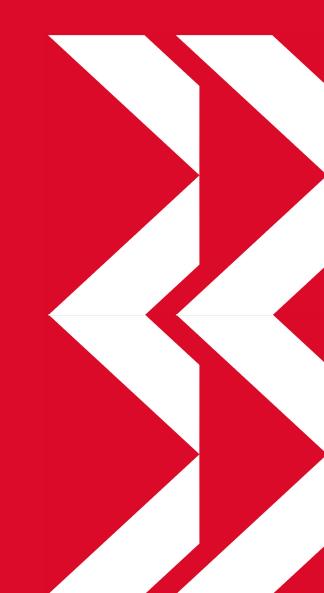
BritCard: A progressive digital identity for Britain

How well-designed digital credentials can help tackle illegal migration – privately, securely and fairly

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About

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About Labour Together

In Labour's wilderness years, Labour Together was founded by a group of MPs fighting to make the party electable again. Today, Labour Together is a think tank offering bold ideas for Britain under a Labour government.

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Foreword

It is thought that around 1 million people live in the UK without permission to do so, undermining Britain's social contract and sense of fair play. Many are exploited by criminal employers, which in turn suppresses wages for legal citizens and migrants alike. The Liberal Democrat-Conservative coalition government introduced the hostile environment - a suite of policies to block access to services like welfare - that has had little impact on the size of the irregular population. However, it did wrongly catch British citizens in the drag net. The Windrush scandal saw thousands of people wrongly targeted by immigration enforcement, including many legitimate British citizens who were unjustly detained or deported.

We believe that a progressive government does not have to choose between dealing with these injustices. It must tackle them all head on. There are no silver bullets to the challenges this Labour government faces - not least when it comes to migration.

The last Conservative government tried to sell populist solutions that predictably did not work. While they ploughed millions of taxpayers' pounds into the Rwanda scheme, the immigration system was left broken with open borders eviscerating public confidence.

The Conservatives offered enforcement theatre. Labour must offer real solutions.

We are both new to Parliament, representing constituencies of different profiles Labour previously lost in 2019. In our constituencies, a key reason voters chose Labour was they had lost trust in the Conservative's control of our borders. They now expect Labour to take back control.

One year into Government, it is imperative that Labour gets the system working again. Whilst the recent Immigration White Paper is a welcome start, there is a long road ahead. A universal digital ID - the BritCard - will not be a silver bullet to the problem of illegal migration. This paper does not pretend it is. We believe it should form an important part of Labour's enforcement strategy that does not compromise our principles and values.

We got into politics to pursue the common good: to tackle poverty and inequality, create world class public services, and make Britain the best place in the world to live, work and have a family. The reality is that some progressives have tried to avoid the hard truth: that achieving this means tough, fair rules about who is allowed to be here and which services they are able to access. It means effective, humane enforcement of these rules, so that people who overstay their visas are swiftly deported and those who exploit desperate migrants are punished to the full extent of the law. This paper shows that digital identity will help improve the enforcement of our rules dramatically.

But it is also progressive because it gives our residents and citizens the cast iron guarantees they have not previously had. This is your country. You have a right to be here. This will make your life easier. It is at the heart of the social contract.

On this, the Home Office has a sub-optimal track-record. But that is because we have never had a full, country-wide effort to give people the proof they need to demonstrate their right to be here.

The best way of doing it is through a digital identity: BritCard.

This will have many other benefits. Easy access to public services that are convenient and personalised. Easy ability to prove your identity, your age, your right to drive, and many other attributes to the state or privately. A debate is needed as to the framework to ensure privacy and how such a digital ID programme is developed within the public.

But there can be no doubt that this is the kind of ambitious, progressive project a Labour government should pursue to protect our borders and empower our citizens.

Jake Richards MP for Rother Valley Adam Jogee MP for Newcastle-under-Lyme In government, Labour has committed to reducing migration. Labour Together is supporting this agenda with a series of paper looking at how to create a migration system that puts country first. In October, we published our first proposal, for an Australian-style National Migration Plan, showing one way Labour could reduce the number of legal migrants while making sure Britain's economy gets the contributions it needs. Now, in this paper, we turn to how a mandatory, universal, national identity credential - BritCard - can help Britain control illegal migration and secure its borders.

Executive summary

For a progressive society to work, it needs to be able to collectively agree who is allowed to join it. Because it will exclude those who cannot join it, it needs to give its members proof that they belong. The UK doesn't do this. Our conflicted historic approach to issuing identity credentials has led to a situation that represents the worst of both worlds. We currently can't effectively stop people from living and working in our country illegally. Nor can we efficiently support legal citizens and residents to exercise their rights.

This paper makes the case for the introduction of BritCard: a mandatory national digital identity that would be issued free of charge to all those with the right to live or work in the UK, whether they are British-born nationals or legal migrants. The BritCard would be a verifiable digital credential downloaded onto a user's smartphone, which could be instantly checked by employers or landlords using a free verifier app.

By introducing a mandatory, universal, national identity credential - BritCard - the Labour Government has the opportunity to build a new piece of civic infrastructure, something that would become a familiar feature of daily life for everyone in the country. It would support better enforcement of migration rules, and protect vulnerable British citizens from being wrongly denied their rights. It could end identity exclusion, resolving uncertainty and risk for those whose status is uncertain, and providing a quick, secure, privacy-preserving means for everyone to verify their identity and their migration status when dealing with government, when taking up a new job, or taking on property.

It could lay the foundations for a fully-functioning digital identity system that would in time deliver huge benefits in terms of great efficiency and better outcomes in public services, as well as being a driver of growth, building on the existing One Login and Gov.UK Wallet. Our polling suggests it would be immensely popular; around 80% of the public support use of digital identity for a range of use cases.

All the necessary elements of the technology needed to deliver BritCard exist and are already in use in multiple arenas. The additional cost would be modest relative to other forms of infrastructure - we estimate between £140-400m. Applying internet-era test-and-learn design practices to the development of the BritCard would help to avoid the pitfalls faced by some public sector digital platforms. By embodying the highest standards of transparency and engaging in meaningful co-design, the Government could rebuild trust and ensure BritCard represented an improvement in privacy and accessibility. The Government has stated time and again its ambition to make the best possible use of technology to serve the public. With BritCard, it would be making a reality of that aim.

In the first part of this paper we explain why BritCard is needed, setting out the likely risks and benefits and putting it in the context of the Government's wider migration strategy and approach to digital identity. In the second part, we discuss how the Government could implement BritCard, exploring the costs, delivery approach and technical specifications.

Summary of recommendations

Given the very significant political and delivery benefits, moderate costs and the deliverability of this policy, the Government should announce as early as possible in Summer 2025 its intention to explore introducing a digital right-to-work and right-to-rent credential, as part of its plan to tackle illegal migration.

