

## Comments on Consultation Questions

Question	Comments
<p>P1 The Government invites views on the principle of establishing an entitlement card scheme as a more efficient and convenient way of providing services, tackling illegal immigration and illegal working and combating identity fraud.</p>	
<p>P2 Should the Government give consideration to one or more targeted entitlement card schemes and if so what sort of schemes should be considered?</p>	<p>P2 On balance a link between this type of entitlement card and the new style passport and driving licence would make it more understandable, with a non driving licence card in the same style the best option.</p>
<p>P3 Views are invited on whether the Government should implement a voluntary entitlement card scheme.</p>	
<p>P4 Views are invited on whether the Government should implement a universal entitlement card scheme where:</p> <ul style="list-style-type: none"> <li>(i) it would be a requirement that all lawful residents of the UK over a certain age register with a scheme and obtain a card;</li> <li>(ii) service providers would be free to decide whether or not to use the card scheme as the means to access their services;</li> <li>(iii) service providers who did choose to use the card scheme would make the scheme the exclusive way to access their services (with exceptions for emergencies such as lost or stolen cards);</li> <li>(iv) some services would rely on the database which administered the card scheme rather than require production of a card if that was a</li> </ul>	<p>P4 If a scheme was introduced, it would seem most sensible for it to be a universal card and not selected areas. The exclusive use of a card as the only way to access services would be administratively easier but would cause problems for applicants especially if there was a charge for the card.</p>

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<p>more efficient and convenient way to provide the service.</p>	
<p>P5 Views are invited on what the contents and scope should be of any legislation to implement an entitlement card scheme.</p>	<p>P5 Would be preferable to implement requirements for adopting the card for particular services once the card was in established use. However it is done, it needs to be ensured that all related services eg Benefit legislation, whether run by Job Centre Plus or local authority, should be done at the same time.</p>
<p>P6 Views are invited on what powers the Government should have to require cards to be held in any universal scheme and what incentives and sanctions there could be to help ensure universal coverage.</p>	
<p>P7 Views are invited on whether any entitlement card scheme should allocate a unique personal number to each card holder, what form any number should take and whether it should be incorporated onto the card itself.</p>	<p>P7 It would seem that a Personal Identification Number would be necessary for the system but not wholly necessary for the local authority requirements for the issue of HB entitlement, blue badges and Education Welfare Benefits. The local authority can make use of National Insurance Numbers and dates of birth for additional verification in many areas. The need for cross-referencing against other systems has proved invaluable in the fight against fraud in Wirral. Housing Benefits has been involved in this and would support ongoing ability to cross-reference.</p> <p>The holding of National Insurance Numbers would make this an easier starting option to cross-reference with, but not all services which could use the entitlement card hold the NI number and the general use of the number has been frowned on by the Information Commissioner. A unique number could also be used by telephone or other non-personal contact but this would need additional verification checks.</p> <p>There would be a cost issue, for systems</p>

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	changes to include an additional field, if the new entitlement card number was not a number held on systems already.
<p>P8 Views are invited on the development of a national population register which could be used in a sophisticated way across the public sector with the aims of improving customer service and efficiency.</p>	<p>P8 Such a card would assist in customer service and service efficiency for the areas we deal with. This would support the joining up of service delivery and the e-Government Agenda.</p>
<p>P9 Views are welcomed on whether an entitlement card scheme would allow for more efficient and effective delivery of Government services and what services people would most like to see linked to a card scheme.</p>	<p>P9 Council services could utilise the existence of such a card for proof of identity purposes. It is time consuming for both us and service users to request proof of identity, with birth certificates being seen as the main source document, which people sometimes have difficulty in presenting. Thus such a card would be a positive change. The Government Gateway could be used to access the database for better electronic and assisted service delivery.</p>
<p>P10 Views are also welcomed from organisations providing services in the public and private sectors on whether they would like to link their services to a card scheme and what features they would want to see in a card scheme that would most benefit their services.</p>	
<p>P11 Views are sought on whether an entitlement card scheme would be a cost effective additional measure against identity fraud and related criminal activities such as money laundering.</p>	<p>P11 This would clearly help address ongoing fraud, although identity fraud is not the biggest area of fraud we have to address.</p>
<p>P12 The views of employers, trade unions and other interested parties are sought on whether an entitlement card scheme would be an effective measure (as part of a wider package) to combat illegal working and illegal immigration and what</p>	<p>P12 We have not experienced significant problems as an employer with illegal working.</p>

