



**Report of the EURIM Personal Identity Subgroup meeting, 9 March 2005,  
1000 – 1200 Committee Room 19, Westminster Palace**

Chairman: Jim Lound (Experian)  
Rapporteur: Dave Wright (EURIM)

***SUMMARY OF MAIN POINTS***

1. The Personal Identity Group, in response to a request from EURIM Council, will form a subgroup to address issues of concern around personal identity in the ID Card Bill. A major aim will be to prepare briefing material for the new intake of MPs after the General Election.  
The subgroup should identify:
  - the current state of legislative proposals relating to personal identity;
  - the current state of implementation plans;
  - the various lobbyists, their positions and websites;
  - possible actions that may extend the functionality of ID cards while enhancing security.
2. An opportunity has arisen to apply and test the 'circle of trust' data sharing model within the education sector. At a meeting scheduled for 24 March between Experian, an educational consultant and representatives from IMIS and the University of Greenwich, it is intended to establish a pilot project that will manage information related to professional and educational qualifications, using a trusted intermediary to control data access.
3. Progress on the EURIM process map will continue with the Department of Constitutional Affairs maintaining a 'watching brief' while their resources are focused on freedom of information issues. The scale of DCA's future involvement will depend on resources.
4. The PI Subgroup presented its draft briefing on the benefits of data sharing for eGU. The aim is a brief and punchy paper, with recommendations for practical 'quick wins'. Data sharing is used to good effect in some areas, but the scale of successes must be expanded dramatically if Government targets for transforming service delivery and reducing fraud are to be met.
5. EURIM will assemble and maintain a web-hosted draft working grid to list the current proliferation of initiatives on identity management. The grid will be modeled on the successful EURIM e-Crime grids, which perform a useful role as a resource with the proviso that they are draft working documents, and not authoritative in any way, being constantly updated by users.
6. Current security routines do not relate to human behaviour, because the format and sheer volume of the passwords and PIN numbers etc leads to confusion. It raises the question of how ordinary human beings can handle complex numbers and passwords, other than by writing down and negating most of theoretical security. Research is needed to establish guidelines and best practice, and it was agreed to draft a short paper on human-friendly identifiers.
7. An exercise to check the accuracy of name and address data in the public domain organised by EURIM has revealed some 38% of properties in the study area are not on the electoral register, in addition to a number of inconsistencies in commonly-used address files. The results will inform any calls for action with regard to the rationalisation of current initiatives after the election.
8. A workshop has been organized on 23 March to look at public sector security routines, professional guidance and good practice in Government's dealing with citizens and business.

## **1. Introduction**

1.1 The purpose of the meeting was to address concerns about the Group's focus in the context of personal identity issues and the Identity Cards Bill, to receive a report and draft paper for the eGU from the PI subgroup, to review progress and plan forward actions.

## **2. Focus and priorities of the Group – personal ID and the ID Cards Bill**

2.1 EURIM Council had requested that this group use the election period to take a look at the various agendas behind ID Cards Bill. The Bill was sent from the Commons on 21st February 2005; its second reading is currently programmed for the House of Lords on Monday 21st March, by which time it will be getting dangerously close to the election period.

The Government's difficulties in pushing control orders through Parliament are making it look increasingly unlikely that the ID Cards Bill will make it onto the statute book before the election. The momentum is such that the Bill will almost certainly be reintroduced, but the form it takes and the subsequent implementation plans will depend on the colour of the next Government, and the size of its majority.

2.2 Before the last EURIM Council meeting, PI Group policy was to focus on those personal ID issues where EURIM could make a difference, and leave ID cards to one side until the issue emerged from the parliamentary process, when we could consider what contribution we could make using a non-partisan approach. However, the EURIM Council expressed concern that the PI Group was not addressing the most important issue, the ID Card Bill. There were concerns that its focus was narrowing and the opportunity was being lost to address the wider issues of Personal Identity, and that we should at least prepare briefing material to put it into broader context for the new intake of MPs.

