National Identity Scheme

Options Analysis - Outcome

The National Identity Scheme (NIS) will deliver a universal identity capability for all those who are legally entitled to live and work in the United Kingdom. The Identity and Passport Service (IPS) has reviewed options for implementation of the NIS, building on the Strategic Action Plan published in December 2006. Senior officials from IPS, the Borders Agency, the Treasury, Cabinet Office and Office of Government Commerce have contributed to the options analysis.

This note documents the outcome of the options analysis, which was supported by three workshops. The purpose of the three workshops was to agree the:

1. Objectives of the National Identity Scheme;

2. Scope of the solution and design principles to be applied; and,

3. Delivery strategy for the Scheme.

Next steps arising from these workshops are outlined at the end.

Objectives for the National Identity Scheme

The objectives for the NIS are to protect the public and make life easier. Sub-objectives were prioritised into categories; Essential, Highly Desirable, Desirable to articulate their relative priority. All the sub-objectives are considered to be important and will be delivered. Details of these objectives are given in Annex 1.

Delivery Options for the National Identity Scheme

There are four potential 'pure' Scheme models. These are;

1. Citizenship (Borders) Model - *"I want to know you have a RIGHT TO BE HERE"*

The focus of the Scheme is on; borders, security and police; providing security as a public good.

- Secures the UK's borders – "counting them in and counting them out".

- Includes passport, BRP, nationalisation certificate.

- Designation of existing documents is the likely take-up driver.

- Benefit driven by higher integrity than existing passport.

- Real benefits are dependent on having capability to read passports and cards at borders.

2. Trusted Relationships Model - *"I want to know who YOU are"*

The focus of the Scheme is on; those in positions of trust or employment; personal safety of me or my family.

Annotations (NO2ID):

- *[building on]* Far from "building on", this is a radical change of strategy involving abandoning the passport as the primary enrolment route. Why has it not been announced? Do ministers even know? Their statements come across as lying (if they do), or clueless (if not).

- *[Senior officials from IPS, the Borders Agency, the Treasury, Cabinet Office]* i.e. this document, or the content of it, is known by senior officials in ALL of these agencies

- *[Objectives of the National Identity Scheme]* Were these not defined by the primary legislation, the Identity Cards Act 2006?!

- *[make life easier]* "make life easier" - for whom? This must refer to the Objectives appendix, which makes it pretty clear it is not the public's ease that is being considered.

- *[four potential 'pure' Scheme models]* The four 'propositions' are considered in terms of marketing, not the primary motivations of the scheme

- *[I want to know you have a RIGHT TO BE HERE]* Note the tone, and ask yourself who is "I" in this sentence?

- *[Benefit driven by higher integrity than existing passport]* What benefits? The ordinary traveller gets nothing extra from having a different sort of document approved at the border.

- *[capability to read passports and cards at borders]* Something the US-VISIT scheme has singularly failed to do, despite dealing with far smaller volumes than pass through UK borders each year

- *[Real benefits are dependent on having capability to read]* "Read" is an interesting choice of word. It implies data collection at borders, rather than merely verification/ approval of documents locally, which is what security experts recommend - and the traditional function of passports. The scheme in other words posits the card will function as a tracking device, in addition to being a credential.

- *[personal safety of me or my family]* Expect further appeals to public fears, particularly about safety of children (banned in commercial advertising!)

- *[I want to know who YOU are]* Note again that "I" won't be the individual citizen. We won't be able to check each other's ID cards, but must trust that someone else has (and that the system works)

- Enables individuals and businesses to establish the identity of people in positions of trust or responsibility.

- Enrolment strategy and ensuing benefits are closely related to the characteristics of the target groups.

- Nature of the group(s) selected drives the requirement for the infrastructure (especially face vs. fingerprints).

- Employers would play an important role in implementation of the Scheme.

3. Access Model - *"I want joined up services which meet MY NEEDS"*

The focus of the Scheme is on; access to public services; an enabler of service transformation.

- Scheme focused primarily on providing a range of public services across departments to meet the needs of individuals within specific target groups – typically those with multiple public sector needs.

