likelihood that 'public bodies would insist on their being produced where identity does not have to be proved at present.'

Rethink did not think the card was necessary to prove age and suggested using a birth certificate.

Rethink were concerned that many people with severe mental illness may not be able to afford a card. This group are largely reliant on services (e.g. NHS services, benefits, housing agencies, voluntary organisations) and so would need a card to access services. They suggest making the card available free of charge to those who rely on services but who cannot afford to pay. Many letters from the public have also suggested this.

Rethink had concerns about sharing information between Government departments and regarded it as a 'gross intrusion into personal privacy.' They felt there would be significant cost to set it up and maintain a database 'little likelihood of efficiency savings being made'.

COMBATING IDENTITY FRAUD (CONSULTATION POINTS 18-22)

No substantive comments were received.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

HCHP did see a use for an entitlement card in the area of reducing employers' compliance costs but only if more secure than other types of identity. They were unsure of the suggested 'hierarchy of ID documents.' They did not see identity checking as their role and made the point that this was the province of police/immigration officials.

Rethink considered that biometrics would be too intrusive and had concerns about the safety of iris scanning. They felt the taking of fingerprints had very strong associations with the criminal justice system and should not be used.

Rethink were concerned that a card might disclose mental illness which would add to the discrimination suffered by those with this condition.

Rethink raised concerns as to how the scheme would affect people with a severe mental illness and thought it would be impossible for some people with severe mental illness to apply or use the cards as many ‘lose the capacity to cope with their daily living tasks’. Rethink described how many people live rough, many experience paranoid thoughts (and therefore do not want to be identified through a card) and many lead chaotic lives (and so lose belongings or could forget to carry a card.) Rethink did not feel that people who rely on service provision should have to pay for the card.

Rethink were of the view that inferences would be drawn if someone was arrested and was not carrying an ID card. They were also worried that people would be denied services where cards were lost or stolen and thought the reassurance that this would not happen were ‘a bold aspiration.’

This view has also been reflected in general public correspondence. There were some strong concerns about how physically and mentally disabled people would be affected. Some views were that these sections of the population would find it much more difficult than at present, when claiming benefits and obtaining financial and other services. Concerns were also expressed as to how people with learning disabilities would afford a card as ‘the majority of people with learning disabilities are on income support.’

However, there has been some correspondence from people with disabilities who would find a card useful. Some has come in as a response to the low-cost airlines requirement to show photo ID on domestic flights. Others felt it would improve access to services.

“As I am disabled and have to live on benefits I feel that I am in a good position to make comment. One of the main problems for a claimant, such as myself, seems to be the never ending supplying of proof of identity and entitlement that goes hand in glove with claiming the benefits that I am entitled to. My greatest hope would be the issuing of one piece of identity that would settle all my problems in one go i.e. that I only have to produce one card to prove who I am and what I am entitled to.”

Name supplied, London

2 ELECTORAL ISSUES

Distribution and contact

Although not targeted as a specific group, responses were received from The Electoral Commission; the Association of Electoral Administrators (AEA) and the Electoral Matters Panel.

Summary of Views of these Stakeholders

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

The favoured option for an entitlement card was a universal or compulsory card where the holder would be encouraged to carry the card at all times, although the Electoral Commission did not offer any view on the issue of principle.

The AEA felt that any compulsory scheme would probably discourage registration but improve choice on methods of casting a vote. If the scheme remained voluntary then the register will remain a hybrid, as would any future attempts to introduce more technological voting systems. It would be appropriate to pilot in a mix of local authority areas to assess the viability of registration by entitlement card first.

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

The Electoral Commission, in particular, centred its response around Point 16, inviting views on whether a card scheme would benefit the electoral register and facilitate new ways of voting.

It was considered that any benefits to the electoral processes would largely depend on what type of card was introduced; the number of people who carried it; the checks used to establish identity for issuing of the card; and how the card and information would be used.

“If a system were adopted whereby an entitlement card were to be a smartcard with a photograph, signature, unique number and biometric data stored in the chip, and its use was universal (which could only be achieved by making it compulsory to have one) then a number of benefits in an electoral context could be envisaged.”

The Electoral Commission

However, the Electoral Commission went on to warn that anything below this specification would have a reduced effect accordingly.

If individual registration was introduced, then an entitlement card could assist Electoral Registration officers in providing a secure means of establishing identity. Details of age, residency and citizenship would be useful in determining a person's entitlement to be included on the registers of electors for parliamentary and local elections.

However, it was considered that the central database holding information on card holders would not cover everyone entitled to vote if participation was voluntary. Also, it would cover those who were not entitled to vote, such as certain foreign nationals and young people.

The Electoral Commission were of the view that a card scheme might be useful in directing information with regard to registration to young people or other groups which are traditionally under-registered. It would support the development of opportunities to promote registration in that way.

In order for a card scheme to prevent, deter or identify personation at polling stations, the card itself would have to be produced at the point of voting. This was currently the position in many other countries.

Use of a card system in postal or electronic voting would need to involve the use of identifiers rather than physical presentation of the card. It was considered that, provided the identifiers and procedures were rigorous, this system could provide for a greater degree of scrutiny of applications to register and vote remotely.

COMBATING IDENTITY FRAUD (CONSULTATION POINTS 18-22)

No substantive comments were received.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

No other substantive comments were received on these points.

DATA PROTECTION AND PRIVACY ISSUES (CONSULTATION POINT 35)

The AEA felt that restrictions on access to personal data would need to be strictly enforced.

3 EMPLOYMENT ISSUES

Distribution and contact

Copies of the consultation paper were sent to The Confederation of British Industry (CBI), the Trades Union Congress (TUC), the Scottish Trades Union Congress (STUC) and 15 other smaller business associations as well as many transport organisations (detailed under Transport and Travel Organisations in Chapter 15). Many of these are represented by the CBI or the TUC. The response of the Transport and General Workers Union is also summarised in Chapter 15.

Before and during the consultation period, officials met the CBI and the TUC on three occasions each, and both organisations agreed to continue liaison after the end of the consultation period.

The TUC did not submit a written response to the consultation. Responses from the CBI and the STUC are summarised below:

Summary of Views of these Stakeholders

Neither organisation covered all of the consultation points, but concentrated on the areas of particular relevance to them – mainly point 12 on illegal working and immigration. The CBI was in support of the objectives of a scheme, whilst the STUC was strongly opposed.

OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

The Scottish TUC was opposed to the introduction of any identity card scheme, especially a compulsory one.

*“... every member of UK society should be entitled to access to public services without being forced to display an Entitlement or ID Card ... and the cost of such a scheme **should not** be at the expense of the delivery of public services, or to individuals who participate in such a scheme...”*

... There is a real danger of Identity Cards being used to further discriminate against those who are Black/minority ethnic.”

STUC

The CBI supported the objectives of an entitlement card scheme but had concerns about implementation.

“The entitlement card scheme could bring significant benefits to UK business, as a tool in the fight against illegal working, helping to reduce identity and benefit fraud and making public and private service delivery more cost-efficient...

... Enforcing legislation and moving forward with policies of managed migration and re-skilling could achieve the objectives behind the scheme.”

The CBI

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

The CBI welcomed improvements in public services, but its members have found it difficult to conceptualise the practical benefits of a card scheme at this early stage.

It is envisaged that private companies such as banks would want to retain their own cards and allow customers to choose how to access their services.

The CBI commented that the card could prevent some instances of fraud or make prosecution for this offence easier. Success would depend on the security of the application process and the integrity of the central database.

The most relevant consultation point for this stakeholder group is point 12 – whether a card scheme would be an effective measure to combat illegal working and immigration.

The CBI stated that the main issue with illegal working is the failure of a small minority of employers to follow existing legislation, due to disregard for, or lack of knowledge of, the law. It commented that it supported the Government’s renewed commitment to prosecute companies under Section 8 of the Immigration Act. However, it felt that enforcing current legislation and moving forward with policies of managed migration and re-skilling could achieve the objectives behind the entitlement card scheme.

The CBI pointed to current initiatives such as the new guidance for employers on the Prevention of Illegal Working, which it is contributing to through the Steering Group to Tackle Illegal Working. There should be wider publicity of available sources of information such as the web site and telephone helpline for employers.

It is felt that a requirement for all employers to verify entitlement cards would increase the amount of working time spent on employee checks. It is also pointed out that the card

would present further complexity for employers during the lengthy transition period, when the card is in the process of being issued to all UK residents on a universal basis. Problems are also envisaged if there were delays in issuing new cards or replacing stolen cards – this would lead to delays in taking on employees who were without a verifiable card.

The STUC saw no clear purpose for the introduction of a card scheme, which is not already carried out by other existing cards. It considered that efforts should be made in ensuring that existing schemes and forms of identification are more accessible to the population, particularly for deprived communities who may have no access to bank accounts, credit cards, driving licences or passports. Such forms of identification are taken for granted whereas those without it often face social exclusion.

The STUC believed that there should be no extension of police or Government powers to enforce any card scheme.

COMBATING IDENTITY FRAUD (CONSULTATION POINTS 18-22)

The STUC stated that if a card scheme went ahead, the minimal amount of information should be captured on the card. Other forms of identity such as passports, NI cards, driving licences and medical cards should not be integrated into an entitlement card as it is considered that this would increase risks involved in identity fraud, which can never be fully eradicated.

The STUC stated that the information on the cards should be kept on a confidential basis and should not be given out under any circumstances to the private sector for commercial activity or gain.

The CBI commented that the card itself could become the focus of illegal activity, making fraud easier for those obtaining a card legally but then using it for fraudulent activity.

“Illegal use of these cards would not only invalidate the system but create a far greater security threat than we currently have.”

IT company member of the CBI

The application process would have to be rigorous to prevent this, and therefore costly. It was thought that private sector companies such as mortgage lenders would want to guard against fraudulent applications by requesting a secondary means of identification, thus putting into question the value of the card as a stand-alone means of confirming identity.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

Point 34 – on compliance costs for employers – is the most relevant consultation point for this stakeholder group. The CBI was of the view that a card scheme could mean additional costs for employers and little overall savings. The total costs as set out in the consultation paper are “*at best indicative*” and would be dependent on the final version of the card and any recovery of costs. There were concerns that net costs incurred by the scheme would ultimately be passed onto individuals and business through increased taxes.

The CBI considered that a card scheme could impose additional costs on UK employers carrying out employee recruitment checks. Staff would need to be trained to recognise the new form of identity and the features of an authentic card. If visual checks were not satisfactory, employers would be required to purchase cardchecking equipment or incur telephone charges for an authentication service. It is the view that any such service should be free, especially as the aim is to make employers more vigilant in carrying out checks.

The STUC were of the firm view that if a card scheme was introduced, it should be strictly voluntary only and be used to enhance and enable the access of those who are not “ID rich” to key financial and public services.

DATA PROTECTION AND PRIVACY ISSUES (CONSULTATION POINT 35)

The STUC confirmed that it was very important that a card scheme fully complied with all the rules set out within the Data Protection Act 1998.

It also commented on the lack of written constitution of the UK that sets out the boundaries of Government involvement in private citizens’ lives, and that the UK Government had already used the National Security/Public Safety get-out clause of the current human rights legislation. The UK Government should be subject to the same provisions of the Human Rights Act as any other public body.

4 FINANCIAL SERVICES

Distribution and contact

Several copies were sent to each of 3 main organisations, for onward distribution. The responses from 6 are analysed here – the Building Society Association (BSA) (joint response with CML), The Council of Mortgage Lenders (CML) (joint response with BSA), the UK Fraud Prevention Service (CIFAS), the Association for Payment Clearing Services (APACS), the British Bankers Association (BBA) and the Financial Services Authority (FSA). Not all these groups were sent the paper direct.

Two others also responded but have asked that the details of their responses are kept confidential.

During the consultation period, officials with the Association of British Bankers (ABI), APACS, BBA, CIFAS, and the FSA to discuss proposals regarding an entitlement card scheme and the work programme on identity fraud.

Summary of Views of these Stakeholders

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

Views were broadly positive with some reservations about the maturity of biometrics.

Responses mentioned the obligation placed on financial institutions to ‘know their customer’. Each made reference to the fact that there is no simple way of validating the identity of an individual and that no single method of identification is sufficient.

“Availability of a simple and robust method of proving an individual’s identity is the key to the fight against crime and terrorism and the protection of consumers.”

FSA

Responses mentioned that the benefit for the financial services industry is reduction in identity fraud (which leads to financial fraud) and that, provided the security features of a card scheme and checks in relation to identity were sufficiently robust, an entitlement card backed by population database would be of ‘substantial benefit’ to UK’s anti-money laundering regime. CIFAS stated that other countries with ID cards report lower levels of ID fraud.