2.3 The House of Commons Library brief produced in November 2004 was extremely good, but a number of issues had emerged in subsequent debate. There is evidence that citizen's wish to use fewer identities in their dealings with Government to avoid giving their details repeatedly. Many also fear carrying a single high value identity credential in case it is lost or stolen. Evidence from MPs' postbags also suggests that many people will resist being compelled to use online transactions because local post offices and bank branches are being shut down, thus limiting their choice and convenience. Other issues include inaccuracies in the electoral register, fraud, ID theft, technology downtime leading to interrupted service delivery, forgetting passwords, PIN numbers etc.

2.4 The initial suggestion was for the current PI group work programme to continue, but also to consider establishing a new subgroup tasked to prepare briefing material for the new intake of MPs that will include issues of concern thrown up in debate that are not already being covered in other material from other sources. The subgroup should identify:

- the current state of legislative proposals relating to personal identity;
- the current state of implementation plans (in the context of the political dynamics, and what is planned compared with what is *enabled* by the legislation);
- the various lobbyists, their positions and websites;
- possible actions beyond a simple briefing on the state of debate; including resetting agendas.

2.5 Some of the work might be taken up by the House of Commons Library, and they may wish to enlist subgroup personnel to help them research and deliver a balanced brief. Members should also consider their own preferred actions for when the ID Cards Bill is returned to Parliament after the election. Interestingly, in his address to the Foundation for Science and Technology Ian Watmore had identified pressures for convergence of identities. If so some of the provisions of the Bill, e.g. penalties for falsifying records, would need to be more widely applied.

2.6 It is intended that the proposed EURIM briefing would be the *first* document, if not necessarily the preferred one, available to the new intake of MPs, unless HoCL decided to update their excellent brief before the summer recess or the Home Office or others had plans to produce updated material..

2.7 Given the mass of comment and analysis that already exists, the task of the subgroup would be to identify which of the emerging issues of concern are not being well covered elsewhere. If it was decided that there were no new areas for concern, the subgroup would be able to simply list the websites where the issues were covered, and disband.

2.8 It was noted that the draft paper drawn up by the EURIM PI subgroup for the eGU contained no reference to ID cards. This is because the detail of implementing the provisions of the ID Cards Bill lies in the secondary legislation – the Bill itself is simply an enabling tool. The concerns about a central database can be traced to this situation. If Labour is returned to Government with a sizeable majority, it is expected that the returning Bill will be largely the same, and any changes will be in implementation plans. Significant changes might be expected if Labour has a small or no overall majority, or if the Conservatives gain power. The election period provides a window of opportunity to produce a meaningful draft that outlines current plans and identifies and comments on emerging issues that have not already been covered elsewhere.

2.9 An important issue is the provision of checks and balances in the system; this was being debated in the anti-terrorism legislation in the House of Lords, where proposals were under challenge to ensure that power was not vested entirely in the executive without provision for an independent check. One of the changes to the draft ID Cards Bill was the expansion of the role of the independent National Identity Scheme Commissioner, but this may not address all concerns. Information held centrally is not restricted to the Secretary of State or an agency – bodies that can demand to see the ID card locally are not included in a supervisory regime. EURIM may be able to offer practical help in filling this gap, although this had been addressed to some extent.

2.10 A major task for the subgroup should be to identify which high-level principles have been debated and how they have fared in the context of the legislation. For example, would the card be purely a Government tool, or used within a mixed economy model as (at least formerly) advocated by eGU, potentially as part of the economic infrastructure of UK plc? Standards would be important in establishing transparency and attracting investment.

2.11 A regulatory impact assessment would be difficult to undertake in the absence of an official statement of what is planned, as opposed to what is enabled, because it would need to be aligned to actual implementation plans. Industry is nervous due to a lack of transparency and confidence in future planning. Cost is also a key issue – what will a department charge for identity checks?

2.12 Much information has been published from different viewpoints, and much has emerged as the result of evidence given to parliamentary committees. Some of the work to be done has consequently been clarified – e.g. ID checks will be made online, so that a card is read locally and checked online against a central database. However, this provokes a range of questions around the security etc. of the methodology, that the subgroup might wish to address.