- Benefits would be driven by investment in the joining up of services across departments, and through simpler identity verification and remote authentication.

- Supports and links with the transformational government agenda (data sharing, shared services, etc).

4. Inclusion Model - *"I want to be able to prove who I AM"*

The focus of the Scheme is on; proving who I am quickly and easily; making life easier for people.

- Dependent on provision of a compelling series of public and private sector services to target groups, enabling individuals to prove their identity "quickly, easily and safely" in the way proposed in the Crosby report. The preferred target group is young people in the UK, and the intention would be to encourage take-up through development of specific services e.g. proof of age.

- Real benefits are dependent on investment by the private sector in services to meet the needs of the target group. Crosby suggests that high levels of take-up among the target group would be required to trigger such investment.

The models represent different stages in the Scheme, rather than being discrete options.

- Most mature international schemes draw benefits from each of the Models – primarily because high take-up has been achieved.

- Schemes that begin with public protection (eg Hong Kong) tend to be successful and add services later when high take up has been achieved.

- Schemes that start with services depend on early delivery of a fully functioning service proposition that can drive take-up to the level required to trigger other

benefits. This can be difficult to achieve (eg Finland).

The nature of the different models suggests some key design principles for roll out.

- We need to set the tone for who carries the card and why, early on: international research suggests that first impressions have a prolonged impact.
  - Citizenship (Borders) and Trusted Relationships models have benefits that are narrow in nature (tighter borders and safer interactions), but are easier to understand and market: *you tend to carry the card in specific contexts*, e.g. when you travel, at work, etc.
  - Inclusion and Access models have benefits that are broader in nature (based on common usage of the card), but are more difficult to understand and market: *you carry the card because you need it every day.*
- The Citizenship (Borders) model requires a high proportion of take-up and a higher integrity Scheme, and requires the capability to read passports and cards at borders – *suggesting you don't start here.*
- The Access model requires a high proportion of take-up and investment in joined up services across Government departments to drive benefits – *suggesting you don't start here.*
- Trusted Relationships and Inclusion can be focused on specific groups – *suggesting that you could start here:*
  - Starting with students or other young people in first half 2009 seems to be the quickest option and aligns with HMT thinking on preferred target groups. But it remains an extremely high delivery risk. It also relies on creating voluntary demand with other public/private stakeholders, with the consequent risk of rejection.
  - Starting with a 'trusted relationship' group will take longer and needs to be aligned with other priorities and other agencies. But the linkage of identity assurance and vetting/CRB etc provides a strong narrative and 'designation' can be used to enforce usage.

We recommend an approach that targets a 'trusted relationship' group in the second half of 2009, alongside an initial group of young people from early 2010. Further development would be modular, initially focusing on increasing the reach of the 'trusted relationship' and 'inclusion' products, with the latter ideally having a very wide reach. Subsequent phases would involve increasing the level of identity assurance in line with changing technology and threat levels, as higher levels of assurance become cost-effective and deliverable. Each phase would have to be manageable within a timeframe over which technology was reasonably predictable (under 5 years).

Design principles for the National Identity Scheme

The design principles relate to the core components of the NIS; Enrolment; Registers; Tokens and Services.

Margin annotations (left):

Note the concern to "set the tone" - everything hinges on how the scheme is sold to the public. Note also the word "carries", which ministers have repeatedly insisted is not the intention.

Which conflicts with the fact that the Home Office is starting with 'ID cards for foreigners' (actually biometric residence and work permits for some non-EEA foreign nationals).

This paragraph is key. N.B. "HMT thinking" may refer to the Treasury's 'Citizen Information Project' that was quietly merged with the Home Office ID scheme shortly after the passing of the Identity Cards Act 2006.

Which is the precise timeline shown in the 'NIS Delivery Strategy' PowerPoint, dated 20th December 2007.

The terminology hints at the direction of thought: citizens (and their rights) are embedded somewhere within and underneath the technological schemata. Notably none of the design principles relates to privacy or control for the subject. People don't feature as having rights, or as owners of their identity. At best they are bystanders and occupiers of market segments.