All responses supported a universal scheme as complete coverage would enable financial institutions to streamline their identity verification processes. The BSA and CML stated they would not support a compulsory scheme and that a voluntary scheme would be less cost effective as financial institutions ‘would need to run dual identity verification processes.’ All groups favoured a population register but did not want it limited to public services.

“Provided that the security features incorporated into the entitlement card scheme as well as the checks in relation to the issuing of cards were sufficiently robust, an entitlement card, backed by a population database would be of substantial benefit to the UK’s anti-money laundering regime by creating a universal, simple, and reliable system for authentication of ID and address.”

FSA

All responses stressed the importance of a stringent application process and made the point that if this were not secure, the problem of fraud would be exacerbated. The card itself must have strong security features and there would need to be secure system communications between the front end user organisations and the central database.

FSA felt that entitlement cards could be a useful way of facilitating access to the financial system for the disadvantaged who often find it hard to prove identity and address and so do not approach financial institutions. It felt existing methods of establishing identity are becoming increasingly unreliable and risked losing credibility and support in the financial industry (who are required to verify the identity of those with whom they deal) and their customers (who are expected to prove their identity). It felt the establishment of a ‘simple, single and realisable means by which individuals can verify their identity’ was important and that the lack of a sole proof of identity put the UK at a ‘competitive disadvantage’ due to the costs involved in checking various documents to comply with the money laundering regulations. They also mentioned the fact that it is also costly to train staff to recognise a wide variety of different documents and that financial institutions have to have systems in place to deal with people ‘who cannot reasonably be expected to provide any of these documents.’ A ‘significant number’ of new customers cannot provide any reliable means of identity and FSA felt that this problem would increase as direct payments of state benefits is rolled out.

Responses received were in favour of a unique personal number.

APACS commented that Government liability for service providers who rely on the entitlement card would impact on whether service providers made it the exclusive way to access their services. They felt that there should be Government liability or exceptions for institutions that

have relied on an entitlement card as the introduction of an entitlement card would take control away from the banks and other financial organisations to make decisions about identity for themselves. These organisations would be relying on the Government's registration and enrolment process and procedures.

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

Some organisations that responded did not think it would be prudent or practical to offer payment applications alongside government applications on the same card. Amongst other reasons cited was that the payments industry typically issue cards on 2-3 year cycle. It would also make it difficult for the consumer to change service provider simply and promptly. A multi-purpose scheme would be more complex and costly, with a greater likelihood for abuse. The banking industry would be concerned if their ability to issue their own cards to customers were compromised. There were also issues associated with the fact that individuals often have more than one credit/debit card and increasingly wish to be able to change their service provider simply and promptly.

A number of responses mentioned that one of the most valuable aspects of a card scheme is the capability to assert identity over the internet. It was considered that strong and secure authentication credentials, as potentially offered by this card if it were smart-card based, could be the enabler for the delivery of more advanced on-line financial services to new customers.

COMBATING IDENTITY FRAUD (CONSULTATION POINTS 18-22)

A number of organisations mentioned that quality of application, registration and enrolment processes for passports and driving licences should be strengthened whether or not the Government goes ahead with a card scheme. It was also mentioned that other issues, such as delivery method of these documents and control over lost and stolen documents needed to be considered.

All responses favoured the idea of private sector organisations being able to check applications against a database.

A number of organisations supported the creation of a new criminal offence of identity fraud as it 'would mean the fraud could be tackled before there is a financial loss' though one mentioned they would not want any additional burden placed on financial institutions to provide information to the police when investigating fraud.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

There were views that a family of cards would encourage people to apply but might be confusing for service providers.

BBA favoured a single card rather than a family of cards, which would be more confusing for all parties, and more costly to produce, issue and maintain.

It was generally felt that cards should be issued at the 'earliest opportunity' with 'life-events added on a non-mandatory basis'. Young people should be issued with a card that included their National Insurance number.

On biographical checks, APACS, BBA and FSA considered that the application process would be vital. If this was weak, then an entitlement card scheme would exacerbate fraud rather than solving it. APACS favoured use of cryptographic techniques and storing data on a chip. BBA said checks should be proportionate, useful, feasible and appropriate.

On biometrics, most respondents were interested and saw the usefulness but were unconvinced as to practicality or cost.

"Useful to ensure that one person does not establish more than one identity in the scheme but unsure as to technology. APACS have considered biometric use for payment applications (which would require close to 100% accuracy) but decided against them due to rate of false positives/false negatives, the lack of a global standard, the need for face-to-face transactions that' would slow down the process and preclude on-line applications."

APACS

APACS also advised the Government to use multi-factor processes (e.g. PINs and tokens) as well as biometrics if this was to go ahead.

APACS favoured a smartcard and highlighted its usefulness in asserting identity when using the Internet. However, the BSA and CML favoured a simple card, as this would fulfil the function of identifying the cardholder. It was felt that a more sophisticated card would be less likely to be acceptable to members of the public, would be more costly to produce and would be more valuable to thieves. The BBA favoured a chip card and/or use of biometrics.

Some groups would like to be able to further validate any card against a database, as comprehensive data-sharing would maximise any benefits of an entitlement card in helping

to prevent and detect fraud. Others mentioned that it would be desirable to have access to register for money laundering prevention and credit risk assessment purposes.

Some groups felt that there were sound arguments for deploying digital certificates on a smart card. It was also raised that associated costs of achieving this would be relatively small when spread over the potential number of cards. A PKI (Public Key Infrastructure) would need to be established and that would require implementation to 'very strict security standards.' It was also felt that it would be important to ensure certificates are not shared as these could be exploited.

With regard to people who might find it difficult to participate in a scheme, it was suggested that it might be useful to look at ways in which people with disabilities, or who are not mobile, or who live in sparsely populated areas are able to vote, complete the census or apply for benefits. It was felt that a multi-function entitlement card could be very useful for people in these situations.

On employers' compliance costs, only FSA mentioned this. As an employer, FSA has to check that people in certain positions are 'fit and proper' under money laundering regulations. It would therefore favour a card scheme linked to a population database in order to improve efficiency of vetting procedures.

DATA PROTECTION AND PRIVACY ISSUES (CONSULTATION POINT 35)

It was generally considered important for safeguards and controls to be introduced in line with the Data Protection Act 1998. There was a suggestion that there should be a legal obligation to require a cardholder to update information.

5 HOMELESS PEOPLE

Distribution and contact

No responses have been received from Homeless organisations. Copies of the consultation paper were sent to Homeless Link who agreed to distribute to their membership on our behalf. Copies were also sent to Shelter, The Salvation Army, Crisis, and St Mungo's.

6 INFORMATION COMMISSIONER

Prior to the publication of the consultation paper, the Home Secretary liaised with the then Information Commissioner and during the consultation period (15 January 2003) he spoke at a seminar on entitlement cards hosted by Richard Thomas, the new Information Commissioner. Home Office officials also met the Commissioner's officials on a number of occasions before, during and after the consultation period.

A full and detailed response has been submitted by the Information Commissioner, including a 30-page consideration of each of the 35 consultation points and a covering summary of his views. The response is welcomed and valued and has been studied carefully. The Commissioner has made it available to the public under separate cover.

In particular it has been noted that the Commissioner has said that there are no insurmountable privacy and data protection obstacles to a scheme. It is not considered that a scheme would be impossible to establish within data protection laws but the Government would need to be more explicit about what the scheme was for, the legislative framework and consider the possibility of additional powers to oversee the scheme.

For the purposes of this paper, we provide comprehensive extracts from Richard Thomas' 6-page covering summary.

Summary of Views of the Information Commissioner

"The consultation paper poses some 35 separate questions and I have responded to each of these from the perspective of my statutory functions in relation to the Data Protection Act 1998 and the Freedom of Information Act 2000. However, the answers to the individual questions do not add up to a clear indication of my overall view and this is set out below.

I have approached this matter with an open mind but with great caution because, as I have mentioned previously, we are dealing with matters touching on the very nature of the society in which we live. We must recognise that we may risk turning our society from one where the need to prove identity is commensurate with the service on offer, with complete anonymity being a real option in many circumstances, to one where the highest level of identity validation becomes the norm for the most mundane of services, one where we run the risk of the unique personal number being used to track our various interactions with the state and others, and to have all this recorded on a central register under its control. Of course, nothing in the government's current proposals is so draconian. But we must appreciate that, whilst we may

be reassured that benign administrations will live up to their promises about limitations as to use, we will be creating a potentially powerful infrastructure. Our close European neighbours can account for how this can be misused at catastrophic social cost.

... many of our European neighbours do have identity cards and population registers though not on the scale envisaged in the government's consultation paper. Many have had these for some time and unlike in this country, where such measures in the past have been treated with suspicion and as something only to be adopted in times of national emergency, they have become an unquestioned feature in society. They all do have data protection and human rights legislation and I have asked national data protection commissioners about their experiences of the more limited schemes in their countries. There is a fairly consistent response that these cause no significant difficulties to them in data protection terms. In some instances this could be because their particular schemes predate data protection legislation and this has taken account of their existence when introduced but the lack of widespread problems helps to reinforce my view that there is no inherent reason why all such proposals would be unacceptable on data protection and human rights grounds. The question is: will the particular scheme meet the necessary data protection requirements?

Turning to the government's proposals, I face a real difficulty in knowing what the scheme that is being proposed really amounts to. The consultation paper puts forward a diverse range of purposes ranging from reducing identity fraud to aiding voter registration, from facilitating access to government services to assisting emergency medical treatment. The consultation paper does not rest at the currently identified potential purposes but solicits suggestions for even more, particularly from the private sector. The existence of so many potential options makes it impossible to come to any firm conclusion as to whether the benefits would outweigh the risks to privacy, human rights and social values quite apart from the financial costs.

The absence of a limited and clearly defined purpose, or set of purposes, causes a number of difficulties for those wishing to respond:

- those of us charged with looking at whether the proposals are proportionate to the problems individuals and society face find it impossible to come to such a judgement and are left with severe reservations about the other potential uses, many of which appear to be almost makeweights;
- those of us who wish to identify the specific safeguards cannot do so because the purpose of the scheme has not yet been adequately determined;
- those worried about costs find these difficult to calculate with many suspecting a significant underestimation and a consequent financial imposition on individuals;
- those with technical and project management expertise suggest that this is a recipe for failure at the project level.

I believe that without a much more restricted and closely focused group of purposes there would be substantial risks attached to these proposals proceeding. If the government decides to pursue such proposals then a second more narrowly focused proposal should be consulted upon through a White Paper accompanied or followed by a draft bill. I also believe that there may be merit in divorcing what appear to be twin concepts in the consultation document, the existence of both an entitlement card and a central register, possibly a national population register. It does not follow that these have to go hand in hand and both have significant issues attached to them in their own right and are worthy of separate scrutiny.

Although the diversity of potential purposes has complicated matters, the consultation paper does nevertheless allow initial consideration of some of the safeguards that will have to be put in place and these are set out below.

I am concerned that although there may be plausible arguments made for the introduction of an entitlement card scheme in the short term there is the potential for function creep as administrative and political priorities change or even just to maximise the use of a costly infrastructure. Establishing a scheme on the basis of particular pressing needs in a way that would permit its subsequent use for other less desirable or unwarranted purposes would be of serious concern. To help guard against this I welcome the government's assurances about putting any scheme on a statutory footing but I do not think these assurances go far enough as they envisage the use of secondary legislation for changes. I am concerned to minimise any function creep in the future and that the mechanism of primary legislation should be necessary for any such changes to be implemented. Such legislation must include strong effective restrictions against inappropriate demands on an individual to produce their card for inspection by others. It should be remembered that it is not the simple possession of a card that may have an impact on individuals; it is placing them in the position of having to identify themselves by use of it that may be the cause of real concern.

I also believe that leaving responsibility for the administration of the scheme and any central register(s) with a government department is not a sufficient safeguard. Any scheme and register should be under the control of a new independent statutory body accountable to Parliament for the conduct of its functions. If an entitlement card scheme is established, there will need to be a substantial educational programme to ensure individuals and service providers understand the circumstances where a card should or should not be used. This educational role could also be given to the suggested independent body.

I also feel that if identity fraud is the central concern, then insufficient consideration has been given to whether other card issuers such as financial institutions, could have a role to play

in identity verification, particularly as the use of private sector databases is envisaged for this purpose, and card issue. This would remove the need for a monolithic central register. This may also provide opportunities for including digital certificates to provide safeguards for on-line transactions.

Turning to the arrangements for establishing a scheme, it is proposed that the driving licence and proposed passport card should form the bulk of the cards issued, amended to reflect the needs of the entitlement card scheme. This has a number of significant difficulties attached to it. I am concerned that the existing collections of data held particularly in the case of the driving licence, were not compiled with identity verification in mind. The existing quality of the data will be inadequate for the issue of entitlement cards without substantial enrichment. This will be an essential requirement. The government recognises this and has suggestions about the utilisation of its own information and the use of credit reference agency information to show economic activity to help root out false applications before the issuing of cards. I remain concerned that there may be an unrealistic view of the value of this sort of information particularly where individuals are young, involved in limited economic activity or have been absent from or are newly arrived in the UK. The extent to which electoral roll information may be of value has also been overestimated.