**2.13 It was agreed that a subgroup be established to address issues of concern around the Identity Cards Bill;** members would be invited to volunteer for after the meeting.

### **3. Reports of Group workstreams**

3.1 Three workstreams are currently active in the Personal Identity Group.

#### Circle of Trust

3.2 An objective defined in the EURIM status report ‘Citizen or subject – how far do we control our own identities?’ published in July 2004, was to take forward a practical example of the ‘circle of trust’ model. An opportunity within the education sector, and a project that focuses on managing information related to professional and educational qualifications, is now in progress. A meeting is scheduled for 24 March between Experian, an educational consultant and representatives from IMIS and the University of Greenwich.

3.3 Elements of the model comprise the individual who owns the CV, and service providers (e.g. potential employers), who wish to access that information. A trusted intermediary is required to control access to the data, and perhaps store some of the information. The data providers would include examination boards, universities and professional bodies.

3.4 The sector skills council for criminal justice (Skills for Justice) had shown most interest in the project because of the need to validate the CVs of those applying for many posts in the criminal justice system. Research has shown that some 70% of “skills passports” and CVs contain ‘exaggerations’, while around 30% contain potentially serious inaccuracies or omissions. Rigorous validation will therefore be imposed on the circle of trust routine to allow tracking of the accuracy and quality of the data held. Consequently, an issue at the outset is the provision of a fully costed business model, before the technology is considered.

3.5 The Personal Identity Subgroup has concluded that two approaches to data sharing in the education sector are possible, one being the circle of trust model, the other being the federated model. EURIM is not taking a view either way, but we now have the opportunity to receive feedback from an exercise that will test the practical application of one of the models within a challenging environment. We would similarly welcome feedback from exercises using alternative models

3.6 However, EURIM should be quite clear in describing the different approaches to data sharing, and avoid confusion over terminology. It was therefore agreed that **EURIM would consider drafting a short paper explaining the different approaches, the names they are known by, and the distinctions between them, because the same words have been used to describe very different models**. It was further agreed that whatever the name of the model, the key issue is the level of *trust* between the different parties in any transaction that involves data sharing.

#### Risk assessment

3.7 Little progress had been made, largely because of the lack of live data - most organisations considered it too sensitive to share. Support hoped for from DfES projects following on from the Richard Inquiry had not materialised because they were reluctant to offer a view of their risks.

3.8 It was reported that most people recognised that a risk assessment exercise will require a great deal of effort. Although the informal support of the Office of the Information Commissioner (OIC) is available, progress seems to hinge on being able to use real data. It would be difficult to add value by doing a generic study – i.e. without focusing on specific project issues, so perhaps a first step now should be an analysis of the different risk types. However, a useful way forward might be to consider the methodologies used in a risk assessment exercise.

3.9 While there was a good deal of talk about risk assessment, at the Euromoney Secure IT forum in November 2004, players rarely went beyond a ‘tick-box’ exercise; there was little in the way of actual assessment or prioritisation. The Skills for Justice programme had found that nowhere in the current information systems, skills definitions or structures was provision made for competence assessment or training on risk assessment. Except for the civil engineering context, talk is not being translated into real exercises, and the actual techniques that organisations use are not shared. There is little prospect of being able to find and use current live data.

3.10 Experience with operational risk in the finance and insurance sectors had shown that each institution had its own methodology. A generic approach was therefore not feasible, especially when the Government environment and the processes to be assessed are unknown. It was agreed that we **ask a volunteer to define the steps and objectives in risk assessment**. This might be used to gain feedback; past data could perhaps then be obtained and used for educational and training purposes.

3.11 John Walker, who has just agreed to be vice-chair of the EURIM e-Crime group on Reducing Vulnerabilities, now chairs the BS7799 Group within DTI. This might generate points of contact.