It should also:

- Make a robust and up-to-date assessment of the current undocumented population
- Agree a digital identity strategy at the Digital Interministerial Group with Home Office involved as an extraordinary member, as well as at DG level with a new working group with representatives from all relevant departments
- Hire a very senior, high-profile and experienced political figurehead or tech sector professional to be the cross-government champion and external face of its digital identity programme
- Make clear that digital identity is a top Prime Ministerial priority through a high-profile launch and strategy white paper
- Develop a technical specification and policy case for a digital right-to-work credential (a joint project between the Department for Science, Innovation and Technology (GDS), and Home Office as identity and migration lead department). Prototyping and service design testing should also be part of this process
- Convene a new stakeholder working group to participate in development of this project, including and pioneering innovative co-design practices, going beyond just consultation. Central to this working group should be the inclusion of excluded or marginalised groups as priority user cohorts
- Ensure accessibility for those with low digital skills and non-smartphone owners, including the provision of in-person support channels
- Prioritise trust and transparency across the development and deployment of the BritCard, giving users control of how and when their data is used, and adhering to a test-and-learn approach
- Allocate funding to support the development of the BritCard digital identity system, following best practice for funding digital teams
- Learn the lessons from other successful rapid tech delivery projects such as the NHS App, COVID Pass, EU Settled Status Scheme and Universal Credit
- Embed digital-era working practices in the new project team, including definition and regular publication of usability metrics (e.g. onboarding success rate for people without passports)
- Rebrand the Gov.UK App and Gov.UK Wallet as the "BritCard app"

1.1 Introduction: the role identity plays in a progressive migration strategy

Digital identity should form a key part of the Labour government's strategy to deal with illegal migration.

Progressives have to care about illegal migration for two reasons. The first is foundational. We believe that we achieve more together than we do alone. It matters who that 'together' is. It is a national identity, bound together by common rules and obligations. The poorest in society will put in less than they get out over the course of their lifetimes. For social democrats, that is part of the point of the state. But it requires Britain to be selective in who it invites to join the club.

Because it matters who is part of Britain, progressives have to take borders seriously. If the market was our **only** organising principle, they would matter less. Such a society would leave core functions of the state to the individual. If you needed medicine when you fell sick, if your market wage did not reflect what you needed to thrive, if you needed to school your children, that would be your responsibility. It would matter much less who was in your society, because society would matter less.

Dealing with illegal migration should be a progressive priority. The fact that they are exploited by criminal employers and slum landlords should redouble our moral resolve. No-one relishes what this means: telling people who are coming here to build a better life for themselves that they cannot build it here. But it is a duty that progressives have to fulfil.

This Labour government has to do many things to grip the illegal migration challenge that it faces. As of February 2025, a large majority (77%) of the public believed that immigration was being handled poorly¹. The Government has already increased the pace of deportations; and eVisas will help identify visa overstayers. But there is more to be done. Court bottlenecks need to be addressed. Multilateral solutions to boat crossings have to be pursued.

Digital identification should play a part in this strategy.

Securing our borders

Digital identity can play an important role in improving the effectiveness of our right-to-work and right-torent checks, and toughening up enforcement against those who negligently or criminally employ or rent illegally. At the moment, enforcement is post-hoc. Employers and landlords maintain records of checks, and face a penalty if they are found to have illegally employed or rented to a migrant.

Enforcement at the moment is looking for a needle in a haystack of 2 million employers and 2.8 million landlords. A digital identity would allow the Home Office to build a canonical record of where and when checks have been successfully completed. This record could then be cross-checked against administrative datasets - like PAYE records and the forthcoming National Landlord Database. The haystack would shrink, and those who seek to profit from illegal migration could be identified and sanctioned faster.

As the BritCard is rolled out, it could also be used for controlling who can access other services such as welfare benefits. This matters to people. In our polling the top priority for those who thought that immigration was one of the most important issues facing the country, was "Ensuring that people migrating to the UK do not unfairly access social housing, welfare or other forms of government support" (51% chose this)².

In principle, we already have strict rules for identification for access to certain NHS services and benefits two services at the front of voters' minds. But these rules suffer from the same enforcement deficit. Identity fraud, for example, is a significant driver of fraud and error in the benefits system. Tying access to a single, secure form of digital identity helps solve these problems. Introducing a BritCard would also send a clear signal to international partners (especially France - a key partner in helping to manage the integrity of our borders) that the UK is doing all it can to prevent illegal migrants disappearing into the economy. The UK's lack of a universal national identity is widely regarded as a weakness in our efforts to tackle illegal migration. The Home Office has already undertaken social media campaigns aimed at dissuading Albanians from coming to the UK illegally, and the move to BritCard should feature as part of similar communication efforts in future³.

This will clearly not be a silver bullet on small boat crossings. Most people who come to Britain via this route are making asylum claims. Home Office research suggests that the perception of Britain as 'a soft touch' plays a limited role in people making journeys. The critical bottleneck to removing failed asylum seekers is appeals and deportations, and Labour is rightly focussed here⁴.

But half of those whose asylum claims were turned down over the past fourteen years are likely to still be here. To take a particularly egregious example, over 1% of the <u>total</u> Albanian male population - around 13,000 people - came to Britain via small boats since 2018. At least 12,000 Albanians broke their bail conditions in 2022, the peak year of their arrival by small boats⁵. Those who disappeared are here illegally.

Deterrence is downstream of enforcement. If we don't enforce our rules, then people will rightly be undeterred from living here illegally. If it was clear that those who stayed in the UK without permission would not be able to find work, a place to live or access public services if they stayed in the UK without permission, people would be less likely to risk doing this. Enforcement won't be perfect, so deterrence won't be either. But we can do much better.

Protecting British citizens and lawful migrants

The second reason progressives have to care about illegal migration is to do justice for those who have the right to be in Britain but do not have proof. Now that we require people to prove who they are in order to work, rent and access public services, we should provide them with the means to do so. The Conservatives implemented right to work and rent checks without these safeguards. At least 164 British citizens were wrongfully detained or deported as a result, with thousands of others facing severe financial losses and harassment as a result of the Windrush scandal⁶.

It is tempting to conclude that the Windrush scandal was down to poor process and culture. If only someone had paid proper attention, it could have been avoided. And, indeed, the historical record of the Home Office on identity is poor. When we speak to migrant rights' organisations, the labyrinth of different schemes, data points and databases feels like it conspires to create a cruel muddle. We should treat people who have the right to be here with dignity and respect. It is obvious that often we have not.

A universal, mandatory digital ID would be a significant undertaking, as the remainder of this paper demonstrates. But it is also a huge opportunity.

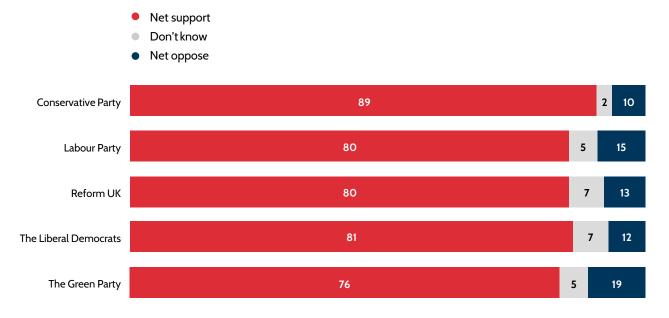
BritCard could play a crucial role in restoring legitimacy and fairness in the minds of the public. This would help to detoxify the immigration debate and have positive effects for our legal migration system, opening up space for a more fair and compassionate approach.

