

# "The Green Paper on Identity Cards" consultation - A response from the Centre for Computing and Social Responsibility

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## **Introduction**

The Green Paper on Identity Cards was published in May 1995. In his foreword, Michael Howard, the Home Secretary said,

*"For many years there has been growing public and parliamentary interest in the question of identity cards. ... The Government has already announced that it is to introduce a photographic driving licence and a card for the payment of pensions and other social security benefits. ... [A national identity card] could make access to state services easier. It would serve as a useful and convenient travel document. An identity card would help the police in combating fraud and other crime, assist publicans in preventing under-age drinking and shop owners in stopping the sale of cigarettes and adult video tapes to young teenagers. At the same time it could provide citizens with a secure and reliable way of proving their identity."*

Whilst these are laudable statements, there are many issues of concern which have to be addressed before any form of identity card is introduced. This response is an attempt to articulate some of these concerns thus contributing to a more balanced view than the Green Paper on its own provides.

The Centre of Computing and Social Responsibility has canvassed opinion around the world in preparing a response to the Green Paper. We live in an age where citizens are becoming more and more dependent on digital icons, such as credit cards, national insurance numbers and PIN numbers, in order to live and work. Those not in possession of such icons will find it difficult to exist and will become increasingly disadvantaged. The identity card is seen as yet another icon but one which is more embracing and having greater potential to alter society radically. Whilst there are advantages to having an identity card as discussed in the Green Paper, it must be clear what price is to be paid and by whom for these advantages to be realised. This response is an attempt to raise the issue of the social cost in introducing identity cards in the UK.

The response has been structured according to the points raised in Para 8.6 of the Green Paper.

## **Response Points**

### **Would an identity card costing less than a full passport be regarded as a convenient travel document for use within Europe and possibly elsewhere? (Para 2.8)**

Such a move might prove beneficial but only if the identity card was universally accepted and that currency was guaranteed. If this were the case, the need for a passport would be called into question.

### **To what extent would an identity card be added value in providing proof of age? (Para 2.12)**

If identity cards were valid for between five and ten years (Para 2.7) then there would be problems of changing physical characteristics and signatures particularly for young people. It is unclear at what age identity cards would be issued. Young teenagers often

have difficulty in proving how young they are in order to gain concessionary fares, tickets and other offers.

## **To what extent would an identity card be helpful to individuals in banking and retail transactions? (Para 2.15)**

The inherent problems associated with credit, debit, cash and cheque cards would remain. In addition those without such a card would be disadvantaged through restricted access.

## **Would it be useful to provide space on an identity card to allow the optional addition of emergency medical information or organ donor details? (Para 2.19)**

There is potentially a serious threat to the invasion of privacy, in this suggestion, at the point of access where the misuse use of personal data might occur. How will this "extra information" be maintained , by whom and how will an individual be able to view what is held about him or her on the card? If medical information were to be held many lives might be saved but information might be used to deny jobs.

## **To what extent would an identity card scheme be seen as a useful way of preventing crime and reducing the fear of certain crimes? (Para 2.26)**

## **To what extent would an identity card scheme be seen as useful to individuals seeking access to public services and of value in reducing the opportunity for fraud? (Para 2.31)**

Identity cards will become the undisputed proof of a citizen's identity. It is inevitable that the criminal community will be able to forge identity cards. The continuing struggle of credit card companies to eliminate fraud is testament to this. Thus a criminal will be able to establish a bogus identity undisputed by many and the very opposite of what the identity card sets out to achieve. There is an implied increase in police powers to stop and search in order to utilise identity cards and an implication that citizens will have to carry such cards at all times. These implied constraints on the individual citizen are unacceptable.

## **Views are invited on the implications for privacy and data protection of an identity card scheme. (Para 3.7)**

The identity card would become the ultimate icon of the citizen in society. Without it, a citizen would be unable to live and work. All the threads of information about the individual would be drawn into one source. There are inherent dangers in this in terms of privacy violations, and restrictions in and surveillance of movement. The issuing and updating processes would be very difficult to secure. It would be difficult to control and monitor access to information. It would be much more difficult to prove an integrity error if all data is held in only one place. It is unclear who owns the personal data. The policing of identity cards regarding data protection would require substantial resources far greater than the levels of resource currently allocated to data protection work.

## **Views are invited on whether there should be a single unique identification number and, if so,**

## **whether it should be incorporated on an identity card. (Para 3.11)**

The danger of a single number linked to an individual is that once it is known it is much easier to access all data relating to that individual. This data set would provide a complete profile of the individual and if it were to fall into the wrong hands could put the individual at risk. Whether such a number should be on the card or not is of secondary importance.