Margin annotations (right):

Contrary to assurances, the scheme is about *getting people to carry the card* - "voluntarily". Cf. Andy Burnham: "I take the view that it is part of being a good citizen, proving who you are, day in day out." This is a novel constitutional model.

Which will cost far more than the projected costs of the central ID scheme itself.

Explicit mention of link to CRB checks. The "trusted relationship" group will at some point therefore include teachers, nurses, carers, maybe volunteers - who must submit to life-long enrollment on the National Identity Register or lose their livelihood.

The unions might just have something to say about this...

In other words, the plan is to issue people with low-grade, fundamentally insecure ID cards (how secure will people be told they are?) and only later try to improve them. If the technology works. And if it doesn't cost too much. These 'delivery options' are all about getting as many people onto the ID database as possible, as quickly as possible - without giving a stuff about genuine citizen benefits or security, except as marketing.

The first bullet point alone begs the question of how the costings will be structured, given that it is now implausible that passports are the justification. "We would incur 70% of the costs anyway for biometric passports," was always nonsense - derived, NO2ID's analysis of statements suggests, while this was still a 10-year programme (2006-2016), from the observation that 70% of the population renews its passport in 10 years. But it is now patent nonsense. Passports are already ICAO compliant, if an "upgrade" is to be delayed till 2012, then expenses on registering people on new systems to bridge that gap are waste solely incurred in connection with the ID scheme. Will they still be hidden? If so, which department's budget will they actually come out of?

i.e. fingerprinting is neither an end, nor a fundamental requirement of the scheme.

Target groups for enrolment, then fingerprint them later (perhaps) once they've been suckered in. Once on the register, you are on for life and subject to every regulation and obligation that is promulgated about it.

The term "enrolment services" is soaked in hypocrisy. Normally a "service" is something you want, not something that is forced upon you. In this jargon our armed forces wouldn't exist to provide defence to the nation, but "death services" to the enemy.

Define "market failure" when the whole point of the scheme is the government saying it can manage your identity.

What sort of risk assessment, and how? The person who gets picked for investigation is likely to be the careless or forgetful ordinary punter, not someone consciously making a neat, consistent

This single phrase makes the former and current Prime Ministers, and every Home Secretary and Home Office minister since 2006 a liar. For explanation, see: http://www.no2id.net/news /pressRelease/release.php ?name=IDCardCoercion

1. Enrolment

- On the assumption that at some point in the future we will need to include fingerprints in the passport, we should eventually work towards a Scheme including a high proportion of fingerprint enrolment, driven by designation of the passport, once an affordable and convenient solution for enrolment has been developed. This is important as an ID card is to be used for travel in the EU.

- Defined groups can be identified and targeted for enrolment. The level of integrity with which individuals are enrolled should be driven by the services that individuals will access. Individuals within these groups may enrol at a lower level of assurance, but then be asked to provide fingerprints later, if they need access to products or services that require a higher level of assurance.

- We should leverage existing databases such as the DWP's Customer Information System to stimulate applications through marketing to target groups. For example, rising 16 year olds could be sent pre-populated forms for the 'inclusion' card, based on existing cross-referenced databases, which would only need to be signed and returned. We also agreed to consider further the option of sending cards to selected individuals whose identity was already verified, requiring only an 'activation process' to complete formal enrolment.

- IPS will look at a broad range of options for the delivery of enrolment services to customers. These services will include, in the near term, the enrolment of fingerprints and photographs, but, in time, could include the delivery of the full application and enrolment process (subject to standards mandated by IPS). IPS will take market provision of the service as the starting point, and seek to address any market failures where possible, before committing to a long term solution. It is envisaged that this may take time and that where early progress is required IPS may act more proactively to deliver a solution.

- Interviews for some groups will be necessary, but should only be used where required by risk assessment. Where interviews are required, they should be carried out in as flexible a manner as possible to minimise customer inconvenience and reduce dependence on a fixed estate. It is likely that the number of interviews necessary would be well below the 10% level in the current business case.

- Universal compulsion should not be used unless absolutely necessary. It cannot be delivered quickly due to the need for inevitably controversial and time consuming primary legislation and would pose serious political, enforcement and resource challenges.