We conducted polling to test the likely public response to the BritCard. Our polling showed that overall, around 80% of respondents supported the introduction of a digital right-to-work credential to help tackle illegal migration, and 79% supported a digital right-to-rent credential.

To what extent, if at all, would you support or oppose this ID card being introduced if it was used by...

...employers to check whether someone has the right to work in the UK or not?

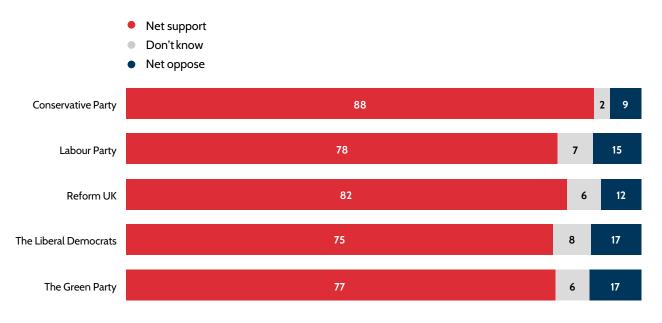
% of all Britons by current Westminster voting intention



Source: Labour Together polling, February 2025, 1,912 GB adults

...landlords to check whether someone has the right to rent in the UK or not?

% of all Britons by current Westminster voting intention



Source: Labour Together polling, February 2025, 1,912 GB adults

When asked about the potential risks of introducing a digital identity to help manage migration, people's biggest concerns were the risk of the technology being misused by a future government (40%), and the cost of the system (33%), followed by the impact on the undocumented population (23%)⁷.

POTENTIAL RISKS OF INTRODUCING A DIGITAL IDENTITY	%	
The technology could be misused by the government down the line	40%	
The cost of implementation	33%	
It could lead to the worsening of the 'Black Economy'/crime as people are pushed towards illegal working	23%	
It would make life harder for people who are already in the country illegally	13%	
It could lead to the greater persecution of migrant communities	11%	
The potential negative impact on businesses	7%	
Other (tell us)	4%	
Don't know	12%	
None of the above	10%	

The biggest potential advantages identified were reducing access to public services by those not entitled to them, and deterring illegal migration.

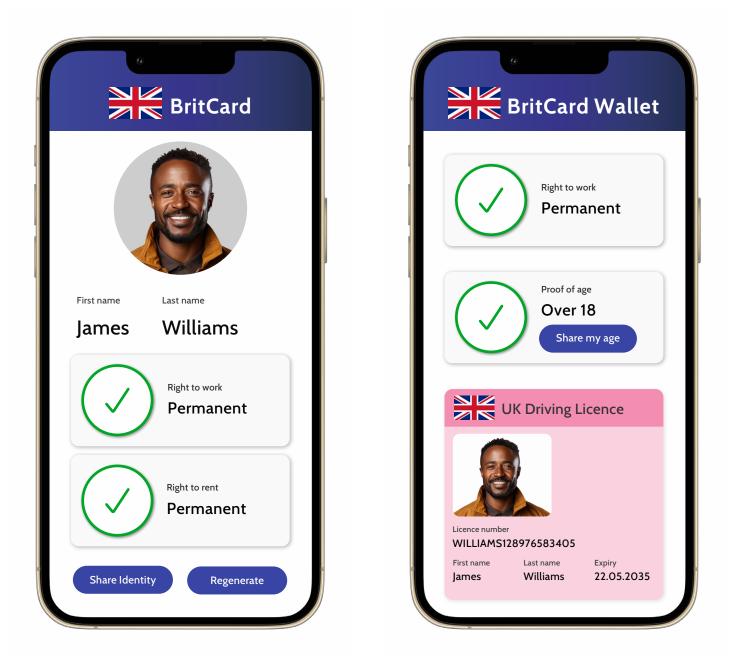
POTENTIAL ADVANTAGES OF INTRODUCING A DIGITAL IDENTITY	%	
Reducing the number who access public services that are not entitled to	29%	
Deterring people from coming to the UK illegally to work	29%	
Reducing benefits fraud	17%	
Making it harder for people who are in the UK illegally to access housing	15%	
Making it harder for employers to employ those who do not have the right to work in the UK	13%	
Reducing exploitation of illegal migrants and modern slavery	12%	
Making it easier for legitimate UK citizens to prove their right to work	9%	
Reducing exclusion by providing a universal ID for people who don't have a passport or driving licence	8%	
Improving the overall efficiency of public services	7%	
Reducing the risk of immigration enforcement officers taking action against people who have the right to be in the UK	6%	
Reducing online fraud	3%	
Improving online safety by making it easier to prove your age online	2%	
Making public services cheaper	2%	
Making public services more convenient to use	2%	
Reducing costs of businesses by making it easier to prove who you are digitally	2%	
Making public services more personalised	1%	
Other (tell us)	1%	
N/A - I don't believe there any benefits of a digital ID card	12%	
Source: Labour Together polling, February 2025, 1,912 GB adults		

As the polling shows, the public is clear that this technology must come with appropriate safeguards, checks and balances. Because we are proposing a universal and mandatory scheme, it would need to be well run, efficient and beneficial to every British citizen. Because a digital identity will have many other benefits, people should see it as a convenience to get, not a burden. The government would need to invest in services for digitally-excluded people and people whose documentary evidence is weak and fragmented. Labour would, in short, have to actually solve the long-running failures of British identity policy.

"We have taken lots of immigrants. We are an island [and] it puts a strain on all the services. It comes to a point where you need to say enough is enough."

- Reform Considerer (Feb 2025 Focus group)

1.2 What is a BritCard?



BritCard is a set of digital verifiable credentials that would be stored on a user's smartphone, and used to securely prove their migration status. It could be instantly verified using a free verifier app that employers and landlords could download. It would be **mandatory**, **universal** and **free of charge**.

It would be accessed via the <u>Gov.UK</u> Wallet, with One Login as the identity verification layer. Over time, the same system used to support the right-to-work and right-to-rent credentials could underpin many other features, allowing users to access and use a wide range of data and attributes generated by interacting with the public sector. For instance, the digital driving license and associated data, a proof of age feature, and healthcare records could be accessed and shared at the user's discretion via BritCard.

BritCard should be developed according to the test-and-learn approach that the Cabinet Office has championed, and be co-designed with users (for more details on delivery, see Part 2)⁸.