If an entitlement card scheme was introduced the card itself would be viewed as having an unrivalled status in terms of identity verification. It may be relied upon as the definitive proof of an individual's identity and other particulars relating to them. If this is the case it must be established and maintained with reliable and high quality data. Extreme care must be taken to ensure that existing data and documents used as part of the issuing process are up to the necessary standard and can be relied upon. The potential for mistakes and errors being introduced during the processing of applications or the maintenance of the scheme should not be underestimated. The consultation paper recognises that the card itself will become the target of forgers and counterfeiters. To fail to address these matters would run a risk of individuals suffering serious detrimental effects in the variety of circumstances where they may be required to use an entitlement card.

If a reliable indicator of identity is the core aim of the scheme then it should seek to achieve this aim in the most reliable way. It is recognised that the inclusion of a biometric encrypted on a smartcard chip would be a way to link identity to a particular person by way of a 'unique' physical characteristic. To put in place the necessary infrastructure will be expensive but any scheme must be fit for its identified purpose. If the necessary infrastructure cannot be put in place then this calls into question the value of the card as a reliable and strong validator of identity.

Turning to the card itself, the use of a function specific card such as the driving licence poses real concerns when additional information is endorsed upon the face of it. This runs the risk that organisations may be tempted to capture this extra information and this would be intrusive. The information endorsed on the front of any card must be kept to a bare minimum with extra information encrypted on to the smartcard chip and only available for view by those who need to know it. Such an entitlement card's aim should be limited to identifying an individual in order to gain secure access to the necessary information held securely elsewhere.

The security arrangements surrounding an entitlement card scheme would have to be robust given its own potential to be turned to the advantage of the identity fraudster. In addition to the need to ensure that cards are only issued to bona fide applicants, the range of information appearing on a card could be at real risk of perpetuating, rather than reducing, identity fraud. Including so much detailed information, such as address and various identification numbers, on the face of a card that will be used in many circumstances runs the risk that this may gain greater currency and be used to gain unauthorised access to information about that individual if it falls into the wrong hands.

If a central register is to be established then the information contained within it should be the minimum necessary to permit the efficient functioning of the entitlement card scheme. This should not include details of the particular services being sought and any audit trails of access should not be available for any other purpose than identifying misuse.

The issue of what are the appropriate safeguards again stem from what are the purposes for which it is intended to be used. It is clear there needs to be strong prohibition on the misuse of entitlement cards, the information held on them and the central register in addition to those safeguards provided by the Data Protection Act 1998. It has been suggested that a new criminal offence of identity fraud be created. Great care needs to be taken to avoid criminalising the assumption of a fictitious identity to preserve anonymity in legitimate or inconsequential circumstances.

In addition a number of data protection provisions could be strengthened. The consultation paper recognises that any unique personal number needs to be designated as an identifier of general application under the Data Protection Act 1998. This should include safeguards against wider use. My powers in respect of inspection could also be extended to ensure specific and proactive scrutiny of the operation of the scheme. Enforced subject access to any data held on the smartcard chip and central register should also be prohibited. Given

that an aim of the scheme would be to make identity fraud much harder a compensatory review of existing legislation facilitating data matching could be undertaken to see if such privacy intrusive powers are still warranted.

In conclusion I am of the view that it is not appropriate to take the stance that an entitlement card scheme should never be proceeded with on the grounds that there will always be insurmountable privacy and data protection obstacles. It may be possible to establish a scheme with the necessary data protection safeguards in place. However, I am not satisfied that the current proposals would lead to establishing a data protection compliant scheme. A much more focused proposal needs to be brought forward with greater safeguards in relation to the quality, amount, and adequacy of the data in relation to those narrower purposes. However, and most significantly, any new proposals need to have much more reliable safeguards against function creep over time, with strict legislation and independent control being crucial features. The government made clear in its consultation paper that for any entitlement card scheme to be established it must address data protection requirements. These are not optional features but mandatory legal safeguards. Should government decide to take forward its proposals I would be happy to work with government to help ensure that only a scheme that is fully compliant with data protection legislation is developed.”

Richard Thomas

Information Commissioner

7 INFORMATION TECHNOLOGY ORGANISATIONS – REPRESENTED BY INTELLECT

Distribution and contact

Several letters and submissions were received throughout the consultation period from various IT companies detailing their products/services and how these could be applied to a card scheme in the UK.

Intellect is the IT industry's trade association, representing the UK's information, telecommunications and electronics industries. Both before and during the consultation period, officials participated in a series of public consultation sessions with Intellect (October 2001, February, May and October 2002). We saw this as the fairest way to exchange views with potential suppliers.

The other companies which contacted us direct were advised that they may wish to contact Intellect to consider how they might participate further in Intellect's work.

Intellect have submitted a response on behalf of the I.T industry as a whole and for the purposes of this summary, we have concentrated on that response.

Intellect

In preparing its response to the consultation, Intellect held meetings of a working group created for the purpose of guiding it. The group's membership included suppliers of cards, security technologies and integration services.

“This is potentially an extremely significant project, however it is important that it is not undertaken in isolation. Therefore, there is a need for the project to be driven in line with other Government initiatives such as the e-Government programme, the NHS IT Strategy and initiatives arising from the PIU study into data-sharing and privacy and issues on data storage and manipulation arising from the Anti-Terrorism Crime and Security Act and the Regulations of Investigatory Powers Act consultations.”

Summary of Views of Intellect

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

Many potential advantages were seen if a card scheme were to be built on the platform of a “gold standard” enrolment process, with greater convenience for citizens and a higher level of security, without increasing the level of regulations on organisations and at reduced cost. It was pointed out that the success of any card depended on the data provided to it.

On targeted schemes, it was considered that the speed with which a card scheme could be introduced would determine the pace at which the benefits of the scheme could be realised. In addition to applications for driving licences and passports, other life-stage activities for entitlement card enrolment could be applying for a place in higher education; taking up employment in government or the armed forces; applying for employment in a registered profession; or first time applicants for state benefits/pensions. However, linking the scheme in with passport and driving licence applications guarantees public uptake without incurring huge additional costs to Government and the taxpayer.

On the implementation of a voluntary or a universal scheme, it was pointed out that the pros and cons are well set out in the consultation document. However, a comprehensive assessment of the relative risks should be taken into account such as public acceptability and practicality of implementation. An example was given of whether a universal card scheme would ultimately be as unpopular and carry as much criticism as a compulsory to carry scheme. Also, the risk of campaigns of non-conformance with a universal scheme could be regarded as more significant than that of lack of uptake for a voluntary scheme. A possible approach may be to start with a voluntary scheme and move on to a mandatory scheme at a later point.

A suggested approach was one where a service provider would not necessarily rely on the production of a card but instead could utilise access to the database administering the card. It was considered that this approach could result in significant efficiencies and an improved level of service to the customer. Significant emphasis would need to be placed on the design and deployment of the database.

On the issue of a unique personal number, it was suggested that there could be a numbering system being a random number generated by the supporting database, which could be replicated on the card itself. It was considered that the personal number would need to be displayed on the card itself, whilst another unique number, derived from and linked to the citizen's personal number, would be kept securely and secretly in the chip in the card and the central database to be used to facilitate on-line authentication.

On a national population register, while the entitlement card database could in time assume the role of a national population register, it was considered unrealistic to assume that this could be achieved in the short or medium term. However, it was considered that it should be possible for the design of the database to anticipate some of these longer-term requirements.

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

On delivery of Government services, it was considered that more effective and efficient delivery would take time to achieve. It was thought that the card should be promoted as an identification tool initially, which also delivers a benefit to the holder by providing a secure and reliable method of proving who they are. This would help to reduce bureaucracy in checking addresses and signatures.

In order for a card scheme to be a cost effective additional measure against identity fraud, it was considered to be critically important that the correct architecture is implemented to allow security schemes to evolve on the card to combat increasing levels of risk. This in turn relies on the quality of the data available.

On administrative burdens on employers and the effectiveness of a scheme in combating illegal immigration/working, Intellect pointed to views from member companies in Canada, which reports that the Canadian Government anticipate that the Permanent Resident Card programme will produce savings of CDN \$20 million pa from a modest reduction in undocumented arrivals.

Improved security and the ability to give additional securities to other countries regarding the identity of travellers were highlighted as advantages in using the card as a convenient travel document.

COMBATING IDENTITY FRAUD (CONSULTATION POINTS 18-22)

Strengthened checks on passports and driving licences were generally regarded by Intellect and member companies as being necessary regardless of whether a card scheme is introduced, in order to counter new forms of identity fraud.

On allowing access to the database by other Government departments and the private sector, it was thought that this would offer many advantages to the Government in ensuring that key transactions were co-ordinated and that there were consistent levels of anti-fraud checking taking place. Any common identity database used in this process could become

the hub system for wider checks across Government. It was suggested that there would be no reason why this concept could not be extended outside Government to private sector organisations, provided that adequate safeguards were in place to ensure that the subject's informed consent had been obtained.

On whether the Government should procure a service from the private sector to check applications for services against a number of databases, this option would need to be defined more clearly before being considered as a number of points are unclear in the consultation paper, for example it was considered unclear what "selected biographical data held by Government departments" would mean in practice.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

On whether to have a family of cards, it was the view that this was the most effective approach, with each being built upon the same security and authentication standards and the same technology platform. It would also offer guaranteed public uptake.

On the inclusion of biometrics, it was considered that the capturing and storing of this information would offer many advantages in terms of identity verification and security. However, there were a number of issues to be considered such as the fact that the technology in this area is still emerging; the scale would have to allow for national coverage; and the associated costs could make the project unsustainable. Also, some types of biometric may be less acceptable to the public than others and this reaction could have a significant effect upon the success of the scheme. It was also important to recognise that "false positives and false negatives" can still occur.

On the benefits of using the entitlement card as a smartcard, it was considered that this would help the card scheme gain the convenience, transparency, control and security offered by this type of card. Challenges would lie in creating effective management systems and commercial agreements. The benefits of other technologies such as Optical Memory and Digital Cards were also mentioned.

On the inclusion of digital certificates, this was considered to be feasible and the approach adopted by other countries, including Italy, was mentioned.

With regard to the level of information to be held on the register and on the card itself, this would depend on the design of the database and the precise characteristics of the selected card scheme model. However, the storing of minimal core personal information on the

central register seemed pragmatic. This would provide potential for privacy safeguards on the use and the sharing of personal data and would reduce the scale and the risk of the project to implement the scheme. Similar considerations would apply to the details to appear on the actual card.

DATA PROTECTION AND PRIVACY ISSUES (CONSULTATION POINT 35)

No further, additional comments were put forward by Intellect.

8 LOCAL GOVERNMENT

Distribution and contact

Copies of the consultation paper were sent to every local authority in England and Wales as well as all 32 councils in Scotland. Approximately 45 separate responses have been received from local councils, with a large proportion from Scotland.

COSLA, the Convention of Scottish Local Authorities, gathered and sent in 4 responses from Scottish councils, whilst others from Scotland arrived under separate cover.

Additionally, copies were sent to the Local Government Association which established a Task Group of elected members to organise meetings with various relevant organisations in order to reach an informed opinion and to prepare the LGA's written response.

During the consultation period, officials attended a preliminary meeting prior to giving a presentation to the LGA Taskforce, and contact was maintained thereafter. Presentations were also given to the Welsh Local Authorities Forum; Local Authority Fraud Investigators; and Local Authority Policy Officers.

Local Government Association

The collective view of the LGA is that it does not think that a strong enough case has been made for the introduction of a multi-application universal entitlement card.

It considers that the emphasis on entitlement rather than identity blurs the issues of identity of individuals and entitlement to services.

It would support, with sufficient safeguards, the proposal to set up a central population register with a unique personal identifier.

“... the consultation paper ... does not separate out the establishment of a population register and unique identifier from ... means of access to services using a card. They are clearly related but a register and personal number could be established without a smartcard scheme.

We think that there would be advantages to local authorities in a well-managed unique citizen reference scheme and the LGA would support this in principle”.

Local Government Association

The LGA's comments on consultation points are incorporated in the summary below.

Summary of Views of Local Government

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

30 of the 44 responses analysed were generally in favour of the principle of establishing some form of card scheme, with 8 against.

On targeting, one council commented that it would be easier to gain acceptance for a card if it were targeted for specific groups of individuals receiving a particular service and who can therefore see a direct benefit for having a card. Another commented that an incremental approach to be adopted over a number of years would enable a scheme to be monitored and adapted – but that may be disproportionate to that dependent on public services. For similar reasons, some councils commented that it would be better to introduce a voluntary scheme first, which could be developed into a universal scheme over time.