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<p>suggestions they might have for how a scheme could be designed to minimise administrative burdens on employers.</p>	
<p>P13 Views are sought on whether an entitlement card should be available to UK citizens in a form which allowed it to be used as a more convenient travel document to Europe than the passport book.</p>	
<p>P14 Views are sought on whether an entitlement card would be an effective proof of age card, whether there should be a minimum age at which entitlement cards should be available and if so what that age might be.</p>	<p>P14 The card would be useful in verifying information such as age for purchasing alcohol, cigarettes etc.</p>
<p>P15 Views are sought on:</p> <ul style="list-style-type: none"> <li>(i) whether an entitlement card scheme would be effective in reducing crimes other than those related to identity fraud;</li> <li>(ii) whether an entitlement card scheme would reduce administrative burdens on the police;</li> <li>(iii) whether the police, the intelligence services and other organisations investigating very serious crimes such as HM Customs &amp; Excise should have access to the central register – including biometric information – in closely prescribed circumstances in cases where they are investigating matters of national security or very serious crimes and what those safeguards should be.</li> </ul>	<p>■</p>
<p>P16 Views are invited on whether an entitlement card scheme would benefit the maintenance of the electoral register and facilitate new ways of voting.</p>	<p>■ P16 Real benefits will only be realised if technology and legislation are updated appropriately to allow for the introduction of identity cards. Pilot schemes are</p>

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	presently being carried out into alternative electoral arrangements and the issue of entitlement cards must be considered when the time comes to finalise the evaluation and decide the way forward.
<p>P17 Views are sought on:</p> <ul style="list-style-type: none"> <li>(i) whether an entitlement card should display emergency medical information and/or act as an organ donor card at the card holder's consent?</li> <li>(ii) if so, what sort of emergency medical information would be most useful to display?</li> <li>(iii) given space constraints on the card, whether storing emergency medical information on a smartcard chip on an entitlement card would be useful?</li> </ul>	<p>P17 We have encouraged staff and citizens to register for organ donor schemes.</p>

<p>P18 The Government invites views on the early steps it would like to take to tackle identity fraud and welcomes expressions of interest from the private sector to collaborate in this work.</p>	
<p>P19 Views are invited on whether checks on applications for passports and driving licences should be strengthened to the degree outlined in Chapter 5 whether or not the Government decided to proceed with an entitlement card scheme based around these documents.</p>	
<p>P20 If more secure passports and driving licences were issued based around a common identity database shared between the UK Passport Service and the DVLA, the Government invites views on:</p> <ul style="list-style-type: none"> <li>(i) whether it should take the necessary legislative powers to allow other departments to access this identity database to allow them to make their own</li> </ul>	

<p>checks;  (ii) whether it should allow the private sector to access the identity database provided this was done with the informed consent of subjects.</p>	
<p>P21  Views are sought on whether the Government should procure a service from the private sector which checked applications for services against a number of databases used by the credit reference agencies or similar organisations and selected biographical data held by the Government.</p>	
<p>P22  Views are invited on whether a summary-only offence of identity fraud should be created.</p>	
<p>P23  Comments are invited on whether any entitlement card scheme should be based around a passport card and the photo-driving licence (including a non-driving licence/entitlement card). In particular, comments are invited on whether having a family of cards rather than a single card would be helpful or confusing. Suggestions of other models for an entitlement card scheme are also invited.</p>	
<p>P24  Views are sought on whether young people should be invited to apply for an entitlement card when they are issued with a National Insurance number.</p>	<p>P24  Entitlement cards would need to be considered from 16 years old, if a system was to have maximum effect as this is when eligibility for HB starts and people can buy certain products such as cigarettes.</p>
<p>P25  The Government is particularly keen to hear young people's views on what features they would like to see on an entitlement card which would make it attractive to them.</p>	

