



Llywodraeth Cymru  
Welsh Government

## E-mail request

Our ref: ATISN 14287  
Date: 29 September 2020

Dear

### ATISN 14287

Thank you for your request which I received on 26 August 2020. You asked for the information as set out in Annex 1.

I have concluded that your refined request will still exceed the appropriate limit set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 to answer your request. Section 12 of the Freedom of Information Act allows a public authority to refuse a request if it calculates that dealing with it would exceed the appropriate limit. The appropriate limit specified for central government is £600. This represents the estimated cost of it taking over 24 hours of time to determine whether we hold the information and to thereafter locate, retrieve and extract it.

I have identified 67 digital services across Welsh Government. The information for these services is not held in one area and as such, each business owner would have to be asked to confirm whether their service involves digital ID verification (as well as any element of physical verification). I estimate it would take each business owner 25 minutes to locate, retrieve and extract any and all information that you have requested for each service (the limit would therefore be exceeded). The limit would be further exceeded in relation to a similar exercise to determine what information is held across Welsh Government where any service requires only a physical verification).

You may therefore wish to refine your request as this may help bring it to within the appropriate limit e.g. limited to only digital services in a particular business area (e.g. health or business finance support). If you do refine the question in this way, it will be treated as a new request for information.

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit  
Welsh Government  
Cathays Park

Cardiff  
CF10 3NQ

Or e-mail: [Freedom.ofinformation@gov.wales](mailto:Freedom.ofinformation@gov.wales)

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone: 0303 123 1113

Website: [www.ico.org.uk](http://www.ico.org.uk)

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely

## Annex 1

1. Please list the services that require users to verify their identity by sending in physical forms of documentation (e.g. a passport)?

1a) For each of these services, how many identities were verified in this way in your 2019/20 financial year, and what did it cost to process?

1b) Are these verifications performed by a third party or conducted by an in-house team?

2. Please list the services that allow users to use a digital method for proving their identity; and name the methods used (e.g. Gov.UK Verify or other equivalent digital biometric identity method)?

2a) For each of these services, how many identities were verified in this way in your 2019/20 financial year, and what did it cost to process?

By 'identity verification' I mean the same definition used by Government which is 'a digital identity is information used by computer systems to represent a unique person, organisation, application or device. So for a citizen or consumer, a "digital identity" is a trusted way of proving one or more attributes about themselves online or offline and the linkage of those attributes to that same person as a uniquely identifiable individual.'

On 2 September you provided the following clarification regarding your request:

I am particularly interested in the checks related to citizens, so members of the public (not employees, new recruits etc.). So, I would like to know which services require members of the public to provide ID verification. As such, your description 'services provided to the public in relation to a particular area of Welsh Government (e.g. health)' sounds right.

Additionally, for greater clarity, 'digital identity' does not include identity users inputting passwords and login information etc. The first set of questions refer specifically to members of the public providing physical documentation (such as a passport) in order to verify their ID, whilst the second set of questions refer to ID that can be verified through digital means, for example a member of the public being able to upload their passport online, enter their passport number online, enter their national insurance number online or using a digital service like [GOV.UK](https://www.gov.uk) Verify etc in order for their ID to be verified.