Of those in support, a proportion favoured a voluntary scheme and some gave support only for a voluntary scheme, mainly on the grounds of citizens' rights. One reason for favouring a voluntary scheme was that the public would feel more comfortable with cards which are issued for services they wish to access. Others considered that a voluntary scheme would only be successful if the public perceived and attributed tangible benefit to having one.

Opposition to a voluntary scheme was due to increased risk of fraud and unacceptable administrative costs in running parallel systems.

Of the councils in favour of a card scheme, most wanted a universal one and considered that this would help combat illegal working and minimise administrative burdens on employers. Benefits of a universal scheme were seen as being a means of speeding up administrative processes; helping with documentation processing for employers; making it easier to track movements; establish identity and proof of age. Accessing local authority schemes and screening employees were also cited as reasons to support a universal scheme.

Of those opposed to a scheme, the most common reason for not wanting a universal system was that it could lead to a compulsory one over time. Other concerns were on the use of the data on the central register; the costs of installing card readers; cost of enforcing a universal scheme; administrative ability to read the cards; the Government's ability to run the scheme.

There has been some misunderstanding of the term universal and some councils have only considered the issue of voluntary versus compulsory, stating that a compulsory scheme was the only option they supported.

On legislation, some thought that successive governments may decide to be more “robust” on crime and use the identity card process to enforce newer and tougher legislation. This could lead to the police being able to stop and check anyone and demand sight of the identity card. Potential problems with penalties were then highlighted, with scenarios of people being detained in police stations until proof of identity could be established. Any sanctions imposed may result in additional resources being directed to the police and judiciary system.

A suggested incentive was to link an entitlement card to local smartcard schemes which work on a discount basis with shops. There was some concern about denial of services if a card was lost or stolen, whilst other councils raised this as a way of sanctioning to ensure universal coverage.

There was general support for a unique personal number, although problems with people remembering it were highlighted, especially among those with mental health problems. Views include the allocation of the unique number by the Registrar General at birth.

Some councils raised the possibility of the National Insurance number (NINO) being used as the unique number, whilst other councils said that it would be unwise to rely on the NINO.

A national population register was seen as a very useful way of making links and co-ordinating between databases and providing for more efficient service delivery. Some commented that a central register with a unique numbering system would be able to perform the functions needed and this would negate the need for a universal card. The purpose of the register needed clarifying and there were some concerns on data protection issues if it were to be linked to commercial credit reference agencies.

Joined up systems were vital, according to one council, who stated that a citizen referencing database was the crucial issue, allowing for multiple access channels. A card scheme could follow on from that in the future.

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

Of those supporting a scheme, many thought that it would improve delivery of services. It would help with the administrative process in not having to keep repeating the same

procedures to establish entitlements to benefits and services. For example, lots of official time is spent checking and photocopying documents. It should also help prevent fraudulent claims for housing and council tax. However, one council mentioned that there are already in-depth security procedures in place.

Other possibilities for linked services mentioned were verifying homelessness; housing; housing benefit; council tax collection; customer services for joined up service delivery; and Registrars for reducing potential for fraudulent use of birth certificates and improved detection of bogus marriages.

However, other councils as well as the LGA felt that they could not comment on how local authority services might link to a scheme because it is not clear what that might involve or what other administrative and I/T systems would have to be in place.

I/T costs in implementing an entitlement card scheme could be “enormous”. Lack of confidence in the ability of Government to run a scheme of this size was also expressed. It was generally thought that the costs of a scheme would be worthwhile to ensure prevention of identity fraud and better security.

Pre-employment checks should be made easier, and most councils could see benefits to employers in tackling illegal working. The current verification procedures in checking identity documents can be time consuming and the range of documents confusing. However, some councils expressed concern that the entitlement card could be forged and stolen cards could be used.

Some considered that the evidence for the introduction of a card scheme to reduce illegal working was dubious. A card would have to be issued very promptly to be effective and unscrupulous employers could still continue to collude with illegal workers. Suggested alternative measures were to increase substantially the penalties for employers and to provide more clarity for employers on their duties.

Most agreed that it would be a useful proof of age. The price of cards for young people was raised as a possible concern, as costs could make the card lose its appeal. Connexions cards and local government smartcard initiatives were referred to as current proof of age initiatives for young people.

Very few of the councils commented on consultation point 15 on reducing crimes and uses of a card in serious crime investigations, but the usefulness of exchanging information between various Government agencies in fighting fraud was highlighted.

Electronic voting and registering voters could be improved under a card scheme, according to many councils. One expressed the view that this is a very powerful proposition which has been insufficiently covered in the consultation. Confirming identity for Internet transactions was also seen as a benefit.

The inclusion of medical information was also seen positively, but one commented that this was a personal rather than corporate issue.

COMBATING IDENTITY FRAUD (CONSULTATION POINTS 18-22)

It was generally agreed that an entitlement card to replace the current “myriad” of documents used to prove identity would only reduce fraud if the processes to obtain the card were much more secure than the current systems, which are open to abuse. Passports and driving licences are currently used as part of the local council Verification Framework so there was general consensus that issuing checks for these documents should be strengthened. Some local authorities expressed the view that they would require access to the database in order for the scheme to be of benefit.

The main reason for local councils undertaking identity checks is in relation to benefit claims. Views were expressed that the use of an outside body such as a credit reference agency may slow down the verification process and result in delays and claims of hardship. Other comments were based on doubts regarding the accuracy of private sector databases, data protection and privacy issues.

A summary – only offence of identity fraud was supported in that it would assist in discouraging fraudulent claims. However, safeguards should exist for vulnerable groups.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

Passport/driving licence entitlement cards were generally welcomed. However, some raised the issue of possible confusion which may result from a multiplicity of cards and a suggestion is that the card should either be a passport card or a driving licence card, not both. The reasons for not combining these cards were understood, but ways around it could be sought in the longer term. Issues on what would happen if a driving ban is imposed, a person becomes medically unfit to drive or passports confiscated in trial or bail situations were also raised.

Most agreed that young people should apply at 16 on being issued a NINO. Issuing at this stage could help to ensure increasingly wider take-up of the scheme. One council suggested a lower age to cover a wider range of services.

Current “citizen card” initiatives were highlighted by several councils, for example, the Edinburgh Young Scot which will be offered to people aged 12-18 in the first instance. It will be linked to a citizen’s account and used to improve local service delivery.

“... young people in Edinburgh are supportive of a citizen’s card. It offers a potential link to a range of positive services ... However, an entitlement card scheme operated by the Government is a different proposition and no detailed consultation has taken place with young people in Edinburgh.”

The City of Edinburgh Council

Councils did not provide much substantive comment on the issuing of cards to foreign nationals (consultation point 26). However, one comment was that care would have to be taken to engage with BME communities already based in the UK and non-British passport holders would have to be reassured on any concerns regarding possible reductions in their entitlement to services.

The need for biographical checks was supported in principle as increased security and thoroughness in the issuing process was recognised as being essential.

The use of biometrics evoked varied comments. It was widely accepted that this would provide the best proof of identity. However, costs had to be considered in ensuring that relevant organisations had sufficient equipment and training to ensure cards could be read properly. Availability and accessibility of locations were also an issue. This was considered to be potentially very expensive.

Some concern was expressed on what the public reaction would be to the concept of biometrics. Other comments were on the expense of setting up systems subject to change and rapid advancement. Systems could also be error-prone and unreliable initially. Given adequate funding, councils commented that local authorities would be appropriate places for applications and biometric recording.

Problems in the recording of particular types of biometric were mentioned, and it could need to be regularly updated as a result of changes through injury, illness or ageing. One council stated that there was no mention of potential health implications of repeated use of biometric information to verify identity.

A smartcard chip in an entitlement card would allow for access to multiple services and was widely considered to be beneficial. Local authority smartcard pilot schemes were mentioned. However, as it is a new and rapidly developing technology within the public sector, there were

comments that expertise and experience would be limited and dispersed. More information on card reader infrastructure would be required. If a card were to provide multi-function access to services and proof of identity, there might be considerable costs associated with the provision of card readers to public and other relevant authorities.

Current experience gained from local authority smartcards were with single application cards providing access to transport, school meals, leisure centres and are stand-alone. Multi-application cards are still in the early stages and there may not be a wealth of operational experience.

Other councils were keen to link local authority smartcards with an entitlement card.

“The advent of the entitlement card scheme on a universal basis would provide the council with a link into a scheme with total coverage of the population. (It) could then supersede any smartcard scheme already set up... quick and easy way of accessing a range of local government services with a single card, rather than having to carry a range of separate cards.”

Birmingham City Council

However, it was mentioned that the costs of an entitlement card could be a disincentive as some local authority card applications are intended to be free of charge.

An electronic system for validating transactions was seen as being beneficial. On-line access to core data on the central record was considered by many councils to be a better option than the possible impracticalities of having biometric readers at every customer service point. In cases where identity was unclear, it was suggested that one reader per site could be installed. For on-line transactions, a UK standard keyboard incorporating a card reader was suggested by one council. If on-line verification of personal data in the entitlement card was introduced, levels of customer satisfaction and available services would increase.

Digital certification and authentication were areas where at least one council considered were insufficiently covered in the consultation paper.

There were comments as to whether the unique number should be shown on the card itself, as this could cause problems if the card were lost or stolen. The general view was that the minimum information should be required on the card. One suggestion was that additional information could be added at the discretion of the cardholder.

Local authorities are becoming increasingly diverse in the groups of people living in different areas. There would be the risk of tension if stop and search figures among minority ethnic groups increase as a result of a card scheme being introduced. It would be vital for any card scheme to take account of the difficulties of homeless people and those with mental illnesses and overcome their reluctance to apply for a card.

The use of partnership networks was suggested in reaching these groups, such as GPs, medical centres, voluntary and community organisations.

It was generally felt that further information would be needed on the expected costs for which local authorities would be liable before making assessments of employers' compliance costs. However, views were expressed that there could be significant costs involved in setting up IT, with the risks of delay and overrun impacting on cost estimates.

Sufficient resources would need to be provided to local authorities to move forward with a card scheme in an efficient and effective way.

DATA PROTECTION AND PRIVACY ISSUES (CONSULTATION POINT 35)

Human Rights and Data Protection issues were frequently mentioned, highlighting the need for care in implementing any scheme in order to ensure compliance. Freedom of Information and the UN Convention on the Rights of the Child was also mentioned. Local authorities have commented that they would need to be provided with guidance on the implications under this legislation. Specific data sharing protocols should be included in secondary legislation.

9 OLDER PEOPLE

Distribution and contact

Copies were sent to three organisations representing older people. This generated responses from some of their member organisations – the Civil Service Pensioners Alliance (CSPA) Essex branch, North-West London group, West Sussex branch, Bognor Regis branch and Norfolk & Suffolk branches, Kingsbridge Age Concern, Pensioner’s Voice and the National Federation of Post Office and BT Pensioners. A number of members of the public also responded in this capacity.

During the consultation exercise, officials attended meetings held by the MoD Veterans Group.

Summary of Views of these Stakeholders

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

Views were mixed. None specifically mentioned issues particularly relevant to older people though some mentioned that older people may have difficulty proving identity at present due to the fact that they may not have driving licences and passports.

Pensioners’ Voice felt the name entitlement card implies it is directed at reducing benefit fraud and therefore will ‘apply in the main to the less affluent and more disadvantaged.’ They also did not think the Government could cope with an IT project of this size. They would be particularly worried if the card were a smartcard as ‘it is these that are likely to give rise to most dangers.’

“The proposals are an expensive way of introducing doubtful advantages and probable inconveniences and abuses.”

“There would be inevitable errors which could have serious consequences and loss could result in refusal of benefits or even jobs.”

Pensioners’ Voice

Some views were supportive of a universal entitlement card scheme issued at birth. Other comments favoured a ‘compulsory identity card.’

CSPA (Essex) stated that many of their members have had problems proving identity to 'various public and financial institutions' but felt the proposed scheme is a 'half hearted approach which would do little to reduce fraud but would create an expensive bureaucracy'.

Other groups in support of a scheme commented that identity cards should provide some protection against fraud and mitigate against an increase in crime. It was not thought that the card would be inconvenient as most people already carry a driving licence, many with the owner's photograph. It was also mentioned that security at airports now means that passports are carried for identity purposes even for domestic flights.

One group who were supportive of a scheme stated the case of a man who was refused a bank account due to the fact he could not produce a passport or a driving licence, which he did not hold due to a disability. He could, however, produce his old identity card issued during the war and another bank were prepared to open an account for him with this.

Correspondence from the general public echoed this view, though some said they should be voluntary for those who do not have a form of identity.