1.3 How the BritCard right-to-work and rightto-rent credential would work in practice

Currently, when an employer hires someone, they have to confirm that they have the right to work in the UK. Legal migrants to the UK can do this digitally using an eVisa. UK and Irish nationals can prove this by showing a physical passport or one of 15 other documents. Some employers (23%) - including parts of the NHS - choose to use a commercial identity services provider (IDSP) to conduct the check on their behalf.⁹ However, this is at the expense of the employer, so, perversely, there is actually a disincentive to hire UK nationals relative to legal immigrants - something which employer bodies such as the Recruitment and Employment Confederation have raised concerns about.¹⁰

However, many employers do not carry out right-to-work checks at all. The Home Office's Immigration Enforcement team fined 1,090 employers between July 2024 and January 2025¹¹ and it is likely that this is only the tip of the iceberg of non-compliance.¹²

Because of the complexity of the rules¹³, it is relatively easy for a worker or tenant to present a document that belongs to someone else or to produce a fake document. In a recent survey conducted by the Home Office, 80% of businesses surveyed answered at least one compliance question incorrectly, and were therefore at risk of non-compliance¹⁴. There are cases where businesses have been fined by the Home Office for accepting illegitimate documents, despite having made every reasonable effort to comply with their obligations in good faith. The Home Office faces frequent legal challenges when it imposes penalties on employers, wasting taxpayers' money (one law firm alone claims to have overturned 10 penalties in 2024-25).¹⁵

With BritCard, the Government would issue a secure digital credential to everyone with the legal right to work and/or rent property in the UK, whether they were a British or Irish citizen, had indefinite leave to remain, had EU Settled (or Pre-Settled) Status, or had a valid visa. The credential would be accessed via a One Login account and downloaded to the user's smartphone.¹⁶ UK nationals currently under 16 would become eligible for one on their 16th birthday, at the same time as receiving their National Insurance Number.

In the case of checking right to work, employers could check the credential using a freely-available verifier app and get an instant confirmation that the employee did or did not have the right to work in the UK. The app would show whether the employee's right to work was permanent or time-limited (i.e., linked to a visa). If the employee did not have a current right to work, the app would show this and the employer would be required not to employ them.

The act of requesting the check would also create a record shared with the Home Office, which would gather metadata generated by the verifier app, so that it would become clear how many checks companies were making. This could then be cross-checked with employee figures shared with HMRC for PAYE purposes, or with Companies House data, to make sure that employers were conducting right-to-work checks for all their employees. This could help to rule out compliant employers from enforcement efforts, and target investigations and raids to the biggest non-compliant employers.

A similar process would take place when a prospective tenant wanted to prove their right to rent to a landlord. The Home Office could use the establishment of the National Landlord Database to help ensure that landlords are aware of their responsibilities and get the verifier app.¹⁷ As with right-to-work enforcement, the data generated by the verifier apps could be cross-checked with the new database to target enforcement activities more efficiently, starting with the biggest non-compliant landlords.

The BritCard would be made available from a given date (say 1 September 2027), and made compulsory for all workers, tenants, employers and landlords to use from a later date (say 1 March 2028). It would have a gradual effect since only a small proportion of the population signs a new employment contract or rental agreement each year. We recommend that the credential is made mandatory for new employment and

rental contracts signed following the introduction date. We do not recommend obliging employers and landlords to re-check all existing employees and tenants, to avoid creating unnecessary disruption and costs.

To support better awareness and uptake of the new credentials, the Gov.UK App and <u>Gov.UK</u> Wallet could be relaunched as the "BritCard App". This would create an eye-catching, memorable brand for the new Government-issued credentials and wallet. The same app and wallet would be used for accessing the full range of digital credentials currently planned for delivery by 2027, with identity verification fulfilled by One Login.¹⁸

There is a striking lack of understanding of the size and nature of the undocumented population in the UK.¹⁹ As part of the test-and-learn policy and service development process, the Home Office would need to develop a better understanding of the likely impacts of introducing the BritCard on key user groups. This work should look at direct and behavioural impacts of the tool on the existing undocumented population.²⁰

Moving to BritCard would reduce the options open to illegal migrants and increase the potential gap in treatment between workers in legitimate and illegitimate employment. It would therefore need to be accompanied by tougher enforcement sanctions to ensure that unscrupulous employers and landlords who seek to take advantage of the precarity of migrants are punished.

1.4 BritCard would make right-to-work and right-to-rent checks more secure and effective

Introducing BritCard would allow employers and landlords to instantly and securely check that someone has the right to be in the country, at no cost. Under current arrangements, many employers and landlords may not carry out effective checks because they don't know they need to; because they are unable to because employees and tenants lack identity documents; or because there are costs associated with doing so. With BritCard, there would be no barrier to law-abiding employers or landlords carrying out their legal obligation to check immigration status.

For black market, cash-in-hand employers operating completely under the radar, and knowingly employing workers illegally, other enhanced enforcement approaches will be needed to identify and sanction them (the new single work inspection body should help with this).

But ruling out the other three failure modes will improve the culture of compliance and increase expectations amongst legitimate employees. Those with a BritCard would be able to demand proper standards and pay, even in the less formal economy (e.g. seasonal agricultural labourers), making it harder for illegal employers to operate. The money saved by making enforcement more efficient and targeted could be redeployed to help tackle the most egregious underground operators.

The Home Office is currently extending the requirement to conduct right-to-work checks to the gig economy. It also "strongly encourages" firms to carry out the checks for self-employed contractors. It could strengthen and extend this guidance if digital identity is in place, therefore potentially hugely extending the remit of right-to-work checks to the less formal labour market.²¹

1.5 Better targeted enforcement of right-towork and right-to-rent checks

Under the system Labour inherited, a typical employer will face a check on their application of right-towork once every 150 years. Landlords can expect to be fined once every 7,650 years.²² This means that compliance is effectively optional. When paired with HMRC Pay-As-You-Earn and Companies House data, BritCard would make it much easier to enforce right-to-work checks. Setting up a verifier account could be made a condition of becoming an employer. The Home Office would be able to instantly check whether other employer data was consistent with the number of right-to-work checks registered as completed by that account, and target their investigations and raids towards the companies with the biggest discrepancies between metrics such as the number of employees listed for PAYE, and their right-to-work check records. (While there is already provision for data-sharing between the Home Office for the purpose of enforcing right-to-work checks, there is no way for the Home Office to know before they raid an employer whether or not they have complied with the checks properly.)

The digital right-to-work credential could be time-limited and updated in real time. For instance, it would become invalid automatically at the point when a work visa expired. Employers are already "nudged" by Home Office Immigration Enforcement to re-check employees who have a temporary right-to-work (i.e., their right to work is conditional on a time-limited visa). Since right-to-work checks could be done instantly and with no cost to the employer, it would be possible to require more frequent checks so that visa overstayers would be caught even after they had already taken a job.

1.6 BritCard would make right-to-work and right-to-rent checks easier and quicker

Introducing this tool would give UK nationals and legal immigrants a quick, secure way to prove their right to work, and make life simpler for employers and landlords to comply with their legal obligations to conduct right-to-work and right-to-rent checks. This would be particularly valuable for temporary or agency workers who are often forced to prove and re-prove their right to work every time they take up a new work assignment, creating delays, hassle and reduced earnings. It would reduce complexity and administrative burdens for employers, landlords and letting agents. At least one business we spoke to mentioned the need to introduce staff training and record-keeping processes specifically to meet their obligation to conduct right-to-rent checks.

BritCard would make it much easier to conduct secure right-to-work and right-to-rent checks remotely, further reducing costs and barriers to employment.

It would support broader efforts to tackle modern slavery, by enabling more effective targeting of checks and thus improve identification of victims. As the Modern Slavery Act reaches its tenth year, its 'toothlessness' is once again in discussion. Introducing the right-to-work credential would help to close some of the existing gaps, better protecting these workers and also British workers currently undercut by exploitative working practices.