- Various forms of coercion, such as designation of the application process for identity documents issued by UK Ministers (e.g. passports), are an option to stimulate applications in a manageable way. Designation should be considered as part of a managed rollout strategy, specifically in relation to UK documents. There are advantages to designation of documents associated with particular target groups e.g. young people who may be applying for their first Driving Licence.

- Photograph and signature will be enrolled for all. For the Trusted Relationship product, ten fingerprints would also be enrolled. Enrolment of fingerprints on the Inclusion product would depend on the availability of an affordable and convenient (ideally market-based) enrolment solution. This might be in later phases, with the

i.e. Authentication by Interview (AbI) and the interrogation centre network could prove to be a complete dead end and waste of money

Marketing via existing databases. Send 16-year-olds part-filled forms: "This is you, this is". Automatic enrolment for people they are satisfied about. In other words, the notional "money launderer" or "terrorist" or "spy", just has to keep his head down in a plausible identity...

So the "current business case" has been used to justify commissioning a network of interrogation centres across the UK that will leave 90% of passport (and eventually ID card) applicants unchecked? This massively deviates from the impression given by ministers that ID interrogations are absolutely necessary to prevent fraudulent applications.

Quick delivery and avoiding challenge, are revealed as the real priorities. But 'quick' is a relative term for a 10-to-20-year programme.

The idea of one's signature being "enrolled", and therefore offered up for sharing throughout the public sector ought to be somewhat unnerving. This is the opposite of the "protection against fraud" that ministers jabber about. [Cf. Peter Lilley on fraud facilitated by the online facilities of the Land Registry - Hansard 7 Nov 2007 : Column 238]

initial inclusion product using biographic data. Chip and PIN would be an option for both cards.

Registers

- The register for the Scheme (the National Identity Register) should be based on an existing Government technology asset, the Department of Work and Pensions' Customer Information System (CIS).

ID Cards

- There will be an ID Card. The nature of the card issued should be proportionate to the services that the user wishes to access. People wishing to access services with a higher demand for integrity will be issued with a higher integrity card, and vice versa.

- As the card is to be used for travel, it will not be issued to a lower standard than that used for other travel documents (eg passport). The card will therefore include a photograph, signature and, from such time as we do so for passports, fingerprints.

Services

- The package of services offered is a critical component in encouraging take-up amongst the selected target groups.

- The NIS will become an identity "utility" to help deliver public services and will in time support the implementation of personalised services.

- The NIS will also support the delivery of identity services to the private sector.

- It is recognised that the market may be the most efficient mechanism to innovate in the development of services based on the NIR.

Next Steps

The next steps fall into three categories; developing the tactical solution and business case for 2009, so that this work can begin; documenting the outcome agreed by this review as a Scheme Strategy; developing the medium term solution and business case in less detail.

1. Further develop tactical solution (by end of January 2008)

- Confirm target group(s) for 2009-2011 (a trusted relationship group, followed by young people) – with Ministers and other key stakeholders

- Confirm customer proposition and delivery approach for these target groups; application and enrolment; tokens; technical solution; secondary legislation; identity services

- Develop business case and agree with HMT and others – detailed for 2009, quite detailed for 2010/2011

2. Draft version 1 of Scheme Strategy (initial version by end of January 2008)

- Summarise the outcome of the review (this document)

- Formally document and agree the Scheme Strategy (as per NIS Management Reference Guide), ensuring alignment with the Crosby report where this is appropriate

- Confirm a high level approach for 2012 onwards, working with other departments, but with less detail required

3. Develop medium term solution business case (Q1 2008)

- Develop business case and agree with HMT and others – less detailed for 2012 onwards

This should be read in conjunction with the phases of the scheme, which are:

2008 - Foreigners (Borders 1) [populist move] How many and who? NO2ID has heard estimates as low as 10,000 in 2008.

2009 - Trusted Relationships [populist move] Again how many and who? Unless they are just planning to issue a card warranting a CRB check or similar - which would be a significant dilution - how could this be done? A Big Bang (per sector) would be massively costly and difficult to do, if there's a full interview, dossier and fingerprints etc, but phasing-in is difficult to justify.