"I would welcome an identity/entitlement card in any form. I am older and have never had a passport nor held a driving licence. However, banks, post offices, building societies and many other organisations have a habit of asking for either passport and/or driving licence as proof of identity, and when they hear that you can't provide either, it causes problems."

Name supplied, via email

However, other comments received indicated there was no need for an entitlement card. Some people stated that they did not hold a passport or a driving licence, but found that 'alternative methods of identification are always allowed.'

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

CSPA (Bognor Regis) felt the card would reduce crime and illegal immigration and 'it could... have a number of valuable uses to the possessor of the document.' They also thought it would reduce fraudulent use of NHS.

Other groups stated they would be concerned about charging for the card and thought it should be funded from general taxation.

COMBATING IDENTITY FRAUD (CONSULTATION POINTS 18-22)

CSPA Norfolk and Suffolk felt 'there should be a radical improvement of the current DVLA and UKPS systems'.

Another comment was that biographical checking would be 'a step too far.' (CSPA Essex)

It was not thought that the private sector should be able to access this information. Other Government departments should have 'limited access.'

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

One view was that the UKPS and DVLA should have a common database regardless of the introduction of entitlement cards. Many responses mentioned the fact that the security of passports and driving licences should be improved regardless of any scheme.

Many groups agreed with the use of fingerprints and iris scans, with some views that this would be essential.

10 POLICE ORGANISATIONS

Distribution and contact

Copies were sent to the 8 main police associations and federations in England and Wales, Scotland and in Northern Ireland, with enough copies to cover every force. Responses were received from the Association of Chief Police Officers (ACPO) and the Police Federation representing forces in England and Wales, ACPO(S), the Association of Scottish Police Superintendents and the Scottish Police Federation representing forces in Scotland and the Superintendents Association of Northern Ireland and the Police Federation for Northern Ireland. All these organisations have submitted the majority view of members, whilst reflecting a full range of views expressed.

During the consultation period, officials prepared a summary consultation leaflet specifically covering issues for the police to consider. Officials also attended two ACPO seminars.

Association of Chief Police Officers (ACPO)

ACPO was of the view that there are clear attractions for an entitlement card system which carries a high level of accuracy in relating the card to the bearer. It also saw clear benefits to public and private sector organisations in combating identity fraud crimes. It commented that it would want no part in the issuing or administration processes associated with a card scheme as it is working hard to reduce bureaucracy and would want to avoid any additional administrative burdens – and is therefore pleased that this played no part in the consultation.

The Police Federation of England and Wales

It confirmed that it has campaigned for at least nine years for a compulsory identity card to be introduced, with associated benefits identified as enabling a speedy means of street identification; assisting in prevention of fraud; reduce cases of bogus callers; and be a valuable proof of age for pubs, clubs and other age-restricted areas. It also comments on security aspects, post September 11.

However, it goes on to state:

*“... whilst we maintain our original policy for compulsory issue, we do concede.
... that a voluntary issue for the majority of citizens may well placate the libertarian
objections as the public become more aware of the benefits. We doubt the criminal
element will ever change their opposition!”*

Police Federation of England and Wales

The comments from the above organisations on consultation points are incorporated in the summary of all Police Organisation views expressed below. Many organisations have restricted comments to the consultation points covering areas of significant interest to the police service.

Summary of Views of these Stakeholders

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

All responses analysed are generally in favour of the principle of establishing some form of card scheme. As comments also show above, there is strong support for a compulsory to carry and produce card, although benefits can also be seen in a universal card.

*“We would advocate a compulsory scheme were it not for the certainty that it would
be widely opposed by both those with genuine and deeply held objections on privacy
grounds and by others for whom it would become the latest excuse for demonstration
and civil disobedience.”*

Scottish Police Federation

There were strongly held views that the absence of a compulsory element is a major area of weakness from a police perspective. The effectiveness of a scheme, where there is no provision for individuals to carry or produce a card upon request to an appropriate authority, would be hampered.

On a voluntary scheme, views were expressed that the uptake of such a scheme would be insufficient to be of any operational value to the police service.

On legislation, there were views that the integration of implementation with normal renewals of driving licences and passports would take considerable time, whereas it would be desirable to have a scheme implemented as soon as possible. An end date for existing documents was suggested, after which it would be necessary to change to the universal scheme documentation.

The creation of criminal offences of making fraudulent applications and use of cards and of counterfeiting cards would ensure that the scheme was as effective as possible. It was also considered that there should be penalties for failure to notify significant changes to personal details. Secondary legislation should be used to introduce changes to the scheme quickly, in the event of it being compromised by counterfeiters.

The power to require a person to provide their identity was seen as being paramount to the future of a scheme. This would hopefully make the usage of section 25 of the Police and Criminal Evidence Act 1984 redundant, except in very few cases.

On sanctions to help ensure universal coverage, the need for care over public feelings was emphasised.

There was support for the allocation of a unique personal number. This would be the best way to ensure cross-referencing of the three different types of card. The existence of the National Insurance number should make migration to any new system easier. Foreign nationals could be issued with a unique set of numbers in these circumstances. It was considered that the number should be displayed on the card.

Comparisons between a national population register and the existing National Census were drawn, questioning whether this could be used instead. It was commented on that it would be difficult to achieve a factually correct and current population register and in this light it would provide little benefit in identity verification for police purposes, over and above those already used.

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

On delivering public services more efficiently, it was thought that a card scheme would provide an opportunity to maintain accurate records of service provisions to cardholders. Although it was considered that a scheme might allow for more efficient administration of public services, it was not considered that any efficiency benefits would be brought to policing functions.

Regarding a card scheme being a cost-effective measure against identity fraud and money laundering, electronic recognition of individuals in these, and other related activities such as credit card fraud, would be of immense use. A card scheme would be another tier of identification for a criminal to get through. It was considered probable that the most determined offenders would still find ways to circumvent a scheme, but the vast majority would be likely to find a robust scheme a powerful disincentive, and it would therefore reduce the costs to society of this type of crime (but see comments below on effectiveness of a scheme in combating identity fraud).

On the effectiveness of a card scheme to combat illegal working and illegal immigration, comments were made that it would be of limited benefit, although if access to Government entitlements were removed without the card, and deportation was the expectation for all those found without one, then some of the incentives for illegal entry would be removed. Effective monitoring and penalties for breach of regulations would be required as disincentives for organisations and individuals that are prepared to use and exploit illegal workers.

On proof of age usages, it was considered that an entitlement card would assist shop owners and licensees control the sale of age-related products.

On the effectiveness of a card scheme in reducing other forms of crime, it was thought there would be limited effect, in the absence of any measures to compel people to produce their card to police on demand. Voluntary production would only assist in verification of certain aspects of the identification process. Speeding up of the identification process may result, but it was generally felt that that it was difficult to envisage a significant reduction in police administration times. However, another view was that, if card usage became widespread, there could be benefits for police administration. Swiping cards rather than recording personal details of those attending police stations for various purposes would save time. Other savings could be made if people could produce the card to be read on the street and that information could then be transferred to police systems during police operations such as stop checks.

Access by the police to the central register for investigations of serious crimes, subject to a warrant system to provide necessary safeguards, was strongly supported, with full acceptance that interrogation of such a system must be justified.

With regard to the inclusion of emergency medical information, the provision of a smart card reader and an identity card would help a police officer first at the scene to access pertinent emergency information and pass it on to the appropriate agency.

COMBATING IDENTITY FRAUD (CONSULTATION POINTS 18-22)

It was considered that there was a very strong case for strengthening checks on passport and driving licence applications, with further reliance on biographical data, and possibly the inclusion of further biometric information, over and above the digital photographic image.

Notwithstanding comments above on the cost effectiveness of a scheme in fighting identity fraud, concern was still expressed that if the cards are to be the “gold standard” of identification, the efforts needed to create fraudulent cards or false identities would become a worthwhile enterprise for criminals.

“Whatever scheme is introduced, a criminal will try to find a way around, or through, it. Therefore there will have to be a system of constant monitoring and review to adapt and change procedures where necessary.”

ACPO

A summary – only offence of identity fraud was supported. The very act of using a false identity should be a criminal offence, without the need to prove any criminal intent. The seriousness of the circumstances should determine whether the offence should be prosecuted under summary or solemn procedure but it was considered that normally a summary prosecution would suffice. However, to restrict an offence to summary only was considered to be too narrow.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

It was considered that many of the consultation points in this section were outside the remit of the Police Service. However, comments were still put forward. There was general support for a card scheme based on the driving licence and passport cards, with the third, stand-alone version, although the necessity of speed in applying and issuing them was mentioned. It was suggested that one card being able to act as a driving licence and/or passport would be sensible, but it was realised that this vision would take many years to achieve.

It was pointed out that the photograph on the card should be as large as possible as those on the current driving licence cards are extremely limited for use in matching with the identity of the bearer, and physical appearance can easily be changed/disguised.

On issuing a card to various categories of foreign nationals, comparison with European partners should be made and the view was that Human Rights would not be compromised under the envisaged system.

More background and biographical checks for issuing entitlement cards was supported as it could only prove beneficial – with the proviso that any systems in place can be replicated by those involved in serious and organised crime.

There was wide support for the inclusion of biometric information on a card. It was pointed out that iris imaging has yet to be used on a large scale and facial recognition technology also required further development. Current fingerprint technology already exists and could accommodate a national database. Obtaining and comparing fingerprints can already be achieved with an acceptable high level of accuracy and is only moderately time consuming and labour intensive.

However, it was thought that the public may be wary of providing fingerprint details as this was associated with criminality. Whilst there was potential for some resistance to the provision of iris imaging, it was considered that this could be overcome rapidly.

There was interest in the outcome of the biometric feasibility study into how biometric information could be stored on a card. The inclusion of biometric information was considered to greatly increase the worth of the card in combating identity theft. It was considered that this inclusion would be the most economic option in the long term. There was a view that DNA testing could also be used.

It was commented that the police already have robust powers of identification. A positive benefit to the police of a card scheme would be the ability to verify identification on the street by means of biometrics verification. This would mean that mobile technology would have to be provided to patrolling police officers, as well as any necessary changes in legislation. Although this would result in considerable benefits for crime reduction and community safety, civil rights issues would have to be protected, with the public being reassured of this.

With regard to what information should be held in the central register and what should be displayed or stored on the card itself, there were comments that if a large amount of information was stored on the card itself, the bearer would be more vulnerable in the event of loss or theft. Also, it would be undesirable for information that is likely to change frequently to be stored on the card, with the associated administrative costs this would incur. Address details were therefore better left off the visible card information.

ACPO commented that what should appear as a minimum on the card were name, date and place of birth, address (but see above comments), colour photo, unique number/NI number, signature, visible anti-fraud device, issue number and biometrics. The database should hold previous addresses, all relevant ID numbers to allow cross-referencing with other agencies, marker to indicate issue number, reports of theft/loss and biometric information.

DATA PROTECTION AND PRIVACY ISSUES (CONSULTATION POINT 35)

There were few substantive comments from these organisations on this issue. However, it was raised that there was concern regarding the impact of the scheme on people who require new identities – such as undercover officers, special forces, and people on witness protection programmes. As original identities would be stored on the central database, security breaches could place these people at risk. Robust safeguards would be needed to ensure protection of people falling within this category.

11 RACE ORGANISATIONS AND REFUGEE ORGANISATIONS

Distribution and contact

Copies of the consultation paper were sent to 8 race organisations and 12 refugee organisations, as well as the Commission for Racial Equality (CRE).

During the consultation period, officials met once with the CRE; gave two presentations to the Confederation of Indian Organisations in Wembley and Leicester; and had meetings with the Refugee Council, the Law Society and the National Association of Citizens' Advice Bureaux (NACAB).

Commission for Racial Equality

The CRE drew attention to the requirement under the Race Relations Act 1976 to assess and consult on the likely impact on race equality of proposed policies and pointed out that it expects the Home Office to conduct an impact assessment of the proposals for an entitlement card scheme at the appropriate time.

It felt that it was not in a position to make a full assessment of the potential impact on race equality and community relations due to the general lack of clarity of the consultation paper. It recommended that the publication of a draft Bill would enable a full impact assessment to be conducted the results of which could be taken into account before any final decision was made.

It pointed to the situation in other countries with identity card schemes which have inadvertently led to the discrimination of ethnic minorities and advised that potential benefits of a scheme need to be weighed against potential dangers.

"... potential tensions between ethnic minorities and service providers, and the exclusion from services of those who have lost their card or have been unable to acquire one. ... For (these) reasons, we consider that the potentially negative impacts of an entitlement card for ethnic minorities may be greater if the scheme covers access to services than if it only governs access to employment. There are significant issues of trust and confidence which will need to be addressed before an entitlement card scheme receives support from ethnic minorities."

Commission for Racial Equality

The CRE's comments on consultation points are incorporated in the summary below.

