

c/o Digital ID
Cabinet Office
70 Whitehall
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consultation@digitalid.cabinetoffice.gov.uk

5 May 2026

Dear Sir or Madam,

Age UK response to the Digital ID consultation

Age UK welcomes the opportunity to respond to the consultation '*Making public services work for you with your digital identity*'. We maintain a neutral stance regarding digital ID. Our response is structured around the three principles intended to drive the design of digital ID, namely: 'useful', 'inclusive' and 'trusted'. It addresses the distinct requirements of older people, emphasising digital inclusion and considering the implications for individuals who are not online. We draw on evidence from our '*Offline and Overlooked*' campaign, learnings from Age UK's Digital Champion Programme and views of older people themselves.

- We welcome proposals for alternative routes to digital ID (a physical product, in-person support, and trusted individuals acting on someone's behalf) and would welcome further detail about how this could work in practice.
- A fully resourced digital inclusion programme, aligned with the Digital Inclusion Action Plan, should be developed alongside the digital ID initiative to reduce digital exclusion. It could include ways for people to access compatible devices, skills and confidence programmes, accessibility measures, and ongoing support.

Choice and 'offline alternatives'

Digital ID systems must not assume smartphone or tablet ownership, full connectivity or digital confidence and skills:

- 2.1 million people aged 65 and over do not use the internet.
- 4.9 million people aged 65 and over don't have the basic skills needed to use the internet successfully.
- 4.3 million people aged 65 and over in the UK don't use a smartphone.

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Assisted digital options, offline alternatives and tailored support will be required to ensure older people can continue to access vital public services regardless of their digital ability. Digital ID may help older adults by reducing fraud, improving access to government services, and lessening reliance on traditional identification. However, individuals without devices or those lacking digital skills still face significant risks, costs, and obstacles.

Accessing essential services

The consultation explains there can be challenges for people who do not hold a passport or driving licence to verify their identity. We also routinely hear from many older people about their difficulties accessing GP appointments, council services and benefits where digital processes dominate, and we have campaigned for offline routes to public services to remain through our 'Offline and Overlooked' campaign.

Adoption of Digital ID depends on people being able to use technology and trust it. Without robust safeguards, effective oversight and non-digital alternatives, there are fears that digital ID could increase exclusion and exposure to fraud. For older people, fraud and scams are a significant concern. Age UK evidence shows that 22% of older people cite lack of trust in the internet as a reason for not going online.

People are also worried about how government might use information it has about citizens, especially those who belong to marginalised groups. Clear communication, reassurance and visible accountability will be essential to prevent fear and disengagement becoming barriers to take-up.

Age UK believes genuine choice must sit at the heart of any digital ID system. We welcome the proposal that there will be no legal obligation to carry ID. However, as adoption grows, digital ID could become the default route to services, so accessible alternatives, including offline routes, must be in place from the outset.

Developing digital ID with older people in mind

Digital ID must be co-designed and tested with older people from the outset. Clearer detail on practical implementation and use of digital ID, and how this will work for older people, needs to be set out. Although inclusion, time efficiency, and fraud reduction are commendable objectives, substantial concerns persist regarding their implementation in practice.

More user-testing is needed on features that older people may struggle with, such as uploading documents or photos. Practical issues such as password management and two-factor authentication may also be complex for some users. Overcoming barriers will require ongoing resources to test solutions early and deliver support at scale.

While some older people may find digital ID makes routine tasks easier, others may find the technology burdensome and may be sceptical that it will reduce friction. Complex

authentication, multiple security steps and memory-dependent processes can create barriers for older users. An Age UK workshop participant shared their experience: *“The whole thing fills me with horror. I’ve just had to jump through umpteen hoops... I couldn’t do what they wanted me to do digitally.”*

A phased, opt-in rollout with support, in which existing documents remain valid, will allow time for users to learn and reduce the risk of sudden exclusion or disruption. One Age UK workshop participant told us: *“I do think there should be support... I want somewhere I can ring...some kind of support so I don’t get so frustrated.”*

Ensuring digital ID is ‘useful’

Older people already face barriers to accessing public services. While digital ID could speed up access and make it easier to prove identity, it would be unacceptable if people were shut out of essential services - such as claiming a pension, applying for or checking benefit eligibility, applying for a bus pass, or registering a power of attorney - because they cannot or do not want to use digital ID.

Given concerns about how personal data could be accessed or misused, the digital ID system must be designed in such a way that users are reassured that it will reduce, not increase, fraud risk with only the minimum necessary information stored and shared. Clear, secure arrangements are also needed for tightly controlled proxy access for people who cannot manage digital systems independently, with explicit authority and consent processes in place.

Benefits of the scheme will need to be communicated more clearly, particularly to people who are currently sceptical or remain digitally excluded. Working with local delivery partners with strong community insight will be essential.

Making digital ID ‘inclusive’

Inclusion must be central to the development of any digital ID system. The Cabinet Office is right to recognise that many people are excluded from digital society, whether through lack of devices, data, signal or skills, and could be further disadvantaged if they cannot use digital ID.

4.3 million people aged 65 and over in the UK do not use a smartphone. Additionally, many people who use smartphones or tablets are considered 'narrow users' - they may be comfortable with simple tasks like sending emails but often find more complex actions, such as uploading photos, challenging. People might hesitate to share personal data on a government app, compared to using the internet for seemingly more routine tasks like checking the weather.

Some groups, such as people with physical disabilities or health conditions like arthritis, stroke, or dementia, may require extra support. Even with inclusive design, compatible assistive technologies, extensive testing and compliance with accessibility standards, there will always be people who cannot use digital ID. Non-digital routes (including physical alternatives and

human support) must be available from the outset. The development of a physical card or other robust alternative access route should be considered.

Older people would benefit from targeted support to access and use digital ID, such as assisted onboarding and ongoing support, including local help from trusted individuals with guidance and training provided. Plans for digital ID must also include funded, ongoing human support for set-up and recovery. It is welcome that costs for dedicated caseworker capacity, including extended face-to-face and assisted digital support channels, are being considered early.

The rollout of digital ID may offer a chance to boost access, develop skills, provide support, and increase confidence among groups who are digitally excluded. We endorse the development of an inclusion programme and recommend its alignment with the work of DSIT and the Digital Inclusion Action Committee. In developing support models, the Cabinet Office should draw on learning from existing local and national digital support programmes. For example, learning from Age UK's Digital Champion Programme shows that older people often require sustained, trusted support, particularly for complex or sensitive tasks.

However, digital ID may not motivate participation in such schemes for those who do not see clear benefits and are wary of the risks or the rationale for introducing it.

Building 'trust'

The consultation recognises that older people may face disproportionate harm if personal data is misused, exposed or inadequately protected. Many older people are concerned about fraud and want assurance their data will be kept safe, with as little personal information shared as possible. Older people need reassurance that robust risk management, oversight and redress are in place, and that accessible support is available if issues occur.

Public confidence could also be strengthened through the establishment of an independent oversight body, with a clear role for scrutiny and public engagement. A national communications campaign should also reflect the needs of people who are digitally excluded or more cautious about the scheme.

Some older people may always require or prefer traditional approaches and existing systems. To ease concerns for those who cannot or do not wish to use digital ID, it is essential to ensure access to public services through offline routes is always guaranteed alongside inclusive digital.

Yours faithfully,

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