Summary

The ADVP warmly welcomes the clarity and substance of the TBI Digital ID Policy Paper of 24 September 2025. Its research into public attitudes provides an invaluable foundation for shaping policy. While this note highlights points of agreement and areas for refinement, our perspective — as you would expect from the commercial sector — is rooted in the realities of implementation and delivery. It is from this lens that we offer our companion analysis.

Our recommendations are for a public and private sectors to work together harnessing existing processes and enabling consumer choice. We share TBI's central conclusion that digital identity is a national priority, essential for public trust, social inclusion, and the safe evolution of AI.

Where we refine the argument is in calling for a stronger role for the private sector to innovate and deliver securely at pace. **UK identity companies already perform over 1.2 billion checks globally** each year. We are mobilised and ready to realise the economic dividend of the UK's Data (Use and Access) Act — a world-first reform **projected to generate £10 billion to the UK economy over the next decade**. This thriving sector is not theoretical; its operational now, its exporting now, and is a genuine UK success story.

UK ID Implementation Options at a Glance

Option	Description	ADVP View	Risk
1. eVisa Replacement	Upgrade eVisa to a digital credential for Right to Work/Rent.	Strongly support as a quick win. Available NOW in the private sector	Low
2. eVisa + Passport Holders	Extend credentials to passport holders for banking/age checks.	Limited value; duplicates private sector.	Low
3. Mandatory National ID	Universal government-issued ID for all residents.	Strongly oppose; costly (£2bn+) and politically toxic.	High
4. Optional Private Sector ID	Allow private sector to issue optional IDs, including for non-passport holders.	Scalable immediately, inclusive, £120m cost if industry-lead.	Low

We agree with TBI that public concerns around privacy, exclusion, and compulsion must be taken seriously. For this reason, we strongly caution against a mandatory ID scheme. Not only is it politically sensitive, but it also carries over £2billion implementation costs not covered in TBI estimates to date. It also risks repeating past injustices such as the Windrush scandal.

In contrast, **Option 1 (eVisa upgrade)** and **Option 4 (private sector-led optional IDs)** are practical, deliverable, and aligned with both public attitudes and industry readiness. Together they provide a pathway that is inclusive, scalable, and cost-effective.

On wallets, ADVP diverges most clearly from TBI. While TBI emphasises interoperability and standards, we caution that restricting government credentials solely to the GOV.UK Wallet creates a bottleneck, delaying benefits and raising costs. By 2026, at least a dozen private wallets will be market-ready across banking, conveyancing, employment, and social care. **Multi-wallet optionality** will accelerate delivery, reduce taxpayer burden, sustain investor confidence, and — crucially — give individuals the choice that public opinion consistently demands.

In short, the ADVP position is pragmatic and delivery-focused in support of the Government's policy agenda. We recommend:

- Proceed with Option 1 as an incremental improvement. Let the private sector deliver this NOW
- Develop Option 4 (voluntary IDs) in partnership with the private sector,
- Avoid Option 3 (mandatory ID), which carries significant financial, political, and social risks.
- Reconsider GOV.UK Wallet exclusivity: enabling private wallets to deliver faster results

Opportunity

The Data (Use and Access) Act 2025 is a global first, giving individuals the legal right to own and control their own data.

The UK private sector has already responded, conducting 1.2 billion identity checks worldwide each year, creating jobs and export income for the UK.

The Data Act's impact assessment forecasts that the reforms will generate £10bn for the UK economy over the next decade, while underpinning safe AI and digital trust.

Building on the Data Act, there is an opportunity to strengthen the UK's global leadership by introducing government-issued digital credentials available in the private digital wallets of an individual's choice.

Implementation Options

1.	eVisa Replacement	
		o Replace current eVisa system with a government digital credential.
		o Simplifies Right to Work and Right to Rent checks.
		o Builds naturally on veterans' cards and mobile driving licences.
		Risk: Low.
		Benefits: Evolves eVisa system and meets immediate government policy agenda. Credential converted into Private Wallets available NOW - the private sector is already delivering this capability. Requires Government endorsement to scale.
2.	**eVisa + Passport Holders**	o Extend credentials to both eVisa and passport holders.
		o Facilitates easier proof of identity (e.g., banking, age verification).
		Risk: Low.
		Benefits: Questionable - private sector already can issue secure digital IDs based scanning physical passport NFC chips.
3.	**Mandatory National Digital ID**	o Government-issued ID for every UK resident.
		Risks:
		a) High political resistance (historic opposition to ID cards).
		b) Based on the costing of the Australian system extrapolated to the UK, cost would be £1.25 billion UK + additional implementation costs for excluded and vulnerable populations.
		c) Minimum Digital Inclusion Costs for State IDs: ~8m UK residents (13.5%) do not hold passports. Passport Cost: £94.50 for 8m = £756m implementation cost minimum (over £2bn in total)
		d) Risks undermining private sector investment in the Digital Identity and Attributes Trust Framework (DIATF), slowing delivery of Data Act benefits.
		Benefits: Outside of immigration wider intent of the policy is unclear and, where known, these can be delivered by other options