<p>P26 The Government invites comments on its suggestions for how entitlement cards could be issued to various categories of foreign nationals. The Government is particularly keen to ensure that any entitlement card scheme would not make the UK a less attractive place for foreign nationals to work and settle lawfully and welcomes specific suggestions on how to ensure this.</p>	
<p>P27 Views are invited on whether more background biographical checks than currently take place should be conducted before applicants were issued with entitlement cards and whether the checks suggested in this paper are useful, feasible and proportionate.</p>	
<p>P28 (i) Comments are invited on whether an entitlement card scheme should include the recording of biometric information with particular regard to the cost, feasibility and acceptability of the three most likely options (fingerprints, iris patterns and facial recognition).  (ii) The Government would like to hear the views of potential partners on how a nation-wide network of easily accessible biometric recording devices could be established and operated, how people who are not mobile or who live in sparsely populated areas could be served and what other value added services potential partners might offer.</p>	
<p>P29 Views are sought on what benefits issuing an entitlement card as a smartcard would bring to card holders,</p>	<p>P29 A standard smartcard which could be used by a number of organisations or parties would resolve the costs issue</p>

<p>whether the use of a smartcard chip could be shared by a number of organisations effectively and whether any potential partners would be interested in managing the sharing of a chip on behalf of the Government.</p>	<p>currently encountered.</p> <p>Merseytravel has already approached Merseyside Authorities about possibly partnering in a smartcard scheme.</p>
<p>P30</p> <p>Views are invited on the different ways which a card system could be used to help validate face-to-face, post, telephone and on-line transactions. In particular views are sought:</p> <ul style="list-style-type: none"> <li>(i) from service providers on whether an authentication service based on a card scheme would be useful;</li> <li>(ii) from potential partners who might provide the authentication service on a commercial basis to help off-set some of the costs of the scheme to Government;</li> <li>(iii) on the longer-term use of biometric information should this form part of any scheme.</li> </ul>	<p>P30</p> <p>An authentication service would be necessary where any doubt needed to be addressed or confirmation was needed. This could be by phone with appropriate authorisation protocols in place, as we use already with a number of bodies and agencies, or by secure on-line contact.</p>
<p>P31</p> <p>Views are invited on whether it would be feasible in business and technical terms for an entitlement card to include a digital certificate and what the implications for the cost of the card would be.</p>	<p>P31</p> <p>There is an ongoing debate as to how we can accept digital signatures and this could be helped by using, as is suggested, some form of “chip” to assist as an authorisation medium for Internet transactions, which clearly we are moving more towards as we move to direct service availability.</p>
<p>P32</p> <p>Views are welcomed on what information should be held in any central register which might be used to administer a card scheme and what information should be displayed or stored on the card.</p>	<p>P32</p> <p>The core data for the scheme should be minimal – just enough to cope with secure identification and authentication.</p>



<p>P33 The Government is very keen to consider suggestions from people whose circumstances might make it difficult for them to participate in a scheme and from organisations representing them on how a scheme can be designed to accommodate their needs.</p>	
<p>P34 Comments are invited on the indicative costs outlined in this section, in particular on the compliance costs which employers might incur in using a card to check the employment status of new employees.</p>	<p>P34 We need to know the actual figures when they are available. Each service proposing to use the scheme will be subject to a cost benefit analysis.</p>
<p>P35 Views are invited on what specific measures should be included in any entitlement card scheme to ensure compatibility with the principles of the Data Protection Act 1998.</p>	