Summary of Views of these Stakeholders

Four responses were received from refugee organisations – the Law Society; Immigration Advisory Service; the Joint Council for the Welfare of Immigrants and the Immigration Law Practitioners' Association. Four responses were also received from race organisations – the Confederation of Indian Organisations; SANGAM – Association of Asian Women; Sikhs in England and the Council for International Education and the CRE.

Of these, 3 were against any scheme, 3 were in support of some form of scheme and 2 were neutral at this stage.

Due to the specialist nature and specific concerns of these organisations, not all consultation points were covered by them, and where reference is made it has usually not been of detail. However, given the nature of their organisations, the Law Society and NACAB in particular have not confined responses solely to race or refugee issues and their wider input has also been taken into account. The particular areas of relevance for this group are on consultation points 1, 2, 3, 12, 26 and 34, but other comments made are also provided.

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

Of the two organisations in support, one stated that a scheme should be targeted at foreign and non-British citizens residing in the UK. There should be no change for British citizens to establish an individual identity as practised at present, although there should be the option to possess a card if desired. Some of those against stated that if a targeted card were introduced, it should be specialised for specific purposes and linked to users having greater difficulty in obtaining services. Generally, however, there was no support of or benefit seen in a targeted scheme.

Of those against, most saw no indication that a voluntary scheme would be effective. A voluntary scheme could lead to inconsistent coverage; would not preclude organisational burdens; is not proven in reducing identity fraud; would be costly and time-consuming; and would threaten civil liberties, human rights and data protection. One organisation did concede that of the schemes mentioned, a voluntary one was the only one which might prove acceptable. It may be desirable to new arrivals in the UK who wanted to demonstrate entitlements more easily in the light of being frequently asked to do so. However, there were still the dangers of perceived discrimination.

Most of the organisations which responded were firmly against a universal scheme. Dangers were predicted in any such scheme becoming compulsory if access to services relied on having a card. It was maintained that there are already mechanisms to achieve the main aims of a card scheme – in helping people gain access to services and in confirming identity. Civil liberties could also be threatened.

The organisation in support of a scheme wanted a universal one for the purposes of identity theft and fraud and in stopping illegal trafficking of people.

Of those who commented, it is generally accepted that the adoption of an entitlement card scheme through primary legislation would establish the card itself and the right to create the central register. However, one commented that the proposal may lead to a costly central register with no real use for the card.

It was commented on that there was no guarantee of universal coverage and sanctions were strongly opposed, especially as denial of services would impact most on the vulnerable members of society.

With regard to introducing a unique personal number, problems with current numbering schemes were pointed out and it was suggested that such problems should be remedied before introducing yet another numbering scheme.

Generally, the benefits of a national population register did not outweigh any problems, such as cost, complexity and the ability of Government to run one. However, it was conceded that such a system of notifying one source instead of several would be more convenient.

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

Although the aim of wanting to allow for more efficient and effective service delivery was welcomed and it was generally agreed that there were benefits in making current procedures more straightforward, it was not accepted that a card scheme was the best or only way of achieving this.

There was some wariness over links between public and private sector databases. Issues such as costs of IT and staff training were also raised.

The risk of the card itself becoming the target of fraud was highlighted. The costs of conducting in-depth biographical checks in order to secure the issuing process had to be considered in whether the card would be cost-effective.

It was the view that the staff involved in determining the entitlements of foreign nationals would need to be highly trained on the Immigration Rules to carry out the task properly.

The costs of installing card readers would need to be taken into account in assessing administrative burdens on employers. The measures set out in the Immigration and Asylum White Paper were considered to be effective without a card scheme.

Proposals for the introduction of a passport entitlement card to allow travel within Europe was seen positively, but it was pointed out that such a card need not be an entitlement card as well, and it would then be cheaper.

Establishing proof of age was generally seen as a benefit in a card scheme, but there were risks in underage people fraudulently using lost or stolen cards.

It was viewed that a card could have counter-effects in increasing crime, fraud and money laundering as criminal gangs worked on developing forgeries. Police access to information on a central database was generally unpopular.

Some value could be seen in using the card for new ways of voting, but this benefit did not outweigh the costs.

Current, voluntary mechanisms in place for recording emergency medical information were mentioned, together with the inconvenience of having to look for a card at the scene of an accident instead of, for example, looking for a bracelet or necklace. Also, as medical information could change rapidly, there could be risks if the information was out of date.

COMBATING IDENTITY FRAUD (CONSULTATION POINTS 18-22)

It was considered that other options would tackle identity fraud more effectively than the introduction of a card scheme, including the biographical checks being introduced by the Passport Office and DVLA and sharing best practice between the public and private sector.

Although the extended checks for issuing passports and driving licences were welcomed, the inclusion of biometrics was seen by one organisation as not being cost effective, given the requirement for scanning equipment and staff training.

Points 20 and 21 on accessing identity databases raised concerns about Data Protection and civil liberties. It was felt that the security of the information could not be guaranteed.

One group commented that there was not a sufficient case for changing the law to make a summary – only offence of identity fraud.

Another group commented that it wishes to see tough sentencing for those caught misusing cards, and even tougher sentencing for those involved in the production or supply of forged cards to aid identity fraud.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

It was commented on that the option of using current photocard driving licences and passport cards would be a lower-risk option.

There were no substantive comments on the use of the National Insurance number or on young people in the wider sense, although comment was made on the impact on young foreign students.

The main area of concern, particularly but not exclusively, for the refugee groups which responded to the consultation exercise, was how an entitlement card scheme would impact on foreign nationals. Other groups also felt strongly on this issue.

It was pointed out that a card scheme would not only make the UK a potentially less attractive destination for overseas workers, but also affect the recruitment of international students, whose economic presence is acknowledged and welcomed by the UK. It was further pointed out that the UK was in keen competition for these students with Australia and the USA.

“Foreign students and their dependants will already have a passport that allows their immigration status and employment status to be readily identified. It is not clear that there would be any advantage for such students in needing to apply for an entitlement card as well ... The need to pay for a card in addition to paying for a visa would also be a disincentive to some prospective students. This would be particularly so if (they) also had to pay for extensions to the life of the card”

UKCOSA – The Council for International Education

Any card system would have to be organised in such a way as to deal with the frequent changes in personal information and status of those subject to immigration control, otherwise holders could be unnecessarily disadvantaged. Access to services could be wrongly denied and people could be treated as if they were here illegally when that was not the case.

The complexity in immigration law was cited by most refugee organisations as making it difficult to determine a person's immigration status and linked entitlements at any one time, with the knock-on effect of problems in keeping an entitlement card scheme accurately updated.

Entitlements according to varying and exact immigration status were also extremely variable and difficult to determine, requiring specialist staff skills within immigration, health and benefits areas.

The pull factor for illegal immigrants to target the UK was not considered to be based on verifiable research or evidence. Comment was made that although the consultation paper refers to the "impression" that illegal immigrants come to the UK due to the ease of accessing employment and services, the real pull factors are knowledge of the English language and colonial links; presence of relatives/friends; and the UK being a safe, just and tolerant society. It was pointed out that these reasons were also cited in a Home Office RDS publication in July 2002.

One group which supported a voluntary only scheme stated that an entitlement card could be seen as part of the toughening up measures to reduce the pull factor, following on from the withdrawal of the work concession for asylum seekers and the introduction of in their view stringent legislation to restrict their access to benefits.

However, the group went on to say that none of these measures was likely to stop asylum seekers or others from coming to the UK as the overriding reasons for coming would still exist i.e. complex social, cultural and family reasons.

"... considers that the consequences of this toughening up of policy towards asylum seekers is that people will be left destitute and in circumstances that clearly breach the UK's obligations under the European Convention on Human Rights."

Immigration Law Practitioners' Association (ILPA)

The complicity of unscrupulous employers in people trafficking was mentioned as a block on the potential benefits of a card to combat illegal working.

One view expressed was that companies or organisations that employ illegal workers should be named and shamed in addition to being dealt with severely under Section 8 of the Asylum and Immigration Act 1996.

The establishment of identity for the purposes of the issue of the ARC cards was often based on very little or no evidence. It was considered that there was a high risk of dishonesty in obtaining ARC cards and if the entitlement card was to be issued on trading in the ARC, this may open the door for further identity fraud.

Delays in the issuing system was also raised as a potential problem. An example given was that some students here for relatively short periods of less than 6 months do still have restricted employment rights which they take up. Delays of only a few weeks in issuing an entitlement card could seriously impact on their ability to benefit from this right.

It was widely considered that in reality employers are likely to be very cautious at best, and more likely to refuse, to employ anyone without a card at the outset, even if there was a period of grace allowing them to do so.

No substantial comments were made on biographical checks, other than to highlight that current records are frequently out of date.

There was some unease about providing biometric information, and it was pointed out that not all individuals have the features required to provide it. Other comments were on the expense of reading equipment and the unnecessary burden on those who would find it difficult to participate in a scheme.

On what should be visible on the actual card, the following comment was made:

“... SIE believes that it is an excellent opportunity to reinforce the drive for separate monitoring. Sikhs say ethnic origin if not religious affiliation of the individual should be part of the “Visible Data” if Sikhs are shown separately...

Sikhs believe if not insist on a full-face image – not retina or other encrypted identification type. This will ensure that the turban is a visible feature and associated with Sikhs.”

Sikhs In England

Although different groups of people who would find it difficult to participate were identified, with the risk of adding a further layer of discrimination against them, nothing substantive was out forward for tackling these problems.

The potential threat to civil liberties and data protection issues were mentioned with regard to the sharing of information between organisations.

On compliance costs for employers, it was considered that current plans to reduce the amount of documents listed under Section 8 of the Asylum and Immigration act 1996 would be more efficient in reducing these costs than the introduction of an entitlement card scheme.

DATA PROTECTION AND PRIVACY ISSUES (CONSULTATION POINT 35)

It was felt that a large amount of information on foreign nationals would need to be held on the entitlement card/central register in order for it to be sufficient in detailing the complexities of immigration status. The holding of such large amounts of information would raise serious issues of confidentiality, especially if government agencies and private sector firms were able to access it. There were concerns that the cardholder would be unable to tell whether the information was accurate.

Access to information by private sector organisations was generally seen as a concern.

12 RETAILERS AND PROOF OF AGE GROUPS

Distribution and contact

Copies of the consultation document were sent to 16 retailer organisations as well as organisations with an interest in proof of age. Responses were received from 7 – Direct Marketing Association (DMA), the National Consumer Council, the National Parliamentary Committee of Licensed Victuallers Associations (NPCLVA), the National Federation of Retail Newsagents (NFRN), the Tobacco Manufacturers Association, CitizenCard and Validate UK.

The National Consumer Council

The National Consumer Council felt that the consultation raised important issues for consumers. However, they were currently in the process of developing their policy in this area and so were unable to comment on the issues raised in/by the document.

Summary of Views of these Stakeholders

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

The vast majority of the responses received were in favour of some form of scheme. The favoured option for an entitlement card is a universal or compulsory card where the holder is encouraged to carry the card at all times.

Another view was that:

“the entitlement card should be compulsory so that everyone in the country over a certain age would be required to register with the scheme and obtain a card. There would not be a legal obligation to carry a card but there could be a legal obligation to produce it within a certain time at the request of a police officer or other authorised person.”

The NPCLVA

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

Most of the Proof of Age stakeholders commented solely on point 14 of the consultation document. The general feeling from these groups was that an entitlement card would provide a government issued universal means of enabling retailers to establish proof of age

at the point of sale. Retailers feel that a recognised, government-backed ID card carrying date of birth and a photograph will solve the problem of deciphering what constitutes adequate ID.

CitizenCard, the National Federation of Retail Newsagents and Validate UK felt that in order to provide comprehensive proof of age, cards would need to be issued to under 16s. CitizenCard suggested they be issued to all secondary school pupils, Validate UK suggested they be issued to anyone aged 12 and over.

Validate UK felt that in order to be truly useful as a proof of age card, age boxes should be printed on the card e.g. 12, 15, 16, 18.

CitizenCard felt that cards should not be 'grafted on to any existing Government Department or Agency.' The NFRN felt that the entitlement card scheme should be administered by a government-controlled agency or should fall under the wider scope of the DVLA or Passport office.

Responses from CitizenCard, NFRN and Validate UK all emphasised that proof of age should not require the use of a reader.

COMBATING IDENTITY FRAUD – (CONSULTATION POINTS 18-22)

The DMA believed that entitlement cards could be a useful way of reducing identity fraud and money laundering. Care would need to be taken in the issue of cards to ensure that there are not more cards in circulation than there are people entitled to them. Entitlement cards would provide a useful additional method for verifying a purchaser's identity provided it could be used even if the cardholder was not present. This would be particularly useful to them as an organisation that uses distance-selling methods.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

CitizenCard felt that cards could be delivered much quicker than outlined in the consultation paper.