#### Data sharing process map

3.12 Feedback from OIC is included in the latest draft of the process map (please see attached). A EURIM subgroup met with DCA officials in December, and a collaborative approach was agreed, but since then DCA had had to concentrate its resources on FoI issues. This would continue until June 2005 at least, but DCA is keen to keep a ‘watching brief’ on data protection and data sharing issues. **In June, DCA will put forward evidence-based proposals to ministers on what they consider to be the best way forward**. The scale of DCA’s involvement will then depend on resources.

3.13 In the meantime, EURIM would like to take this forward, focusing on Local Authorities as the practitioners. The intention is to expand the number of applicable process flows while identifying through feedback the working practices and exceptions that local authorities have experience of. The objective is that the process flow will form the basis of an interactive website to allow practitioners to follow the steps involved in order to reach a confident decision on whether or not they can share data. There is a lot more work to do, especially with respect to incorporating the exceptions – DCA might be able to help in pointing towards a likely source for such information.

3.14 The process map accommodates statutory obligations early in the ‘flow’, thus avoiding complications. Although it appears complex on paper, in the online environment the web page design splitting the questions into different pages should simplify the procedure and make it user friendly. **DCA would attend a meeting with FAME in the next 2 weeks, and would report any feedback**.

3.15 A meeting is scheduled for 14 March organised by StorageTek on the storage and retention of data and access; delegates include chief information officers from across Europe. The updated version of process map will be used to illustrate the EURIM approach, because the same issues apply in principle if not in detail to all under the EU data protection directive. **Any feedback would be reported from the institutions represented** (mostly from the financial sector, looking at data retention in the context of Basel II and other requirements, including data protection).

#### **4. Subgroup report**

4.1 A number of hard copies of the draft report were tabled, but there was no intention for close, line-by-line scrutiny. Instead, a digital copy would be circulated with the report of this meeting, and feedback would be welcome (please see attached document). The aim was to be brief and punchy, with recommendations for practical 'quick wins'.

4.2 The paper points out that data sharing is already used to good effect in some areas, but the scale of successes must be expanded dramatically if Government targets for transforming service delivery and reducing fraud are to be met. The rapid and assured corroboration of identity credentials (without actually revealing personal details) was a particular concern.

4.3 The issues of identity fraud and theft are covered, with examples that attempt to quantify the problems, and the scale of benefits that might be achieved by using data sharing solutions. Other relevant facts and figures illustrating the potential benefits, and the financial, policy and social implications of *not* data sharing, will be listed in a draft appendix. Estimates of the cost of fraud run into hundreds of millions of pounds.

4.4 Differences between the financial services and federated models are described, but we need to be clear about terminology. There may be a call to include the role of the ID card, perhaps in an appendix, but the main aim of the paper is to offer opportunities for quick wins. **The meeting agreed that the draft paper should be circulated for feedback with the meeting report when ready.**

#### **5. Identity grid**

5.1 It was proposed that EURIM consider drawing up a grid of identity management initiatives. eGU undertook an exercise in March 2004 to collect information on data sharing but had not published it widely; they are currently looking at the various identity initiatives, but there is no plan for a formal study. The current proliferation of initiatives and the absence of any plans by eGU to publish would make it particularly valuable, provided someone is willing to start the ball rolling with an initial draft.

5.2 The two current EURIM e-Crime grids were established because both Home Office and the NHTCU found them useful, but had no wish for political reasons to operate and maintain a grid themselves. The grids performed a useful role as a resource but with the proviso that they were draft working documents, not authoritative in any way, and constantly being updated by users. The grid was useful in alerting users to other schemes that they might have been unaware of, and in preventing unnecessary duplication of initiatives.

5.3 **It was agreed to establish and circulate a grid for population by members;** we could then decide how to take this forward. Identifying, listing and tracking the expanding number of initiatives would be a time-consuming task, requiring regular checking of URLs, as these frequently tended to fall out of use. ODPM is running 22 national projects, and it is not clear which have personal identity at their core. Some counties operate dozens of identity card schemes. Listing aggregations of schemes might be most effective, as it would be practically impossible to list them all, even if they were known.

