

## What to put in a wallet?

The EU Commission noted that its eIDAS regulation to ensure interoperability across (internal) borders had not had the intended impact, and so offered a 'more Europe' approach demanding provision by Member States of an e-Wallet. Questions continue as to what should go into such wallets, not least if it's for some form of money or just for 'attribute certificates'. Whilst extension to countries with population registers such as Norway or Ukraine would be designed in, the position for the UK, US or indeed anyone just visiting the EU is unclear. The loud alarms from the privacy and security cognoscenti seem to have drowned out simpler and more fundamental questions on the commercial model. What could or should happen for children is also either ill-defined or contentious.

For electronic Identity, the UK position from 2010 was that the private sector would provide for both public and private sectors, and for the next 10 years that approach slowly failed, for various reasons. When the Swiss government adopted the same basic position (without some of the show-stoppers) it was soundly rejected by plebiscite (in every canton), primarily on the grounds that whilst there was generally no objection to having a private sector option, if such infrastructure was demanded by the public sector then a public offering should be available, and available to all. But then if the public one is good then why would many people use anything else? (M6 toll road comes to mind.)

OIX has now analysed the permutations and pronounced a recommendation on e-wallets for the UK. The envisaged system or systems are vastly more complicated than a store for signed data, enabling the brewery to check and record its checking that I'm over 18 without getting any other personal details. Unsurprisingly for a group of would-be providers, it has come out in favour of the provision entirely by the private sector, with the wallets including government-issued attributes, with the government able to be able to use them. But then, in a *de facto* barrier to trade, to inbound investment and to tourism, it is also looking to the private providers to be (national-)government approved and regulated. Third party evaluation is a really good idea, as are genuine standards, and guidance has its place, but there's a big difference between providing national infrastructure and constructing a gratuitously nationalistic system going against all free trade policy since 1830, and not even in collaboration with the other country with which we share a common travel area. GDPR was and its replacement is clear that consent should not be the legal basis for the handing of personal data by monopolies such as the public sector, but all the wrapping in consent and supposed optional use will not stop the Cabinet Office Nudge Unit's heirs making any alternative too costly.

It may be helpful to consider the e-Passport, a travel document which many folk use for other purposes for want of anything else, but it's one only provided to citizens and even then by royal prerogative, not right, as it can be taken away. It's fully international, with a fiendishly complicated privacy system for readers that has to work everywhere in 10 years time and has no single points of failure, but it comes down to having some data with a *digital* signature (but not, under the legal definition, an electronic signature) whose authenticity as coming uncorrupted from an authoritative source can be checked by anyone, anywhere, offline, and without reporting its use or pay anyone to help. This (but for anyone) is exactly what is wanted for e-seals for powers of attorney, grants of probate, marriage certificates, or recent confirmation of number of points on a driving licence for hiring a car (in the UK or abroad). These would be trivial for central government to produce, and allows relying parties to transition from paper. Personal data stores aren't a novel idea, but do need something valuable to put in them.

Examination certificates, where there are more authoritative sources, call for an upgraded system for identifying organisations. Until we have these basic building blocks, why is anyone in the UK fantasising about competing with Apple and Google for e-wallets for anything beyond e-cash?