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## IDENTITY CHECKS

Verifying someone's identity is the most fundamental of all the employment checks. Undertaking identity checks minimises the risk of employing or engaging a person in any activity who is:

- an illegal worker
- an individual impersonating another
- avoiding the detection of a criminal offence
- an individual who has used an illegal means to obtain genuine documents to gain employment.

It should be the first check performed, as any other checks will be rendered invalid if the person's identity cannot be proved.

Identity fraud is on the increase and it is important for employers to periodically review local policies and processes to ensure they remain in line with legal requirements and new technologies, as operational standards are strengthened.

This requirements outlined within this standard are in line with Level 2 of the [HMG's Minimum Standards for the Verification of Identity of Individuals \(Version 2.0/January 2003\)](#).

### How to verify identity

Identity checks are designed to determine that the information given by the applicant is genuine; relates to a real person; and establishes that they own, and are rightfully using, that identity.

The process involves checking two elements of a person's identity:

1. **Attributable** – the evidence of a person's identity that they are given at birth (including their name, date and place of birth) and any subsequent change(s) of name.
2. **Biographical** – a person's personal history including education and qualifications, addresses, electoral register information and employment history.

The NHS uses a range of methods to check an applicant's identity:

1. Requesting original identity documents.
2. Checking the authenticity of the original identity documents.
3. Conducting a face-to-face meeting.
4. Validating personal details against external reliable sources.

## Using advances in technology

Many NHS organisations have invested in electronic ID document scanning devices to support their manual processes.

Electronic ID document scanning devices are a valuable aid to detecting fraudulent documents. There are many products on the market offering a range of different features to check the authenticity of legal documents such as passports, identity cards, driving licences etc. These devices can check text font, watermarks and other security features that can be detected under ultraviolet light.

However, they cannot, detect incidences where individuals have obtained a legitimate document fraudulently. For example, in order to take on another identity and obtain further legal documentation in that name. We would recommend that any such devices should be used in conjunction with the manual checks outlined within this document. When using these systems it is essential that a suitable training programme is provided for all staff that will operate them.

A [good practice case study](#) outlining how King's College hospital used this approach can be found on our website.

The [Centre for the Protection of National Infrastructure](#) (CPNI) is a highly credible source of knowledge and best practice; guidance can be found on their website.

## Minimum requirements

Employers should use a combination of methods to validate a person's identity and ensure that staff are suitably trained in order to satisfy themselves that the identity of all workers (including volunteers, temporary staff and contractors) has been verified.

### Requesting original documents

Individuals must provide documents containing their photograph, such as a passport, or UK photocard driving licence where available. They will also be required to provide a range of documents that confirm their current residing address and social history, such as a utility bill or bank statement.

In all cases, employers must take a photocopy or a scanned copy of each of the documents presented to them by the applicant and retain these on file. This is usually completed at interview stage by a member of the interview panel. All

photocopies or scanned copies should be signed, dated and certified by the person taking the copy.

## Validating documents

Employers must carry out all of the following checks on all documentation:

- check photographs, where available, to satisfy yourself that they are consistent with the appearance of the individual
- check that the date of birth is consistent with the individual's identity documents and the appearance of the applicant.

Further information on the copying and storing of data can be found within the 'background information' on the [NHS Employers website](#).

A list of baseline documents that we recommend should be seen, reviewed and validated as part of an identity check is provided in [appendix one](#).

Some documents are more reliable than others and only certain documents in certain combinations are acceptable for the purpose of verifying identity.

Prospective employees will need to provide one of the following combinations:

- Two forms of photographic personal identification from List 1, and one document confirming their current residing address from List 2.
- One form of photographic personal identification from List 1, and two documents confirming their current residing address from List 2.

If an individual genuinely cannot provide any forms of photographic personal identification from List 1, they should be asked to provide all of the following documentary evidence:

- Two documents confirming their current residing address from List 2.
- Two forms of non-photographic personal identification from List 3.
- A passport-sized photograph of themselves.

All documentary evidence should:

- be issued by a trustworthy and reliable source
- ideally, be difficult to forge
- if dated, be valid and current (see lists for further details)
- contain the applicant's full name, photograph and signature
- have required some form of identity check before issued to the individual.

The range of documentary evidence should aim to verify the individual's:

- photograph
- full name (including, forenames, last name, and any other name they legally wish to be known by)
- signature
- date and place of birth
- current residing address
- other biographical and social history information which may be cross-referenced.

Each of the documents provided should be from a different source. Where individuals have no other forms of photographic personal identification, photographs must be endorsed on the back with the signature of a person of some standing in their community, who has known them personally, not just professionally, for at least two years.

Further guidance about what to do if an individual cannot provide photographic documentary evidence can be found in [appendix one](#).

A list of recommended persons who can be relied upon to counter-sign photographs can also be found on the [NHS Employers website](#).

## Checking the authenticity of documents

It is not sufficient to accept the documents on face value, without undertaking all reasonable effort to verify that they are bona fide. All documents should be original and valid (in-date).

Producing original documentation to evidence address and social history has become increasingly difficult with the shift toward web-based banking and online payment of utility bills. While these documents support an individual's identity and proof of address, they are not identity documents as they do not contain any security features that can easily be checked. Given modern IT, these documents are easily obtainable and can be forged.

If applicants genuinely cannot provide original documentation, employers must make a risk-based judgment against the job role and what documentary evidence they require to seek the necessary assurances. It is perfectly acceptable to require applicants to obtain official statements from banks or utility providers, some banks will endorse online statement printouts on request. As an alternative measure, employers may choose to ask applicants to log in to online banking facilities, to verify the information provided as a printout. Any such checks should be undertaken purely for the purpose of verifying identity, sensitive financial information should remain confidential.