No other substantive comments were received on these points.

DATA PROTECTION AND PRIVACY ISSUES (CONSULTATION POINT 35)

The DMA commented that the issues raised in the consultation process on Privacy and Data Sharing need to be addressed before the Government moves forward with the planned entitlement card programme.

“However, good the security systems were which were built into such a multi-application card, there would always be the risk that such security could be breached.”

DMA

CitizenCard felt that a card scheme should be as low-tech as would be compatible with a secure and forge-proof scheme.

CitizenCard also felt that access to the database should be permission-based, therefore if a third party wanted to corroborate data it held, it would need to obtain the cardholder’s consent.

13 RURAL ORGANISATIONS

Distribution and contact

Copies were sent to 3 organisations and a response was received from the Countryside Agency (CA). During the consultation officials had a meeting with this group.

Summary of Views of these Stakeholders

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

The CA had no view on the principle of entitlement cards and focused instead on 4 areas relevant to them: seasonal workers, access to services, cost and biometrics.

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

It was important for the agricultural sector that entitlement cards did not dissuade those thinking of joining the Seasonal Agricultural Workers Scheme (SAWS), which relies on overseas workers and students. It was thought it could be useful if the two schemes could be joined up so that a temporary work permit could be issued with an entitlement card and therefore reduce paperwork.

Poor access to services was a 'key facet of social exclusion for some in the countryside.' CA would like to see an entitlement card helping access to services 'particularly if it resulted in more services (public and private) being accessible locally and provided through an outlet, like the village post office.' CA also mentioned that the ability to access services on-line or via digital TV with a card would be useful.

CA felt that access to services was a particular problem for older people who are in need of care and explained that this age group are over-represented in the rural population. They would like to know if a carer would be able to access services on a patient's behalf.

"The Agency would be concerned if some of those who would benefit most from a card (to access benefits and services) were having to pay a charge or put off having a card to save money."

The Countryside Agency

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

The CA thought it would be important to consider having biometric recording equipment in every market town and being flexible about the host organisation and the possibility of machines in mobile units.

14 GROUPS REPRESENTING TRANSGENDERED PEOPLE

Distribution and contact

Although transgendered people were not highlighted as one of our stakeholder groups, two responses from organisations representing them – the Beaumont Trust (BT) and the Beaumont Society (BS) have been received.

Summary of Views of these Stakeholders

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

Both BT and BS were neutral on the scheme though the BS would be in favour if the scheme would provide a significant social benefit. The concern of both groups was that a universal scheme might have a negative effect on the transgendered community.

BS felt there were already documents to prove identity and unless an entitlement card would give a significantly great surety then there was little point proceeding. They felt a voluntary scheme would be of little value. They agreed that a unique personal number could be useful but would not want this to indicate gender.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

With regard to what should be on the register and what should be on the card, BT stated that they would not want a person's transsexual/transvestite status recorded on any card.

BT said that for those transsexual people who could change their documentation there would be no disadvantage but they were concerned about transvestites who might have to show a card that shows legal status. BT was concerned that this might lead to harassment. This could also be the case of transsexuals in transition. They suggested that two cards could be issued, linked to one biometric but with differing names and sex. The card could be cross-referenced. They would be willing to help officials if Government decided to go ahead.

BS raised the same issue but suggested there should be no penalty for those whose appearance is at variance with their photograph due to their cross-dressing. They were also keen that the provisions for transsexuals who have made a transition, to change their documents, should remain.

15 TRANSPORT AND TRAVEL ORGANISATIONS

Distribution and contact

Copies of the consultation paper were sent to approximately 10 transport and travel organisations. Further distribution and awareness was aided by the Confederation of British Industry (covered separately under Employers' Organisations) and the Department for Transport.

During the consultation period, officials met with Transport for London and liaised with the Department for Transport.

Summary of Views of these Stakeholders

The responses received to the consultation included ones from the Council for Travel & Tourism (CTT – representing 12 UK organisations); the Transport and General Workers Union (TGWU); Transport for London and London Underground Ltd; British Airways; the Federation of Tour Operators; and the Association of British Travel Agents.

One organisation was against any scheme and had some major concerns. The other organisations analysed were broadly in favour of some form of card scheme.

The organisations have not responded separately to all consultation points, but all substantive comments are summarised below.

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

The TGWU's reasons for opposing a universal scheme was that it would, in reality, be a compulsory scheme.

“The Government may claim that its proposals do not amount to compulsion but, without doubt, the proposed universal entitlement card is a compulsory identity card by any other name. Every UK resident will be required to register and to produce the card to prove their entitlement to services, benefits, employment and legal residence. It is the view of the (TGWU) that, if you cannot access all of these entitlements unless you have a card then it is, by any definition, a compulsory card.”

The Transport and General Workers Union

One organisation was not in favour of an “all in one” card and did not feel that there was any need for biometrics, passport and medical records to be on the same card. It favoured an “everyday” card, which would be a simple card for transport access, basic local service access and micro payments.

Another view was that the more uses envisaged for a card, the more complex the arguments would be and the longer it would take to develop. A twin complementary card scheme was therefore suggested, which would permit quicker and easier development in both cases. This would be based on a voluntary passport card scheme alongside a voluntary or compulsory entitlement card, based on the driving licence system. Compulsory was seen as being more effective.

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

Of those in support, there was general agreement that a card scheme would allow for more efficient delivery of public services, but as employers, most transport organisations were not greatly concerned with this area. It was commented on that employment records would be too detailed to be contained on a single card.

There was support for linking travel services to a card scheme and organisations supported the concept of an entitlement card used as a travel document. It would lead to quicker and easier travel plans, so encouraging spontaneous travel to Europe, and provide proof of identity for domestic UK travel as well as helping to reduce electronic ticketing fraud.

However, comment was made that a new card could possibly increase identity fraud in the longer term.

One organisation stated that a card would provide a useful means of verification in areas of travel and tourism where proof of age is required, such as in bars and other licensed establishments.

Although some organisations considered that cards could be useful in combating illegal working, it was considered that it should not be the responsibility for the employer to monitor this. However, the TGWU stated that it did not make sense for the Home Office to issue 60 million cards in order to target a few thousand illegal workers. It suggested that other, carefully focused measures to clamp down on exploitative employers and gangmasters would be much more effective.

The TGWU stated that paradoxically a card could make life easier for criminals by allowing those who obtained fake cards to move around and operate more freely than now.

The cards could also potentially worsen relations with the police and the community with the potential to engender more discrimination against and harassment of ethnic minorities. Also, if the police did not have the power to demand the card, it would never be taken seriously as a worthwhile crime prevention tool.

One organisation commented that the inclusion of medical information on a card would not be wanted by many people.

COMBATING IDENTITY FRAUD (CONSULTATION POINTS 18-22)

No substantive comments were made on these consultation points. However, the TGWU stated that it considered that an entitlement card scheme would not significantly reduce benefits fraud as a good proportion of the people involved were unlikely to have bank accounts or legitimate employment records and would be taking cash in hand for employment. A card scheme might also encourage other new forms of fraud as new technologies emerged.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

There was widespread support for a card scheme based around a passport card. However, comment was made about the length of time it would take to cover everybody in the launch of a new travel card, if this was only issued when the main book was renewed. As validity is for 10 years, many people would have to wait several years until renewal was due.

The increased cost of the passport to cover the inclusion of the entitlement card facility was a major concern among several organisations, especially for family travel. It was suggested that the Government seek contributions towards the development costs from other sectors who would benefit from a card scheme, with the balance to be recovered through an appropriate charge for the card.

One organisation stated that it would like to see the National Insurance number and employment status included on the card.

The TGWU expressed great concern that the introduction of an entitlement card scheme could fuel intolerance and bigotry and would be used against people who look as if their immigration status could be in doubt. A card scheme might seriously hamper race relations in the UK by introducing the potential for discrimination by the state against the UK's black and ethnic minority communities.

The CTT fully supported the inclusion of biometric information on a card, as this would permit the automation of immigration controls at ports and airports and hence provide greater security and faster clearance through border controls.

Some organisations supported the inclusion of biometric information, although this would prolong the development and introduction of a scheme. Another considered the inclusion of biometric information an unnecessary complication and it was best to keep any scheme very simple.

One considered that employers would not have the facilities or experience to check the information.

One view was that incorporating a smartchip into a card would allow more data to be stored, in order to meet the requirements for further passenger data as a result of recent anti-terrorist legislation

No other significant comments were made on these consultation points.

DATA PROTECTION AND PRIVACY ISSUES (CONSULTATION POINT 35)

The TGWU voiced concern that the establishment of a national Government database with records of 60 million people would be a "Big Brother Database" with all the civil liberties issues surrounding it. There would be increased lack of respect for individual privacy and ease in the spread of potentially damaging mis-information.

16 GROUPS REPRESENTING TRAVELLERS

Distribution and contact

Copies of the consultation paper were sent to 5 organisations and 2 responses were received – from Friends, Family and Travellers Advice and Information Unit (FFT) and from the Gypsy Council for Education, Culture, Welfare and Civil Rights.

Summary of Views of these Stakeholders

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

The FFT were opposed to any entitlement card scheme as they felt it would ‘further exclude those people who are already marginalised or excluded from our society.’

The Gypsy Council for Education, Culture, Welfare and Civil Rights have had ‘a mixed response’ from their members. Some believed possession of an entitlement card would ‘drastically cut down the level of discrimination towards gypsy and traveller families’. Others felt that the database would be misused and entitlement cards would not cut fraud and would be easily copied by criminals.

FFT were concerned that people who are most vulnerable in society will be penalised with the denial of services. They stated that the travelling community already had difficulty in accessing vital services and the FFT failed to see how an entitlement card would benefit the travelling community.

FFT did acknowledge there would be some gains to a national population register but were concerned for those individuals whom for whatever reasons would fall outside of this register.

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

The FFT felt that any entitlement card scheme would have **some** impact on the “pull factor” for illegal immigrants entering the country but would do little to change the “push factor” i.e. the reasons why people want to flee their country. Entitlement cards would therefore have only a marginal impact.

FFT also felt that entitlement cards would have no impact on crime but the card itself would be 'profitable for the criminal world.'

FFT would see a medical card as useful but were concerned about how change of details would be kept up-to-date.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

The Gypsy Council for Education, Culture, Welfare and Civil Rights felt there would be practical difficulties in issuing cards to gypsy and traveller families. They stated that 30% have no permanent address, and many families were forcibly evicted all the time, some as many as 2/3 times a week.

They also raised concerns about the need to sign a card as they stated that many travellers cannot read or write and that nationality may somehow reflect the fact that someone is a gypsy or a traveller. They also stated that many gypsy families do not have birth certificates and therefore it may be difficult to 'trace' identity.

They felt that the production of an entitlement card would not necessarily result in services being provided and they wanted to know if there would be legal means to force a service provider to provide a service to someone who was entitled.

They offered to talk to officials to indicate how a scheme could be helpful rather than oppressive if the Government decided to go ahead.

17 WOMEN'S GROUPS

Distribution and contact

Copies were sent to 2 groups, which generated 3 responses – from the National Association of Women's Clubs, the National Council of Women in Great Britain (NCW), and the Soroptimist International (SI) of Yorkshire.

Summary of Views of these Stakeholders

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

The National Association of Women's Clubs were in favour of an 'ID card' with photograph to be 'carried by all UK Citizens'.

The NCW were in favour of a universal entitlement card.

SI would favour a voluntary scheme initially, with it becoming compulsory in the future, depending on take-up, use, and costs. They felt the information held should be limited to name, signature, photo, DOB, fingerprint/iris pattern. They were also supportive of a unique personal number and expiry date of cards. They were not supportive of a population register.

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

SI thought a card would be useful for travel and to prove age and identity, and would also improve delivery of Government services. They saw a role for entitlement cards in reducing illegal immigration and illegal working. They did not think information should be used to maintain the electoral register or facilitate new ways of voting but would be keen to see the police and security services have access if needed (including access to biometrics). They felt it should not hold medical data.

The NCW would prefer to see cards paid for by tax increase rather than fees and they thought a high charge for a card would encourage evasion.

SI thought that an entitlement card might help reduce administrative burdens on police but could not see it reducing crime.

COMBATING IDENTITY FRAUD (CONSULTATION POINTS 18-22)

SI thought that an entitlement card scheme could be useful but was not sure it would be cost-effective.

They were also of the view that the police and Security Services should have access to the database, including biometric information if investigating serious crime. They also thought that Government departments should have access for stated purposes but did not agree that the private sector should have access.

SI thought that an offence of identity fraud should be introduced, with justified exceptions.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

The NCW considered that a single card would be less confusing but saw the advantage of a family of cards in the case of loss. SI supported a family of cards and were of the view that the card should be available from birth and that young people should be invited to apply for a card when issued with a National Insurance number, if they have not yet got a card.