The new BritCard credential would help to improve privacy and reduce discrimination, because it would allow workers and tenants to prove their right to work or rent without sharing any more information than that (e.g., nationality or place of birth), and would avoid the need for multiple organisations to store paper or unsecured electronic copies of identity documents, increasing the risk of identity fraud.

As a consequence of the way the Conservatives implemented the then-hostile environment, ethnic minorities have faced discrimination. For instance, under the current system of right-to-rent checks, landlords have been shown to be less likely to show or let properties to people of colour.²³ BritCard addresses this by introducing one simple way for everyone to prove their immigration status that is free, instant and convenient.

1.7 BritCard would end identity exclusion and prevent another Windrush scandal

Equally importantly, moving to BritCard would provide an opportunity to solve the problem of undocumented residents who nevertheless have the right to live and work in the UK - the "ID excluded". In order to be effective, BritCard would be made available to everyone in the country with the legal right to be here. Successive governments have dodged this issue, preferring to leave it to individuals - who may often be low-income or vulnerable - to struggle on without proper identity.²⁴ The most serious consequence of this has been the Windrush scandal, whereby hundreds of British citizens faced harassment and even deportation because the Home Office wrongly considered that they did not have the right to live in the UK.²⁵ This has been widely condemned; and our polling shows there is appetite for Government to address this injustice: 74% of respondents supported the idea that victims of the Windrush Scandal should be granted citizenship and free British passports. Nearly two-thirds (63%) thought children born in the UK should be entitled to British citizenship.²⁶

Developing a canonical, up-to-date view of the set of people with the right to be in the country at any one time would help to avoid any repeat of the Windrush scandal. It's important to recognise that it can be unclear or uncertain whether an individual has the right to live and work in the UK. For instance, Amnesty International and the Project for the Registration of Children as British Citizens have pointed out that there is a group of people for whom their right to citizenship has yet to be asserted, and for whom there can be costly and invidious barriers to doing so.²⁷

Alongside enhanced measures to deport people who are in the UK illegally, rolling out BritCard would mean making proactive efforts to find people with a legal claim to be in the UK and support them to establish this. This one-off programme, similar to the EU Settled Status scheme, would provide a "clean slate".

As part of the roll-out of the BritCard, in-person support channels should be provided to help people set up their One Login account, and claim their right-to-work or right-to-rent credential. Some systems along these lines are already being envisaged as part of the roll-out of One Login; these will need to be extended and improved to account for the fact that having the BritCard will become necessary for all those wishing to work or rent accommodation. Following a test-and-learn approach will help to ensure that the most effective routes are developed for reaching and supporting those who have previously been ID-excluded.

1.8 How BritCard could lay the foundations for a fully-functioning digital identity ecosystem for the UK

Identity has a fraught history in the UK.²⁸ Since World War Two, the British Government has not provided a foundational identity to its citizens. In its effort to protect civil liberties, the state has tied itself in knots. It has introduced myriad requirements for people to prove their identity and other facts and attributes about themselves. But it has not provided effective tools to allow them to do that.

The main identity credentials offered by the state - birth certificate, passport, driving licence - are currently only offered in physical form; and none of them is in itself an "identity" document.

The UK is unusual internationally in not having a national digital identity. While the concept of a stateissued foundational identity was for a long time highly contentious, developments in technology (largely in the private sector), and the abrupt need during the COVID pandemic for better digital tools (for instance, the NHS App and COVID Pass feature; the COVID Track and Trace App; and the vaccine appointments booking system) have helped to drive a shift in the debate amongst politicians and commentators. Public attitudes towards digital identity have been broadly favourable for years: in general British people value convenience and are relatively relaxed about adopting technology.

There are clear wider policy benefits to providing a fully functional digital identity for UK citizens, including for individual convenience, to support personalised and proactive public services, to provide business insights for public service designers and owners, and to generate national-level insights to support better policy-making. Digital identity can help tackle some of the most difficult challenges facing government, such as online fraud, harmful online content, benefit fraud and waste, as well as making healthcare more effective and efficient. The Tony Blair Institute estimates that a digital identity could save taxpayers £2 billion per year through tackling fraud, improving the tax take and targeting economic support.

Our polling revealed extremely strong public support for using a digital identity system for a range of use cases (right-to-work, and right-to-rent checks, as well as controlling access to the NHS and the benefits system) - and these numbers are relatively consistent across voting history and intention.

To what extent, if at all, would you support or oppose this ID card being introduced if it was used by...

80

...the police to check someone's criminal record?

% of all Britons

- Net support
- Don't know
- Net oppose

...the NHS to check health records?

% of all Britons

- Net support
- Don't know
- Net oppose



...the NHS to check whether someone is entitled to free healthcare?

% of all Britons

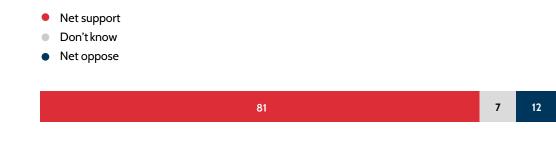
- Net support
- Don't know
- Net oppose

6

14

... DWP to check whether someone is eligible to claim benefits?

% of all Britons



Source: Labour Together polling, February 2025, 1,912 GB adults

The Government is currently delivering One Login, a single log-in system for Government and public services; and the Digital Identity and Attributes Trust Framework, a marketplace for accredited commercial providers to offer identity and verification services in both public and private sector contexts.

It has already announced that all Government services that provide users with a credential will need to offer a digital version by the end of 2027. A digital driving licence is also in development. A Government-issued "digital wallet" is being designed and is due to be launched this summer; meanwhile the Department for Education is also launching a digital single pupil number, and work continues to develop the NHS App.

While these initiatives are highly valuable, they fall short of delivering the full potential benefits of digital identity. They also perpetuate some inconsistencies under the previous Government: One Login and the Trust Framework were previously led by different departments, and work is still under way to establish how the two systems work together. The Government has yet to articulate its vision for what good looks like including key questions around what functions should be provided by the state, and what by the private sector.

Alongside the current proliferation of vertical initiatives there is a lack of investment in the underlying data and infrastructure, much of which is dangerously outdated. Individual departments are not well enough coordinated with the platforms being developed by DSIT. To bridge the gap between the current arrangements and the fully-functioning digital identity ecosystem that organisations like the Tony Blair Institute have recommended, the Government should identify one or two significant use cases that are politically significant and have the potential to be useful to a large proportion of the population and focus on delivering that.

Introducing BritCard would provide a workable scope and focus for efforts to move towards this more comprehensive system. Paired with a clearer cross-Government vision for what the end-point looks like, it would be the best way to demonstrate progress to the public and lay the foundations for a much better state.

2.1 How to design and implement BritCard: embracing test-and-learn to build trust and save taxpayers' money

Building out the BritCard would be a significant project, requiring investment of financial and political capital. It would represent the start of a fundamental transformation in the way British citizens interact with the Government. Major public IT projects are often criticised for running late and over-budget (for instance the NHS Spine). Even worse, a series of high-profile failures and abuses linked to public sector tech tools (the Post Office Horizon scandal; the A-level results algorithm) has badly dented public trust in governments' commitment and ability to deliver tech that is fair and transparent. But by embracing a test-and-learn approach, BritCard could be an exemplar of a piece of public sector digital infrastructure that builds in trust and transparency by design.

