

Sent: 30 January 2006 21:33
To: Watmore Ian - PMDU -
Subject: Transformational government strategy

Dear Sir:

While I see encouraging phrases and ideas in this paper, there are major deficiencies that concern me.

Within Identity Management, the notion of "an holistic approach" to providing mechanisms so that I can identify myself to a variety of public and private agencies has merit. The idea that this "will converge towards biometric identity cards and the National Identity Register" I find chilling.

Identity has many different layers, from, fairly general and unobtrusive ones such as "I live at this address" to specific and obtrusive ones - this is my fingerprint, my retina scan, my credit card transactions for the past year, my DNA. While I am willing to provide general access to the unobtrusive layers of my identity, I feel threatened if an agency has access to a register that contains a great deal more about me than is necessary for that agency to know.

The concentration on biometric identity cards is deeply flawed for practical reasons as well.

Large scale IT projects are difficult at the best of times. Unless it is clear at the outset what is required, by whom and when, the project is doomed to failure. The IT infrastructure required for the large scale introduction of identity cards will be massive. There are almost certain to be hidden difficulties with scalability (i.e. small scale test projects may mislead and provide a false sense of security of what can be accomplished). There are also many security issues that need resolving, for example: How is data transmitted securely between a biometric scanner and the National Identity Register? How well protected are the databases that store the Register information? How susceptible are the operators and entry clerks of the Register to bribes, threats and penetration from criminals?

What biometrics are gathered? How often do these cards need to be updated? What level of accuracy, both in terms of false positives and false negatives is acceptable? Is the current generation of scanning technology able to meet the accuracy requirements in a cost effective and time effective manner? How are disabled people catered for? What is the position of such cards for children?

As you are no doubt aware, the list of such questions is very long. Solutions can be found, but it is not clear whether these solutions would be timely or cost effective.

Biometric identity cards do not deal with one critical identity problem - the need to establish identity over the telephone or Internet. I think attacking the problem of remote identification or authorisation would be a better use tax payer money than an overly centralised and overly intrusive introduction of a National Identity Register and biometric identity cards.

Yours faithfully,

Clifford Addison