

The Entitlement Card – EEMA's view

In July 2002 the UK Government launched a consultation into entitlement cards, which it aims to introduce in order to combat fraud and deliver public services. The six-month consultation period was designed to allow individuals and organisations to express their opinions as to the desirability of the scheme; and to respond to a broad range of associated issues and challenges, both cultural and technical. This article outlines some of the issues raised in EEMA's official response to the UK Government on behalf of its Members in January 2003.

The main issues

To many of our European counterparts, the issue of whether or not to implement an ID card has presented few problems; and this consultation might have been seen as a formality. Indeed ID cards were viewed positively during the Second World War, as a means of protecting citizens against spies. However, there are some serious concerns regarding the introduction of an ID card into the UK. The main ones, cited by groups such as Privacy International and STAND include data protection, and the difficulties of storing such large amounts of personal information securely. Despite these concerns, in a press release issued in December 2002, the UK Government stated that of the 1,500 individual and organisational responses to date, there was a two-to-one split in favour of the plan; and in a poll conducted by the BBC's 'The Morning Show' on January 22 2003 89% of respondents were in favour of the card. EEMA polled its Membership in order to gain a comprehensive view of what the organisation's stance should be, and to formulate its response.

Good news for business and the Government

In general EEMA views the introduction of the card positively. A fraud-resistant, more secure means of identity verification would facilitate the development of both Government and private sector

services. Furthermore, such schemes have been in existence for years in other 'civilised' countries, are compulsory, and yet are not perceived as challenging civil rights. Properly implemented it could act for the greater social good, in terms of,

for example, accessing NHS services, as a more

convenient travel

document than the passport, or as

proof of age. It is

also likely that it would facilitate e-

voting and remote

voting. However, one

of the main benefits

would be in providing

proof of identification for e-

business – an area which simply cannot enjoy its full potential without it. The availability of such an identity card scheme could be combined with payments systems and existing card schemes in such a way as to create an e-commerce revolution.

However, while all of this is good news for business and the Government, it is more difficult to establish the need for the card among private citizens. It is therefore imperative that the messages given out should explain clearly what applications the card can be used for; how it can benefit the individual; and what areas it is likely to be used for in the future.

Voluntary versus mandatory

A social argument for making the scheme mandatory, whereby all lawful residents of the UK over a certain age register with a scheme and obtain a card, is that it would avoid any partial distribution of cards within a particular group, and could

be said to be in the interest of social inclusion. And organisations such as the police, banks and immigration authorities say the card would make their work easier. However, for the sake of a smooth transition, it may be best to start with a dual method of accessing services and entitlements, so that people are not immediately forced into a route they feel uncomfortable with. In the longer term it will be argued that, as the strongest method of identification possible, the compulsory use of such a scheme would prevent fraud and ensure that scarce resources are more fairly allocated amongst the people who need them most. This is certainly the view of Home Secretary David Blunkett, who has stated that until the Entitlement Card is introduced, there can be no robust way of determining true identity or right to work.

Distribution

The Government has suggested that service providers might be free to decide whether or not to use the card scheme as a means to access their services; service providers who did choose to use the card scheme would make the scheme the exclusive way to access their services; and some services would rely on the database which administered the card scheme rather than require the production of a card if that was a more efficient and convenient way to provide the service. Clearly, if such is the case, attention must be paid to the distribution of cards and ease of access to cards for all citizens, including those with disabilities and the housebound. Furthermore, service providers should be left to decide how access is provided to commercial and other services on the basis of need and commercial viability, incorporating risk assessment and management.

Legislation

Any legislation should be flexible enough to allow a full variety of technical implementations to be

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considered. It should not specify or exclude specific technologies such as biometrics, but simply provide the legal environment for such a scheme to exist at a high level. This is not the case when it comes to cost and access to the database. Both citizens and potential service providers would be more comfortable if legislation were specific about access to the database of cardholders, including rights of access and charges.

Technology

When considering automation, it is always beneficial to have a unique identifier for a specific data record. This might not necessarily be numeric, it could be alpha-numeric, and might incorporate some structure which could enable card holders to be grouped, eg families. Another element of the identifier could provide an immediate link to existing data sets eg National Insurance Number or NHS number. If the card were 'self-contained' rather than requiring access to a remote database, it would facilitate card use and would probably be more acceptable to individuals.

Meta level definition

Passport and driving licence are examples of valid applications for an entitlement card. In the short term it might be appropriate to test different applications on different cards. Multiple cards would, however, be undesirable in the long term as they

lead to confusion, technological diversity and competing infrastructures. Any card should therefore be defined at a meta-level to incorporate a wide variety of other potential applications. Here the issue of common architecture and interoperability between different schemes must be a prime concern to allow for scalability and possible future linkage.

The database

If more secure passports and driving licences were issued based around a common identity database shared between the UK Passport Service and the DVLA, it is important that its proper use should be as widespread as possible to maximise the value of such an asset. This would include at least all Government departments and might also include selected commercial organisations. However, the Government should not rely on commercial organisations such as credit reference agencies to create and maintain key data sets. Credit reference agency data could incorporate flaws due to the principles used to build and hold the data. Rather, the Government should be providing the base data from which organisations such as credit reference agencies provide their services to others.

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Incorporating biometrics

The appropriateness of incorporating biometric information into the card is debateable. The three most likely options are fingerprints, iris patterns and facial recognition, and due consideration must be given to the cost of each option as well as the technical feasibility of high quality results. Fingerprinting has been favoured by a number of other European initiatives. If biometrics are used, then biometric recording devices should be located in public but supervised locations such as Post Offices. Mobile units could offer the service to sparsely-populated areas.

Smart cards

Issuing an entitlement card as a smart card would enable more information to be held as well as on-card software applications, and would be of great benefit, especially in terms of sharing information between organisations. Furthermore, it would be entirely feasible and desirable for an entitlement card to include a digital certificate; and the cost implication would be low in comparison to other applications.

Conclusion

EEMA is in favour of the scheme, not just for defensive, preventative reasons, but as a positive enabler of business, government and individual communication and service provision, both at a national and international level. Clearly there are some social and technical concerns to be overcome; and the robustness, security, scalability and interoperability of all elements of the system cannot be left to chance. Indeed, there is much work to be done before the UK Entitlement Card can be launched, and EEMA and a number of its Member organisations look forward to collaborating with the Government in this vital area of identity management. ■