Capability in the public sector is improving rapidly thanks to efforts under the new Government to build out the new Digital Centre of Government. Even before this, previous Governments were able to spin up high-volume digital services such as the NHS App COVID Pass and the EU Settlement Scheme successfully. In part this is a result of the Government Digital Service diaspora and the greater understanding that GDS drove of the importance of integrating modern service design practices into policy-making.²⁹

The Digital Centre of Government, HM Treasury and Cabinet Office are pioneering new approaches to managing IT and tech projects.³⁰ The Minister for the Cabinet Office launched a £100 million test-and-learn fund in December, along with a scheme to bring technologists into Government on secondment. This programme should draw on these resources. Alongside this, the Treasury and the Department for Science, Innovation and Technology have reviewed how existing funding arrangements impact digital projects, with a view to reforming how they are funded in future to maximise flexibility, and reduce wastage. The Vaccines Taskforce illustrated how tasking a team with a very specific, critical mission and empowering it to work in close partnership with the private sector and with agile funding can deliver rapid results. The BritCard right-to-rent/ right-to-work credential could be a flagship project to illustrate the Government's mission-driven approach to public sector modernisation.³¹

A central tenet of the test-and-learn approach is that key assumptions should be tested and validated early and often. Desk-based research like this paper can only go so far in proposing up-front what a system should look like. We have sketched out below a model for how the BritCard system could work, what it would cost and how the Government could go about delivering it but the quickest and surest way to determine these is for the Government to set up an initial project team. Without prejudice to the findings of that team, we have set out below some of the key considerations for the purposes of an initial feasibility check.

2.2 Technical specification and operating process

BritCard would be a set of verifiable credentials held in a smartphone wallet. This could be either the <u>Gov.UK</u> Wallet already in delivery (rebranded as the BritCard Wallet); or a certified private sector wallet such as Apple or Google Wallets. The identity binding function (i.e, the mechanism for making sure the person who accessed the credentials was the right one each time) would be provided by One Login. To use BritCard a user would first need to set up a One Login account.

Credential issuance

For the majority of UK adults who already hold a British passport, setting up their One Login and claiming their BritCard right-to-work or right-to-rent credential would be straightforward, with the HM Passport Office database of passport holders used as the basis for issuing credentials to all passport-holders. Likewise, for immigrants to the UK with the right to work or rent, their credential could be automatically issued based on their record in the UKVI database, which currently supports the issuance of eVisas.

The Home Office would provide a service which issues a credential to One Login for storage in the <u>Gov.UK</u> App. This service would handle credential issuance for both UK nationals via HM Passport Office data and immigrants via UK VI data. In some cases the user may need to log in, for example to their UKVI account, but in others the issuance may happen in the background, for example where a user proves their identity in One Login using a UK passport.

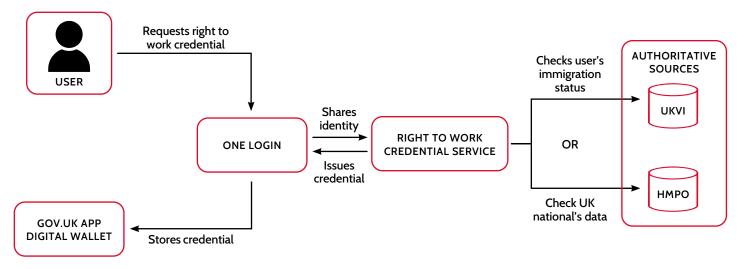
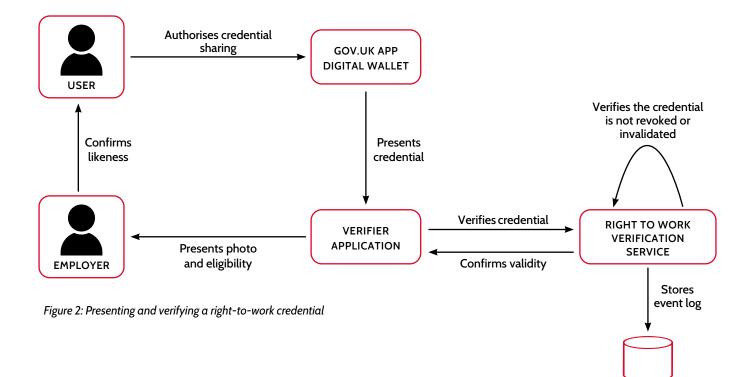


Figure 1: Claiming a right-to-work credential using One Login and the Gov.UK Wallet

Credential verification - in-person workflow

When a user wanted to prove their right to work or rent, the credentials would be verified using a verifier app that would be free to download. The user unlocks their phone using its inbuilt biometric security. They open the Wallet app using One Login. They select the relevant credential and present it to the verifier (the employer or landlord).

The verifier would unlock their device, and open their verifier app using their One Login for Business. This application reads the credential from the user's device, which may use the web or an offline protocol (such as NFC). The credential should have an embedded biometric (image) to support offline verification. The employer is then able to confirm the likeness of the individual to the credential presented. The verifier application is able to verify the credential using its digital signature, but may also additionally validate the credential by contacting a verification service. In the event of an offline check, the validation may happen at a later time when the verifier device returns online.



Remote credential verification workflow

To complete a right-to-work or right-to-rent check remotely, the user could grant consent via the Gov.UK/BritCard Wallet App for a secure digital proof of their migration status to be generated and a confirmation shared with a named organisation (their prospective employer, letting agent or landlord).

COMPONENT	FUNCTION/COMMENTS	NEW OR EXISTING?
Right to Work/Rent Credential Service	Issues a secure credential assumed to contain an embedded biometric (photo), which can be held in and presented by in the Gov.UK /BritCard App. The credential may be either ISO/IEC 18013 compliant, a W3C Verifiable Credential or an equivalent not currently existing	New
Right to Work/Rent Verification Service	Receives notification of a credential check being carried out, checks its validity (e.g. against revocation) and optionally logs metadata	New

Verifier Application	An application that can read a credential from the GOV.UK/BritCard App and verify it using a verification service	New
UKVI database	Should support this without significant changes - the data is already there	Existing
HMPO database	Already supports UK passport checks	Existing
GOV.UK One Login	Cross-government identity verification platform	Requires modification to support this use case
GOV.UK Wallet App	App in development that allows for secure storage of government-issued credentials	Requires modification to support this proposed credential and verification feature

2.3 Costs

We estimate that it would cost between £140-400m to build the digital right-to-work/right-to-rent credential and integrate it with Home Office's enforcement strategy. This would include around £10m to upgrade the existing Gov.UK App and rebrand it as the BritCard App, and £10m of improvements to the HMPO and UKVI databases. A credential service would cost around £20m and a verification app and service a further £30m. Coordinating and integrating all this could increase costs slightly, but even allowing for a 50% optimism uplift, the total should not come to more than £150m.