5.4 The aim would be to post the grid as a draft working document on the EURIM website (as a neutral site) for continual updating and to track successful models. Information would be forwarded from the eGU exercise to start the process. The sheer volume of initiatives suggested that starting a website-based grid would be beneficial. A list of LA schemes may be found on the National Smart Card project website; this could form the basis for establishing best practice and common standards (try: <http://www.nationalsmartcardproject.org.uk/schemes2.php?region=0&service=0>). Any grid should include the Government Gateway – a source of much practical information.

#### **6. Psychology of passwords**

6.1 This issue had arisen during the Foundation for Science and Technology meeting on 23 February, when Ian Watmore described how the memorable format of the old ID Card/NHS numbers was replaced by numbers that are not easily retained. It raised the question of how ordinary human

beings handle complex numbers and passwords, other than by writing down and negating most of theoretical security, a situation not helped where regular changing of passwords is required.

6.2 The topic appears to be neglected, other than by security experts who say that everyone should follow 'the rules' but the design of systems almost inevitably means that most users will break those rules. Security does not relate to human behaviour, because the format and sheer volume of the passwords and PIN numbers etc leads to confusion. Participants related several anecdotes in support of this view that research is needed to establish guidelines and best practice

6.3 It was argued that this should be a task for research councils rather than EURIM, because academics and social scientists had already done this research, and should have data available. However, available evidence suggests that such information is not being harvested and used, though we could perhaps approach academics to ensure the right questions are asked. **It was agreed to draft a short paper on human-friendly identifiers.**

## **7. Residential churn – Val Beech study**

7.1 Many personal identity initiatives assume accurate information on address as well as name. However, annual residential churn rates range from under 4% (in some suburban and rural areas) to over 400% per annum (in some inner city areas) and a significant proportion of the population has multiple residential addresses or none. EURIM has therefore organised a modest exercise to compare and contrast the various sources of information as to who inhabits which addresses in a supposedly average polling district (chosen because the researcher is organising the door-to-door canvas).

7.2 The area was chosen because the houses in the area have been in occupation for a long time, so that problems cannot be attributed to new developments. A postal address file (PAF) was made available for comparison with the electoral register. Early results are interesting (see attached document 'Residency Analysis): some 38% of the properties are not on the electoral register, and there are many inconsistencies in the records. The results will inform any calls for action with regard to the rationalisation of current initiatives after the election.

7.3 Although the national census listed names and addresses, it represented only a snapshot in time, and did not reflect the dynamics of a mobile population; some local authorities might have a vested interest in an inaccurate register if it gained them revenue. It was noted that the purpose of the electoral register is to list those people eligible to vote: its function was not to list all addresses. However, the exercise highlighted issues for identification and verification. Where identification and authorisation rely on linking names to addresses, accuracy could not be guaranteed in all cases. Identity is disconnected from address in a growing number of transactions in the real world.

## **8. Security routines**

8.1 Questions were raised about routines used by Government departments for validating personal identity in its dealings with the public. Companies House routines showed the apparent ease by which a company can be hijacked simply by submitting change of name and address forms for the directors, and then a change of name and address for the registered office. Information is then sent to the new registered office, with no checks on the previous office: the company identity is thus effectively stolen.

8.2 A visit to the website for an online company update on the Companies House return, shows that it is necessary first to disable the security systems of a PC in order to access the supposedly secure system of the provider. This raises the question of whether there is any professional guidance for Government departments on the security of their routines for dealing with the public online. This also involves the psychology of passwords, accuracy of name and address data, and the establishment of good practice.

8.3 It may be useful therefore to run a workshop looking at what professional guidance and good practice is available and in place within departments, for the security of routines in dealing with citizens and business. Identifying what needs to be done and who should do it might assist eGU in its role as the guardian and standard bearer of public sector professionalism. **A meeting has been arranged for 23 March 1230-1400 in Portcullis House**

## **9. Date of next meeting**

9.1 The next meeting will be Thursday 21 April.