This phase is most susceptible to actual resistence, whether by people standing on the NO2ID Pledge - www.no2id.net/pledge/ - or just increasing the costs of providing services in those targeted sectors as people fed up with being pushed around move away from them. (Cf voluntary sector difficulties over CRB checks.)

2010 - "inclusion" [coercion begins with the weak] Actually denial - 'assisting' young people when they "open their first bank account, take out a student loan, *etc*." It seems the IPS is proposing that you won't be able to get a job, except cash-paid labouring, or education beyond 16? 18? without an ID card.

2012 - UK Citizens (Borders 2) [coercion continues with bait-and-switch, incidentally removing what we assume to be our universal human "right" to leave and re-enter our home country] "Broader take up should be driven through the designation of the passport when we scale up to large scale issuing of cards, *ensuring allignment with other Schengen countries*." Has IPS made a decision the Prime Minister should know about?

It looks like Renew for Freedom - www.renewforfreedom.org - tactics may remain effective for some time yet. We started that expecting collection of passport data to change radically from late 2007 onwards. It didn't, and clearly it is now being put back further. So there are potentially five additional years for public resistance to build up against passports and denial of travel being used as a lever.

The question remains whether AbI interrogations for gap-year students will successfully subjugate or arouse that generation.

Annex 1 – Objectives for the National Identity Scheme

Fundamental	Highly Desirable	Desirable
• Improving efficiency and effectiveness of border controls	• Improving efficiency and effectiveness of cross government data sharing; enabling delivery of personalised public services	• Improving vetting and barring more generally
• Improving efficiency and effectiveness of in-country immigration controls		• Easing the processes for individuals and organisations requiring evidence of identity and notification of changes (fixing identity)
• Improving efficiency and effectiveness of compliance with illegal working regulations (know your employee)	• Improving efficiency and effectiveness of compliance with vetting and barring procedures in respect of children and vulnerable adults	• Ensuring high UK international credibility in terms of identity assurance
• Reducing incidence of serious organised crimes using false or multiple IDs by making it harder for criminals to obtain false IDs	• Improving detection and solution of crime	• Increasing public reassurance in ID assurance
• Reducing the risk of terrorist incidents	• Reducing abuse of age based access to products and services	• Reducing fraud against private individuals and business enterprises perpetrated by false identity
	• Reducing fraud against public sector perpetrated by false identity	• Improving efficiency and effectiveness of compliance with money laundering regulations (know your customer)

Marginal annotations (left):

Makes sense only in a "papers please!" Britain. Unless they are suggesting that the BIA currently cannot detect forged documents.

Cf. "Know Your Customer". Employers have no particular expertise in forged documents. Unless they are to report *all* employment to the central database, or pay IPS for "verification services", then how would it help?

Aren't these all the same thing? "Money laundering" means something different to IPS than to the public if it is not "organised crime". The government-centred view is rather given away by its ranking prevention of fraud against the public sector as more desirable than prevention of fraud against individuals and businesses. Contrary again to ministerial pronounce-ments about the purpose of the scheme being to help citizens secure their own identities.

On what evidence?!

Marginal annotations (right):

What kind of "vetting and barring" is contemplated beyond the established sorts addressed under "highly desirable"?

Isn't this circular? Requirements for notification and identification are generally imposed by government. "Making it easier to do what we tell you," doesn't seem like a great selling point.

This implies that IPS considers it "highly desirable" to record on the NIR any time you buy alcohol, glue, or an edged tool, rent or buy a DVD, or enter a cinema, pub or club... (etc) Which is the realm of complete paranoia. Surely they can't really mean it?

Bottom text:

The police-state reasserts itself.

All five 'fundamental' objectives, 4 of 5 'highly desirable' objectives, and 4 of 6 'desirable' objectives are national and international policing and order issues. All but one - "Increasing public reassurance in ID assurance" - are gains for big government with little or no benefit to the citizen, though even that single exception is arguably a gain for government: such "reassurance" could only arise if people believe in the ID system itself.