They also thought that foreign nationals should receive a card as part of the entry process and that this should be time-limited in line with work permit authority.

Responses from this stakeholder group did not feel that a private sector service should be procured to check biographical data.

The NCW would support the recording of biometrics, provided it was backed up with an additional feature. It was argued that two features would be required to ensure absolute identification. SI were also supportive and thought it should be stored after the death of the cardholder to prevent fraudulent use of the identity document.

SI did not see the benefits of a smartcard.

It was felt that there should not be an overload of information on the card.

On ways around difficulty in participating, one view was that there should be the facility for a second individual to operate the card with the holder's permission.

Some benefit to employers of checking a card to determine eligibility to work was seen.

18 YOUNG PEOPLE

Distribution and contact

Copies were sent to 8 organisations. Responses have been received from the Learning and Skills Development Agency (LSDA), Universities and Colleges Admissions Services (UCAS) and the British Youth Council (BYC).

During the consultation officials had a meeting with the Children's Rights Alliance for England's (CRAE) panel of young people and worked with the CRAE to produce a young person's version of the consultation paper which was posted on the CRAE website. Officials also worked with Department for Education and Skills (DfES) to include references to the card on websites linked to the new citizenship components of the national curriculum. Some of the main body of focus groups included younger groups (16-20) and we also included some discussion of entitlement cards in focus groups on Connexions cards run for DfES.

The BYC conducted a three-month survey of their members, the results of which were formally presented to interested parliamentarians including a Home Office Minister.

The paper raises a number of issues of particular interest to young people such as whether a card would be a useful means of proving age and at what age a card should be issued.

Summary of Views of these Stakeholders

THE OPTIONS FOR AN ENTITLEMENT CARD SCHEME (CONSULTATION POINTS 1-8)

Responses were broadly positive.

The BYC submitted a response to the consultation on Entitlement Cards and Identity Fraud based on a three-month research project to gauge the views of young people from the BYC's member organisations. The survey received responses from 143 young people across the 11-25 year age range.

The findings were broadly positive with 65% of young people in favour of holding a 'non-compulsory' entitlement card that would provide general information about the card-holder and would help people gain entitlement to products and services. 28% of the young people were not sure and 7% were against the idea.

Young people were concerned about whether someone would be able to access their card if it were lost or stolen. These concerns about access to information also manifested themselves in the young people's views about what information should be held on the card, and what should be held on the chip. They felt that information should be limited on the card surface and instead should be held on the chip. The BYC felt that people should be able to access that information.

The BYC stated that there was a clear interest in the idea of an entitlement card but some young people would like more information about a card scheme before making a decision.

As an organisation, the BYC were not in favour of a compulsory card and were concerned that a universal card is a compulsory card by another name. They mentioned that a card should be about inclusion rather than exclusion and thought it would be regrettable if the scheme were merely sold on the basis of what it would stop rather than what it would enable. They suggested that the Government should talk about providing proof of citizenship rather than tackling illegal immigration. They wanted information regarding what sanctions would be put in place for non-compliance.

The LSDA had no preference for voluntary or universal cards but made it clear that if they were voluntary, there would need to be other recognised ways for someone to prove their identity as they would not want learners who did not use the card to miss out if access to support were conditional on the production of a card.

POSSIBLE USES FOR AN ENTITLEMENT CARD (CONSULTATION POINTS 9-17)

The BYC saw a role for the card in protecting the rights and entitlements of workers (particularly young people) who are 'often exploited through illegal employment practices.' The survey also indicated that young people would welcome a card to provide them with an effective means of proving their age and improve access to services. The young people were also keen that a card be linked to discounts.

The LSDA felt that cards could provide a simple way for individuals to identify themselves for exams and assessments and said the need for this would increase with the rise in assessments and learning on-line and distance learning. They also thought cards could prove a useful way of tracking and aggregating individual learners' achievements via a unique personal number.

“UCAS would find an entitlement card scheme useful in authenticating an applicant’s identity, the automatic capture of personal data and data-matching with Examination Boards/Awarding bodies.”

“As qualifications are delivered in increasingly flexible, unit based and bite sized chunks, the tracking and aggregation of individual learner’s achievements becomes more complex.”

UCAS

UCAS would like any unique personal number to be written on application forms so they could use this number to automatically extract personal data from the central register. They thought the number should be visible on the card so cardholders could use this in correspondence or over the phone. UCAS said that full benefit would only be achieved through a universal scheme. They would see this as a useful additional measure to their current verification checks against fraudulent higher education applications, provided physical access to the card was not necessary.

COMBATING IDENTITY FRAUD (CONSULTATION POINTS 18-22)

UCAS explained that identity fraud relating to students is not usually about someone trying to gain access to Higher Education but to student finance. It welcomed proposals to develop an identity fraud work programme.

UCAS would support increased strength in checking passports and driving licences as they were both used to prove identity.

HOW A SCHEME MIGHT WORK IN PRACTICE (CONSULTATION POINTS 23-34)

Young people in the BYC survey did not seem to like the idea of a family of cards though there was little explanation of what this would mean.

UCAS were in favour of building on passports and driving licences as it would avoid the need to set up a new organisation and would reduce costs.

In the BYC survey, 87% of the young people felt that the card would be a useful way to prove age and 80% thought the card should be available at age 16 due to the fact that they can then buy lottery tickets, cigarettes and get discounts on certain products and services.

UCAS would support issue of entitlement cards alongside National Insurance numbers at 15 years and 9 months-though they mentioned that some uses would indicate they should be used at a younger age.

Young people in the BYC survey would welcome using the card to get discounts (97%) and if it improved access to services. BYC would be concerned if this meant that information would be used commercially.

Transport is a key service for young people and many would find a card attractive if it gave them easier access to transport.

Young people also liked the idea of using one form of identity rather than many (this may explain their dislike for a family of cards.)

Young people also thought the card would be useful if it made it easier for employers to check their identity when applying for a job.

Most (78%) of the young people in the BYC survey were supportive of the use of biometrics to make the cards more secure and more difficult to fake. UCAS thought this facility would be useful but it was not one UCAS would use.

Young people in the BYC survey saw the benefits of a chip card as keeping information that they wouldn't want displayed on the face of the card secure.

UCAS considered that smartcard technology would increase use and versatility of card.

UCAS were of the view that failure to notify change of details should probably be an offence. It would like to see name and address, DOB, gender, country of birth, nationality, and previous surname included.

Annex 1

HANDLING OF RESPONSES RECEIVED

In order to ensure compliance with the Cabinet Office Code of Practice on Written Consultation, we are obliged to make public the responses to the consultation. However, consideration also has to be given to respect for the privacy of individuals.

The vast majority of the stakeholder and other organisations who responded have no objection to their responses being made public. The summaries of responses for each stakeholder group therefore lists these organisations and attributes specific quotations to them.

Many members of the public responded as a follow-on after we sent them copies of the paper, and others specifically referred to all or some of the consultation points contained in the paper. However, in the majority of cases no direct reference has been made to the consultation document. A lot of the responses have clearly been generated as a result of media publicity.

It cannot therefore be presumed that all respondents were aware that their names might be published and it would have been necessary to seek their explicit permission to do so.

All views, whether from stakeholder groups, other groups and organisations, or members of the public, that have presented new or added value information have been considered, discussed and included in this summary. The omission of a complete published list of names does not contravene the Code of Practice, so long as all these views have been taken into account.

In this light it has been decided not to publish names of members of the general public and to keep anonymous the quotations extracted from individual responses.

Annex 2

LIST OF THE ORGANISATIONS WHO TOOK PART IN THE CONSULTATION EXERCISE

Aberdeen City Council
Aberdeenshire Council
AMS Management Systems UK Ltd
Argyll and Bute Council
Association for Payment Clearing Services
Association of British Bankers
Association of British Travel Agents
Association of Charity Officers
Association of Chief Police Officers
Association of Chief Police Officers (Scotland)
Association of Community Health Councils for England and Wales
Association of Electoral Administrators
Association of Licensed Multiple Retailers
Association of Scottish Police Superintendents
Aurora Computer Service Ltd
Barclays Bank
Bassetlaw Citizens Advice Bureau
Beaumont Society
Beaumont Trust
Bell Group Plc
Belvedere GB Ltd
Birmingham City Council
Borough of Basingstoke and Deane
Brent Council
Bristol City Council
Britannia Airways Ltd
British Airways
British Bankers Association
British Computer Society
British Telecommunications Group plc
British Youth Council
Building Society Association and the Council of Mortgage Lenders (joint response)

Cannock Chase Council
Caradon District Council
Charter 88
Children's Rights Alliance for England
Citizencard Limited
City of Edinburgh Council
Civil Service Pensioners Alliance Bognor Regis, Essex, Norfolk & Suffolk, West Sussex branches and North-West London group
Colchester Borough Council
Commission for Racial Equality
Confederation of British Industry
Cornish Key Partnership
Confederation of Indian Organisations
Convention of Scottish Local Authorities
Co-operative Group
Copytag Ltd
Council for International Education
Council for Travel & Tourism
Countryside Agency
Credit Industry Fraud Avoidance System
Cross Match Technologies Inc.
Cubic Transportation Services Ltd
Customers Voice
De La Rue Plc
Defence League of British War Veterans
Denbigshire County Council
Direct Marketing Association
East Ayrshire Council
East Dorset District Council
East Riding of Yorkshire Council
Edentity Ltd
Electoral Matters Panel for the Society of Local Authority Chief Executives and Senior Managers
Electronic Data Systems Ltd
Envigour
Erewash Borough Council
European Forum for Electronic Business
European Information Society Group
Falkirk Council
Fareham Borough Council

Federation of Tour Operators
Financial Services Authority
Friends, Family and Travellers Advice and Information Unit
Fujitsu
Garrowhill Community Council
Gemplus Ltd
Great Yarmouth Borough Council
Gypsy Council for Education, Culture, Welfare and Civil Rights
Halifax and Bank of Scotland
Hampshire County Council
Helping Charities, Helping People
Highland Council
Hinckley & Bosworth Borough Council
Immigration Advisory Service
Immigration Law Practitioners' Association
Information Commissioner, Richard Thomas
Intellect
Joint Council for the Welfare of Immigrants
KeCrypt Ltd
Kemp Little LLP
Kerrier District Council
Kingsbridge Age Concern
Kingston upon Hull City Council
Lancaster City Council
LaserCard Systems Corporation
Latent Image Technology Ltd
Law Reform
Law Society
Law Society of Scotland
Learning and Skills Development Agency
Leicester City Council
Liberty
Licensed Victuallers Association
Local Government Association
London Borough of Camden
London Borough of Newham
London Boroughs Fraud Investigators Group
London Team Against Fraud
London Underground Ltd

Malden District Council
Managed Migration
Maryhill Constituency Labour Party
Microsoft Ltd
Migration Watch UK
MoD Veterans Group
National Association of Citizens' Advice Bureaux
National Association of Women's Clubs
National Consumer Council
National Council of Women in Great Britain
National Federation of Post Office and BT Pensioners
National Federation of Retail Newsagents
National Parliamentary Committee of Licensed Victuallers Association
New Forest District Council
North Warwickshire Borough Council
Northrop Grumman Mission Systems
Oracle Corporation
Orkney Islands Council
Passenger Shipping Association
Pensioner's Voice
Philips Semi-conductors
Police Federations: England and Wales, Scotland and Northern Ireland
Portman Group
Quizid Technologies Limited
Refugee Council
Renfrewshire Council
Rethink
Ribble Valley Borough Council
Road Haulage Association
Rochford District Council
Rotherham Metropolitan Borough Council
Royal Mail
Royal National Institute for the Blind
Royal Society for Prevention of Cruelty to Animals
Safelayer
SAGEM SA
SANGAM- Association of Asian Women
SlumbergerSema
Scottish Police Authorities Forum

Scottish Trades Union Congress
Setec Oy
Sikhs in England
Smallman & Loveday Ltd
Smart Card Club
Snap Digital Imaging Ltd
Society of Local Authority Chief Executives and Senior Managers
Soroptimist International of Yorkshire
South Stafford Council
Superintendents Association of Northern Ireland
Surrey Heath Borough Council
Teeside District Council
Tobacco Manufacturers Association
Tonbridge & Malling Borough Council
Torbay Council
Transport and General Workers Union
Transport for London
TSSI THORN Secure Science Ltd
Tyndale Council
UK Youth Parliament
Ultra Electronics
Universities and Colleges Admissions Services
University of Cambridge Computer Laboratory
Validate UK
Veritec INC
Viisage
Visual Security International Limited
Wakefield Metropolitan District Council
Waverley Borough Council
Welsh Language Board
Welsh Local Authorities Forum
West Dumbartonshire Council
West Lothian Council
Wheels Project Ltd
Wrexham County Borough Council
ZETES MNA & Alliances



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