

Sent: 30 January 2006 16:36
To: IT Strategy Project Team
Subject: Response to strategy document "Transformational Government:
Enabled by Technology".

Dear Mr. Watmore,

I am writing in response to your strategy document "Transformational Government: Enabled by Technology".

Although there is much to commend about many parts of this proposal, I have serious concerns about the aspects of the proposal involving the introduction of identity cards, particularly section 39.1

"Identity

Management", which states:

> Identity Management: Government will create an holistic approach to
> solutions that enable the public and private sectors to manage risk
>and provide cost-effective services trusted by customers and
>stakeholders. These will rationalise electronic gateways and citizen
>and business record numbers. They will converge towards biometric
>identity cards and the National Identity Register. This approach
>will also consider the practical and legal issues of making wider
>use of the national insurance number to index citizen records as a
>transition path towards an identity card.

I am strongly opposed to the introduction of biometric identity cards for the following reasons:

Firstly, ID cards are a threat to civil liberties, and will have a chilling effect on civil society. The introduction of ID cards would be a profoundly illiberal measure. This of itself should be sufficient reason to reject these proposals.

Secondly, if introduced, ID cards would be ineffective at preventing crime, fraud or terrorism. There is no evidence that any of the recent terrorist crimes would have been prevented by ID cards. Indeed, it is likely that criminals will use forged ID cards to increase the ease of identity theft, since there is no such thing as an unforgeable document or an unsubvertable database, and ID cards provide a single point of failure for identity management. (It may be relevant that it was reported yesterday that the security of the Dutch biometric passport scheme, a system very close to the proposed British ID card scheme, has been cracked.)

Thirdly, the infrastructure to support biometric identity cards throughout government would cost billions. Unfortunately it is not possible to fully estimate the cost of ID cards since the government has kept the basis of its own estimates secret -- which in itself sets a new and disturbing precedent for a civilian government project -- but independent estimates suggest that the overall cost of the introduction of ID cards and their related infrastructure may exceed ten billion pounds. This is money which could be better spent on schools, public health, or the defence of the nation -- or simply handed back to taxpayers, if the government has no better use for it.

Finally, the practical problems of introducing such a system have not been properly considered; since the United Kingdom would be the first country to introduce a system of biometric identification cards, and given that the infrastructure needed would have to pervade both government systems and society at large, the project to implement them will have a high probability of failure.

These are not just my opinions. ID cards have met with widespread criticism from sources as diverse as the London School of Economics and Stella Rimington, the former head of MI5. They are opposed by civil liberties groups, both main opposition parties, and by many Labour backbenchers. Recent votes in the House of Lords have demonstrated its opposition to the introduction of ID cards.

Yesterday, Lord Carlisle, the government's own reviewer of anti-terrorism measures, announced his own change of heart regarding ID cards. He has now stated that he opposes ID cards, which he formerly supported, citing their ineffectiveness against terrorism and Parliament's concerns about civil liberties.*//*

Given such widespread opposition, and such serious flaws in the proposed scheme, it is hard to see how the introduction of ID cards can logically continue to be supported when its drawbacks so greatly outweigh any potential benefits. The government itself, by its continual changes in its rationale for the introduction of ID cards, appears to be uncertain why it is advocating them.

I hope you can appreciate from the above why I consider that the peacetime introduction of ID cards would be a mistake. I urge you to reconsider, and to abandon the plans for use of biometric identity cards.

Yours sincerely,

Neil Harris