4	Optional ID via Private Sector	o	Government enables private sector to issue digital IDs for those without passports, at varying levels of assurance.
		o	**Risks:** Lower, as private sector is already mobilised and processing at scale.
		o	**Benefits:**

       a) Mitigates exclusion without cost/social resistance of mandatory scheme.

       b) Private sector capacity already proven (1.2bn IDs annually).

       c) Accelerates delivery of policy objectives, sustaining industry confidence and growth.

       d) Voluntary using existing digital inclusion solutions appx £15 per person without passports. Assume full 8 million apply £120m

GOV.UK Wallet – Critical Consideration

Current government policy proposes that credentials are only available in the GOV.UK Wallet.

- **Risks of this approach:**
  - o Creates a single point of dependency, putting industry delivery on the critical path of government wallet development.
  - o Costs escalating; timelines slipping.
  - o Delays undermine expected financial and economic benefits.

- **Alternative approach:**
  - o Allow credentials to be stored in any certified wallet (public or private).
  - o By 2026, at least a dozen private wallets (generalist and sector-specific) will be market-ready, developed by ADVP members.
  - o Optionality would:
    - ▪ Accelerate delivery of government policy goals.
    - ▪ Reduce taxpayer costs.
    - ▪ Lower social resistance by giving individuals choice.
    - ▪ Enable the private sector to continue innovating (e.g., in conveyancing, financial services, employment, and social care).

Recommendation

1. Proceed with Option 1 as a low-risk, incremental step to improve the current eVisa system. The private sector is already delivering this capability NOW. Requires government endorsement.

2. Explore Option 4 in partnership with the private sector to expand access and overcome exclusion, ensuring speed, scale, and cost-effectiveness.

3. Avoid Option 3 (mandatory ID), which carries significant financial, political, and social risks.

4. Reconsider GOV.UK Wallet exclusivity: enabling multiple wallets will deliver faster results, at lower cost, and with higher public and private sector support.

Comparison Table: TBI vs. ADVP

Section	TBI Position	ADVP Commentary (Agree / Refine / Disagree)
Executive Summary	Digital identity is a strategic national priority for trust, inclusion, and efficiency.	Agree: Strong foundation. Refine: Add £10bn Data Act impact & 1.2bn ID checks. Disagree: GOV.UK Wallet exclusivity risks.
Case for Action	Digital identity enables efficiency, trust, and social inclusion.	Agree: Central case stands. Refine: Data Act is a world first enabling new markets.
Option 1: eVisa Replacement	Evolutionary step, improves Right to Work/Rent.	Agree: Low-risk and logical. Refine: Should be first priority.
Option 2: eVisa + Passport Holders	Feasible and low risk, extends coverage.	Agree: Technically correct. Disagree: Adds little beyond private sector provision.
Option 3: Mandatory National ID	Possible long-term option, but high political and social risks.	Agree: Recognise risk. Refine: Quantify – 8m without passports, £1.2bn+ cost. Disagree: Strongly oppose; risks investment flight.
Option 4: Optional Private Sector-Led ID	Valuable role for private sector alongside government schemes.	Agree: Private sector essential. Refine: Already 1.2bn IDs annually. Disagree: Should be primary delivery pillar.
Wallet Strategy	Wallets important; focus on standards, interoperability, and trust.	Agree: Wallet design central. Refine: GOV.UK exclusivity = delays & costs. Disagree: Call for multi-wallet plurality.
Risks	Social resistance, exclusion, political headwinds.	Agree: Valid risks. Refine: Add investor confidence collapse risk. Disagree: Mandatory ID & GOV.UK exclusivity not viable.
Recommendations	Explore multiple options, with caution on mandatory ID.	Agree: Need careful policy. Refine: Prioritise Option 1 + Option 4. Disagree: Avoid Option 3, reject GOV.UK exclusivity.

Who are we

Association of Digital Verification Professionals (ADVP) represents registered Digital Verification Service Providers. Collectively, our members conduct 1.2bn ID checks globally per annum including most of the Right to Work, Right to Rent, DBS, and age assurance checks in the UK.

Our members are pioneering alternative business models to support true personal data sovereignty and portability — including research into vouching, not-for-profit holder services in Scotland, and the development of mutually owned data cooperatives in the North of England.

What we bring to the Government's agenda is the ability to innovate and deliver with agility — alongside a deep awareness of the risks and security considerations involved.

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