## **Views are invited on the acceptability of an identity card which contained data information about the cardholder in machine readable form and the possibility that this data could be used for biometric checks as a security measure. (Para 3.22)**

The over reliance of this digital icon is concerning. Individuals would not be free to choose whether or not have on identity card. It is unclear as to how data integrity is to be achieved. Who will update information and when will this take place? Biometric tests might be acceptable for the able-bodied citizens but it would disadvantage the disabled citizens because they would have to be singled out for special identity checks which might be stressful and damaging to their confidence.

## **Comments are invited on the lessons to be learnt from the experience in other countries. (Para 4.12)**

Whilst there are many countries that have used identity cards, it is difficult to translate experience across to the UK environment. For example, different cultures, demographics and legislative foundations will all influence attitudes to identity cards. In preparing this response individuals around the world have provided information about the use of identity cards in their countries. The following cases illustrate some of the issues raised.

A response from Denmark pointed out that widespread acceptance of a unique identity number, a central database of personal information for all citizens and a national insurance card was due to Denmark having a written constitution and comprising a small homogeneous population.

In India national identity cards are being introduced to combat voting irregularities in elections. This is aimed at overcoming the lack of adequate systems to administer an activity across a vast and disparate population

The use of identity cards for claiming social benefits was mentioned by several respondents. In Texas, a card is being used for issuing food stamps. The response to this has been positive by recipients. A study carried out in the UK on using a smart card for benefit payments revealed much concern amongst disadvantaged people who feared slum landlords and corrupt employers would demand access to the cards and PIN numbers as a condition of tenancy or employment.

In Iceland, identification is electronically established at birth. The information held is limited and accessible under strict licence. It is not compulsory to carry an identity card and it can be substituted by other forms of identification.

A comment from the US explained that most states required individuals to carry some form of identification at all times and that most law enforcement agencies consider it "probable cause" for arrest if sufficient identification is not available on request.

## **Views are invited on the case for introduction of a separate voluntary identity card/travel card. (Para 5.12)**

This might be acceptable if it was truly voluntary and remained so. It would have to have restricted functionality and safeguards against creeping increases in functionality. In reality it is hard to envisage how such safeguards could be achieved.

## **Would a photographic driving licence make a useful de facto identity card? (Para 5.18)**

This restricts the identity card to adults. It does not cater for minors. How would bans be handled as this would lead to the withdrawal of a driving licence, leaving the individual without an identity card.? Such a scheme would definitely promote the concept of a society of "haves and have nots".

**Views are invited on the case for introducing a dual-function card in particular one serving the purpose of driving licence and identity card. (Para 6.10)**

This appears to serve little purpose. The fundamental question is whether an identity card should be introduced. Functionality is secondary because once the principle is accepted then the functionality will inevitably increase over time.

**Views are invited on the possibility, perhaps in the medium or longer term, of introducing a multi-function Government card which would serve as an identity card and could provide extra convenience to the citizen. (Para 6.18)**

The Green Paper is positive about the benefits to citizens. At a recent conference to debate the Green Paper, the Home Secretary stated that the Government would prefer a compulsory multi-function identity card. Without doubt there is a social cost to bear with the introduction of an identity card and the question must be whether the benefits to be gained make the costs bearable. It seems in many cases the recipients of the benefits are not those who might have to bear the brunt of the social cost.

The bringing together of personal data on one card probably backed up by a central database will make it difficult to ensure data integrity and only authorised access. If a citizen is given the ability to view the data held on him/her then it is likely that others will be able to do a similar thing. This electronic profile of individuals is information rich and needs to be very carefully secured. Failure to do so could jeopardise the well-being of many. This is particularly true of the vulnerable citizens in society.

**Views are invited on the possibility of introducing a compulsory identity card scheme based on either a**

## **simple or multi-purpose identity card and the level of enforcement necessary. (Para 7.16)**

It does not seem right that citizens of a democratic society should be forced to have and to carry an identity card. Such a systems is open to abuse particularly regarding freedom of movement and the right to privacy.

## **Concluding Statement**

It is probably technically and economically prudent to introduce a multi-function identity card but the social cost is too great. The issue of a compulsory or voluntary card is irrelevant because the voluntary identity card would become compulsory by default as citizens would be expected to produce the card in order to receive more and more services. Data integrity and access are huge issues that need to be addressed. As yet little work seems to have been done on this and until there is greater confidence in safeguarding people's privacy, anonymity and freedom the identity card should not be introduced.