Once built, it would cost around £5-10m per year to administer the system. Costs would depend on design decisions such as how to provide the credential to digitally excluded people. The onboarding costs would taper away over time as the ID-excluded proportion of the population shrinks, and as more new adults are issued with the credential at age 16.

This should be set in context of the Home Office's £640m spend for 2023-2024 on tackling illegal migration. We anticipate that a digital right-to-work/right-to-rent credential could greatly improve Immigration Enforcement's ability to keep enforce the obligation to undertake right-to-work/right-to-rent checks, potentially increasing revenue from civil penalties imposed on illegal employers.

A key benefit of introducing the credential would be that over time the Home Office would develop a complete and definitive record of all those with the right to work and rent property in the UK. The underlying databases concerned belonging to UKVI and HMPO will need some level of investment and development whether or not a right-to-work or right-to-rent credential is delivered. There is a standing commitment to provide a digital passport (although passports were notably excepted from the commitment to provide digital versions of all government credentials by 2027), so there is no option to spend nothing in this area: investment is already needed. There may also be savings to be made from reducing use of consultants for the delivery of One Login.

The Home Office is also already due to spend £200m on a border data system between 2023-2025.

This data system should be immediately leveraged to support the necessary credentials and data-sharing. Furthermore, in the process of building out the necessary digital capability to deliver this, the Home Office could improve the process for allowing existing passport-holders to obtain a One Login ID, saving several millions in infrastructure costs currently being shouldered by the Government Digital Service.

Recommendation:

The Government should allocate funding to support the development of the BritCard digital identity system, following best practice for funding digital teams.

2.4 Legislation

Some legislation may be needed to amend the existing requirements for employers and landlords to check right to work and right to rent.³² For instance, a new requirement would be needed to oblige businesses to use only the BritCard once fully rolled out. Existing legislation and arrangements should be sufficient to allow the Home Office to share data with other government departments as needed to support illegal migration enforcement. Necessary legislative changes could be developed in parallel with development of the credential and complementary services (the service that checks the credential against the Home Office databases, and the verifier app for employers/landlords).

2.5 Test-and-learn, user focus and co-design for better policy and service design

Adopting agile project management, cross-functional teams and iterative design can help to ensure that the effect of digitalising aspects of public services is to empower users, not bake in existing inequities or introduce new ones. Developing a sophisticated understanding of the scale and characteristics of the UK's undocumented population should form a core workstream for the BritCard project team.

Recommendation:

As part of the work to deliver BritCard, the Home Office should make a robust and up-to-date assessment of the undocumented population.

There is a wealth of expertise in the public and private sectors on how to design and implement new digital services so as to meet users' needs and minimise unforeseen consequences. The BritCard programme should draw on the input of a diverse stakeholder working group. To succeed, this group needs to reflect real user experience, particularly those at risk of exclusion or harm. Their engagement should go beyond just consultation and instead aim at co-producing service outcomes.

Recommendation:

The BritCard project team should establish a stakeholder group and pioneer a meaningful innovative co-design process, going beyond just consultation. To make a reality of this it should:

- Ensure the stakeholder group includes civil society representatives (migrants' rights organisations, housing charities, digital inclusion experts)
- Schedule co-design and usability sessions with affected users, not just feedback rounds
- Make engagement continuous, not one-off feeding directly into design decisions and comms strategies

• Publish user research and design iteration summaries to show how the programme is learning and evolving based on real user needs

As mentioned above, it can be complicated to establish a person's legal migration status. Introducing a mandatory universal digital tool would mean that there would be significant impacts for individuals who were not able to get a One Login and a BritCard. There should be a robust means of independent review and redress for cases where applications were denied.

Recommendation:

The BritCard and One Login project teams should build in a robust means of independent review and redress to allow individuals to appeal against decisions not to issue a One Login account, or where the BritCard right-to-work and right-to-rent credential expired or was withheld or withdrawn.

2.6 Inclusion

Onboarding for ID-excluded UK adults

For UK nationals who currently don't have a passport, there would be a prior process required to get onboarded with One Login and connect to their existing birth record. The 2021 Census showed 8 million UK residents did not hold any passport.

One Login currently has provisions for digital inclusion so that adults without digital identity at the moment can get a One Login ID. This process would need to be enhanced so that it could cope with a potentially high level of demand, and so that it could provide sufficient assurance that the holder had legal right to work in the UK.

The process for enabling those without a passport to get a One Login account and digital right-to-work / right-to-rent credential could learn from the example of the EU Settled Status scheme, which fulfilled a similar function of identifying a set of people and accrediting them with a specific status. EUSS dealt with 8 million applications and onboarded 6 million people between 2019 and 2024, at a cost predicted at around £500 million. There is some indication that it was successful in its attempt to provide a user-friendly system.³³ One notable difference is that the EU Settlement Scheme depended on existing biometric identity credentials.

Recommendation:

Design with the aim of ending identity exclusion. This could entail, for example:

- Include excluded or marginalised groups as priority user cohorts in alpha and beta testing
- Define usability metrics (e.g. onboarding success rate for people without passports) and publish them regularly
- Use these findings to inform service adjustments before mandating system-wide rollout in 2028
- Set up a dedicated ID inclusion workstream during discovery similar to the approach adopted as part of the EU Settled Status Scheme to handle vulnerable applicants
- Identify delivery partners (e.g. Job Centres, local councils, housing providers) to support face-toface onboarding
- Prototype the experience of someone without a passport obtaining a BritCard and iterate on that flow before beta
- In user research, test for intersectional barriers (e.g. young care leavers with no ID and limited support networks) and look to partner with organisations already working at these intersections

The project will also need to work for non-smartphone owners, and those less comfortable or familiar with digital tools.

Recommendation:

BritCard should be easily accessible to those with low digital skills and non-smartphone owners. To deliver this, the project team should:

- Define a minimum viable "non-digital channel" as part of service design (e.g. printable or smartcard-based version of the BritCard)
- Establish criteria for who qualifies for an offline credential, and ensure these are integrated into the One Login process
- Test delivery of these alternatives in a pilot with low-connectivity or older populations (e.g. rural tenants, the long-term unemployed)

2.7 Privacy, transparency and trust

The BritCard is in part aimed to serve a community that has historically been neglected and mistreated by the British government - those affected by the Windrush scandal, and the wider set of individuals who lack formal identity credentials. In general, trust in government is at a low ebb worldwide. It is essential that people can have confidence that using BritCard will not lead to their data being leaked or stolen, and that the BritCard will be used for its intended purpose and will not enable government surveillance or intrusion. The project team will therefore need to place a high premium on privacy, transparency and trust.

