



**Submission to
Home Affairs Select Committee**

**Harnessing the potential of new digital forms of identification
August 2025**

1. In its Call for Evidence, the Committee asks whether “*government-issued digital identification [would] need to be mandatory to realise [any] benefits?*” (Q2b).
2. We raise two related concerns in response to this question regarding (a) inadequate focus on harms; and (b) transfer of control. These arise in the specific context of the Home Office eVisas system, though it may be that they have wider relevance. We draw particular attention to these concerns in view of their seriousness and our experience of failure to adequately consider or address them. Our doing so should not be taken to indicate we have, or would have, no other relevant concerns relating to digital identification.¹

(a) inadequate focus on real or potential harms

3. First, it is important to consider any harms of mandatory digital identification systems. Even if a mandatory system is considered to be necessary, useful, or preferable for achieving a specific benefit, effective evaluation of such a system and its merits must include assessment of harm. In such evaluation, as a matter of principle, harms may outweigh benefits. Amnesty UK is concerned, for example, that the Home Office has adopted a mandatory digital identification system in the immigration system (eVisas) without giving real and effective consideration of harm. The assumption appears to be that any harms can be mitigated, rather than assessing the real nature and extent of such harms and then evaluating whether any potential mitigations are real, effective, and adequate.

(b) transfer of control from individual to State and/or its operating system

4. Second, in connection with the first question, it is especially important to consider the matter of control. In adopting a mandatory digital identification

¹ We have, e.g., set out other concerns in the correspondence and briefing referred to elsewhere in this submission.

system, the Home Office has removed control from the individual over proof of their identity, and the entitlements and eligibilities that come with that.² Amnesty UK is concerned that this has been done without adequate reflection on this matter of control. Concerns that we first raised with the department in June 2021³ and raised again with the department in June 2024,⁴ and which we are aware others have raised, have consistently been met with assurances that the department will manage the system well – will build-in contingencies for error; and maintain safeguards against break down or interference with the system.

5. Alongside these assurances, the department has emphasised its view that the system will benefit users, including those dependent on it to establish their identity and status. Thus, it emphasises that its system will be more secure for the user than their previous documentary identification (e.g., status papers, passports with stamp, biometric residence cards), each of which it points out may be damaged, lost, or stolen. It is striking that the department's responses to us recognise little of the risk and reality that digital systems and the data they contain may be damaged, lost, or stolen.
6. More importantly, the department fails to consider or address that control over whether an identification system is in some way damaged or interfered with – and hence inaccessible, inaccurate, or misused – is, in the case of a digital-only system, ultimately in the hands of the system (and its processors and controllers). That contrasts with the case of a document-based system, where control is in the hands of the person holding the document. The digital-only system is not even, on its face, more secure for a person at risk of exploitation, enslavement or other control (such as victims of domestic slavery or domestic abuse) if an abuser may as readily control a person's access to a digital system as to their documents.
7. There are various other concerns relating to digital identification systems, whether mandatory or optional. However, we wish to emphasise for the Committee this matter of control.
8. Given the extent of basic social engagement, in addition to immigration powers, which are all dependent on immigration status, we have especially profound concerns about the impact of eVisas in removing control from the individual over their capacity to prove their identity, status, and various rights. The prospect that any error in the system may not be known to the individual before they experience

² This is a key concern identified in Amnesty UK's November 2024 briefing, *eVisas replacing physical status documents*, which is available [here](#).

³ See our letter of June 2021, which is available [here](#).

⁴ See our letter of June 2024, which is available [here](#).

serious harm compounds these concerns. The individual's capacity to rectify error after the event may be compromised if the system will not confirm the person's status and rights. The indication of error may even arise only in the course of action against the individual that is based on the error – such as the Home Office detaining and/or seeking to remove someone from the UK – with the all too real possibility of a defensive reaction to any attempt to correct the error.

Conclusion

9. In our view, eVisas have transferred far too much power from individuals over their lives. While there may be benefits of this, the real or potential impact upon the individual of something going wrong is so great as to clearly outweigh this. Were eVisas not mandatory – in the sense that there was still documentary evidence provided to someone of their identity and status – some different assessment of pros and cons could be made. More generally, it appears that the commitment to a digital-only system in eVisas has from the start been too sanguine about risks and mitigation, seemingly driven by a belief in the benefits and a determination to realise them to the exclusion of any possibility that harms may be too great and/or mitigation inadequate.