

ACS Submission: Making public services work for you with your digital identity

To be submitted via online form: <https://roadmap-for-modern-digital-government.campaign.gov.uk/digital-id-consultation/>

Chapter 3.3: Utility in the wider economy

Q1. To what extent do you agree or disagree that the private sector and third parties should be able to use the digital ID alongside other options?

ACS welcomes the Government's proposal that in developing a national digital ID it should be usable across both the public and private sectors alongside existing forms of identity. We support measures that can improve consumer convenience, strengthen identity assurance, and provide retailers with greater flexibility in how they verify age and eligibility.

Interoperability is important in ensuring that digital ID delivers genuine value in a retail environment. Systems must be capable of being verified quickly, reliably, and consistently across different providers and platforms, without placing additional burdens on frontline staff or wrong expectations on consumers. ACS has long supported the Proof of Age Standards Scheme (PASS), which, through its DPASS system, already provides an established interoperability solution for age verification in the retail sector.

Any digital ID solution should also be designed to integrate seamlessly with existing retail systems, including manned tills and self-checkouts. As the system is developed, Government should engage closely with retailers and technology providers to ensure it is practical and usable in real-world retail environments.

Chapter 3.4: Tackling illegal working

Q1. Are there any additional challenges not captured in the consultation that businesses would face in carrying out fully digital right to work checks for all new workers?

Many retailers operate with limited HR capacity, and many recruitment decisions are made by store managers rather than centralised teams. Any move to mandatory digital right to work checks must not transfer additional cost, administrative burden or enforcement risk onto retailers acting in good faith. In particular, where a business has correctly followed the prescribed digital process, the statutory excuse must be watertight – retailers should not be exposed to civil penalties because of failures in the underlying digital ID system, connectivity issues in-store, or ambiguity about which digital verification services are acceptable. The exceptions handling process will also need to be workable at store level without creating a parallel compliance burden.

Q2. Would any additional support not captured in the consultation be required for business to comply with fully digital right to work checks?

Yes. Clear, plain-English guidance is essential, and it must be published well in advance of mandation. Retailers need unambiguous direction on: which digital verification services are acceptable, exactly what steps constitute a compliant check, how to handle exceptions, and how to evidence compliance if challenged. We strongly support the proposed free or low-cost Government Checker – without it, retailers will be dependent on commercial DVS providers, which risks becoming a de facto cost of hiring. Guidance, training materials and the communications campaign should be developed with trade associations to ensure they reflect how recruitment actually happens in shops.