Recommendation:

The design and development process for BritCard should prioritise trust and transparency

- Adopt verifiable credentials or attribute-based proofs (as described above) to allow individuals to prove their status without disclosing additional personal information
- Build a clear permissions model into the app or wallet: show users what data is shared and give them control
- Include a privacy impact review in each phase gate or sprint demo
- Publish uptake and usage metrics each month to show whether ID-excluded groups are being reached and whether the system is being adopted evenly across society
- Publish transparency reports on enforcement and error rates (e.g. number of false negatives (e.g., people wrongly flagged as not having the right to work/rent), civil penalties issued, errors...) to build public legitimacy especially in light of Windrush and eVisa concerns
- Avoid creating a new centralised database created bringing together all of the information relating to each citizen. Instead, a federated data architecture could be designed such that data would continue to be stored by the organisation that generated it. Relevant records could be combined when needed, with consent of the data subject, for specific purposes (for instance, the user could consent to the right-to-work credential issuing service consulting their record in the HM Passport Office database)
- Make use of sophisticated encryption techniques such as public-private key and zero-knowledge
 proofs can be used to share or verify specific attributes without sharing or copying the underlying
 data. This means that a user can, for instance, grant the Home Office permission to share the fact
 that they have the right to work in the UK, without needing to make a copy of their visa, or give the
 verifying party access to any of their other information

Effective delivery of the BritCard will require cross-government, cross-departmental buy-in and collaboration, not only for the necessary infrastructure to be in place but also to ensure alignment with the broader Digital ID programme in progress.

Recommendation:

Cross-government alignment on the direction of travel for DigID will be crucial. This will require relevant parties to:

- Agree a digital identity strategy at the Digital Interministerial Group with Home Office involved as an extraordinary member
- The creation of a DG level working group on Digital ID policy, with representatives from all relevant departments
- Hire a very senior, high-profile and experienced political figure head or tech sector professional to be the cross-government champion and external face of its digital identity programme

End notes

¹ Labour Together poll, February 2025

² Migration in the Age of Insecurity, Cooper et al, Labour Together, 2024

³ https://www.facebook.com/historingabritania/, accessed 16 May 2025

⁴Unauthorised migration in the UK, Migration Observatory

⁵ Authors' calculations based on Home Office migration statistics. Failure to meet bail conditions reported by The Telegraph

⁶ https://www.instituteforgovernment.org.uk/article/comment/windrush-scandal-was-failure-law-policy-politics-andbureaucracy; https://assets.publishing.service.gov.uk/media/5e74984fd3bf7f4684279faa/6.5577_HO_Windrush_Lessons_ Learned_Review_WEB_v2.pdf

⁷ Labour Together poll of 1912 people, 26-28 February 2025

⁸ https://www.gov.uk/government/news/pat-mcfadden-vows-to-make-the-state-more-like-a-start-up-as-he-deploys-reformteams-across-country

⁹ Home Office, Employer Awareness of, and self-reported compliance with, Right to Work checks (April 2025)

¹⁰ Recruitment & Employment Confederation, REC campaigning leads to permanent introduction of digital right to work checks (2021)

¹¹ Gov.UK, <u>UK Wide blitz on illegal working</u> (2025)

¹² Immigration Enforcement increased the number of visits to combat illegal working by 50% 2023-24; there was a further increase in illegal working activity between July 2024 and January 2025. In both cases, increased enforcement activities delivered an increase in arrests and penalties that was more than commensurate, indicating that there is significant non-compliance yet to be tackled.

¹³ Home Office Employer's Guide to Right to Work Checks (2025) runs to 70 pages and there is a thriving compliance industry

¹⁴ Home Office, <u>Employer Awareness of, and self-reported compliance with, Right to Work checks</u> (April 2025). The same study showed that risk of accidental non-compliance was also markedly higher for small businesses.

¹⁵ Immigration Compliance, <u>Successful Cases</u> (accessed 20 May 2025)

¹⁶ One Login is the Government's identity verification platform: <u>https://www.sign-in.service.gov.uk/</u>

¹⁷ https://www.gov.uk/government/publications/guide-to-the-renters-rights-bill/guide-to-the-renters-rights-bill#private-rentedsector-database

18 https://www.gov.uk/government/publications/a-blueprint-for-modern-digital-government/a-blueprint-for-modern-digitalgovernment-html

¹⁹ As it stands, the Government does not even publish an estimate of the size of the undocumented population in the UK. The Pew Research Centre, quoted <u>here</u> by the Migration Observatory estimated in 2017 that it could be between 800,000 and 1.2 million

²⁰ While it is hard to predict the behavioural effects of the new digital right-to-work and right-to-rent credential, there is some evidence that more comprehensive documentation requirements can encourage illegal migrants to leave. In the United States, state-level measures encouraged inter-state mobility. When Arizona introduced tougher enforcement measures - such as around employment verification - illegal migrants from Mexico migrated from Arizona, but not back to Mexico. Instead they went to other states such as California or New Mexico. The percentage of Mexican migrants increased by 2 per cent between 2004 and 2007, but fell by 2 per cent from 2007 until 2011 following the introduction of the Legalised Arizona Workers Act which introduced a universal 'e-verify' mandate that applied to employers across the public and private sectors. See https://docs.iza.org/dp10685.pdf

²¹ Businesses using self-employed workers aren't currently liable if a contractor turns out to be working illegally, but if the proposed changes go ahead, these employers would need to carry out checks on all individuals they engage, regardless of employment status. The law on preventing illegal working is set out in the Immigration, Asylum and Nationality Act 2006 will need to be amended, as set out here. Currently, companies are only required to carry out such checks on individuals they employ under a contract of employment, service or apprenticeship, or if the company holds a <u>Home Office sponsor licence</u>.

²² Imputed from Immigration Enforcement Data (2024) - number of companies divided by annual level of enforcement activities and number of landlords divided by number of right to rent fines.

²³ JCWI, Passport Please: The impact of the Right to Rent checks on migrants and ethnic minorities in England (2017)

²⁴ UK Nationals without a passport and/or in a lower socioeconomic position can face similar barriers in the right to rent space, as evidenced by the Home Office's 2023 <u>Right to Rent scheme: Phase two evaluation</u>. 14% of landlords surveyed said that they would not rent to a UK national without a passport, and 38% reported not wishing to rent property to Housing Benefit or Local Housing Allowance (LHA) recipients.

²⁵ The Windrush scandal has been well-documented, for instance in this piece by Amnesty International <u>https://www.amnesty.org.</u> <u>uk/resources/windrush-scandal-then-and-now</u> ²⁶ Labour Together polling, January 2024

²⁷ For instance, in this briefing

²⁸ Dr Charlie Harry Smith sets out a comprehensive history of identity in the UK in his thesis, A liberal political philosophy of British digital identity systems <u>https://ora.ox.ac.uk/objects/uuid:23ec2196-f598-4704-a251-ef97672184d9, accessed 23 May 2025</u>

²⁹ One of the founders of the Government Digital Service, Richard Pope, sets out a vision for doing this across the public sector in his book, <u>Platformland</u> (2024)

³⁰ https://www.gov.uk/government/publications/performance-review-of-digital-spend/performance-review-of-digital-spendenabling-strategic-investment-and-innovation

³¹ It should follow the approach set out in <u>The Radical How</u>, by another two GDS co-founders, Andrew Greenaway and Tom Loosemore

³² These are primarily in the Immigration, Asylum and Nationality Act 2006, the Immigration Act 1971, and the Immigration Act 2016

³³ The Migration Observatory, <u>Migrants' experiences of the UK immigration system</u> (Nov 2024)