Documents downloaded from the internet must not be accepted in isolation and the information provided will need to be cross-referenced with other

documentary evidence gathered as part of the identity check and the employment checking process as a whole.

Further useful [guidance on document verification](#) can be found on the CPNI website.

## **Conducting a face-to-face meeting**

This is an important and integral part of the recruitment process, providing an opportunity to compare any photographic and other information provided (such as date of birth) with the likeness of the person presenting themselves. It is not sufficient to accept documents without undertaking reasonable checks to validate that they are bona fide and that the person is the person referred to in those documents.

## **Who should have their identity checks and when**

Employers should undertake identity checks prior to allowing any individual to begin any form of work or activity on their behalf, including volunteers. It is advisable to ask for proof of identity on an individual's first day of work, to ensure that the person who has presented is the person who was interviewed.

### **Existing employees**

Retrospective or periodic checks on existing employees are not usually needed. However, standards and practices used to check and validate identity are improved and strengthened over time. Employers should therefore consider the standards that have historically been applied to their existing staff and, where any new standards are significantly different, assess whether checks should be applied retrospectively.

Any retrospective identity checks must be proportionate to risk and it is recommended that checks only be repeated when suitable opportunities arise. For example, when an existing member of staff or volunteer changes roles within the same organisation, or when a periodic Disclosure and Barring Service (DBS) check is undertaken.

When recording identity checks on ESR or other HR management systems, employers should note the operational standard used at that time, so that they may easily identify when retrospective identity checks may be relevant.

When retaining a record of the checks, it is highly recommended that the individual's full legal name (as written on their passport or birth certificate) is accurately recorded alongside any other names by which the individual may be known. It is the individual's legal name that is best used as the unique identifier when undertaking any other employment checks and, as more employers record the same, the risk of mismatching records or creating unnecessary duplicates will be reduced.

## Contractors and temporary workers

The verification of identity is as much a priority for contractors and temporary workers supplied through an agency, as with permanent members of staff.

For the purpose of these standards, contractors and temporary staff are defined as individuals who are not employees of an NHS organisation but who have a direct or indirect contractual relationship to provide NHS services to that organisation. Contractors or temporary staff may be engaged to work within an NHS organisation through a third party organisation or agency.

If appointing staff from an agency or other external body to provide NHS services, employers will need to gain appropriate assurances that these providers have undertaken identity checks in compliance with this standard and that they too are keeping their operational practices up to date.

Where appointing temporary workers, employers should, as a minimum, require the individual to provide some form of personal photographic identity when they first take up their appointment.

## Individuals who have changed their name

There are many legitimate reasons as to why someone might change their name. An individual may choose to change their name at any time and be known by this name without going through any official legal process.

Employers should only accept identity documents in the applicants' previous name, if the individual is able to provide supporting documentary evidence of their name change because of:

- marriage or civil partnership (i.e. marriage or civil partnership certificate)
- divorce or civil partnership dissolution (i.e. decree absolute/civil partnership dissolution certificate)
- deed poll (deed poll certificate)
- gender reassignment (gender recognition certificate).

If the applicant cannot provide sufficient proof of their change of name, employers will need to undertake a risk assessment as to whether they should continue to consider that individual for employment or not.

In the rare occasion where a change of name cannot be evidenced, it is highly recommended that such a risk assessment is completed by a senior member of the HR recruitment team. Any assessment or decision should be undertaken in liaison with the security department.

## Prospective employees with no fixed abode

Providing appropriate documentation if an individual is officially recognised as homeless is a challenge, as having no fixed abode means they are unable to receive benefits or other accepted documents that verify their identity and social history.

If you operate schemes that support the homeless getting back into the workforce, we recommend that you refer individuals to the charity body, Crisis. This charity can help them to obtain a copy of their birth certificate or apply for a passport so that they can have some form of identity.

For further details, email [employment.services@crisis.org.uk](mailto:employment.services@crisis.org.uk).

## Refugees and asylum seekers

Refugees are people who have had a positive decision on their claim for asylum under the 1951 United Nations Convention relating to the Status of Refugees (the Refugees Convention).

The 1967 protocol removed limitations of the convention, giving it universal coverage. Individuals who do not meet the Refugee Convention's criteria for refugee status may qualify either for humanitarian protection (granted for a period of five years), or discretionary leave to remain (granted up to a period of three years).

It is important for employers to refer to the [Right to Work Check standard](#) in relation to a refugee's right to work and reside freely in the UK.

Refugees will not normally have a passport and are unlikely to have copies of other official documents, such as birth certificates or photo identity cards. When granted leave to remain in the UK, a refugee will be issued with an Immigration Status Document (ISD) by the Home Office, which will indicate their refugee status. This document can be used to verify both their identity and their right to work in the UK. They may also have a travel document, which can be accepted to verify their identity.

Further information on employing refugees can be found on the [NHS Employers website](#).

## Doubts on the authenticity of information

Countries do occasionally change their passports, so employers will need to handle any discrepancies sensitively.

If there is any doubt as to the authenticity of the passport presented by the applicant, employers should contact the Home Office to make sure the passport for that country hasn't changed. Further guidance can be found on the [UKVI](#)

[section of the gov.uk website](#), or employers can call the Employers and Education Providers helpline: 0300 123 4699.

Alternatively, employers can use their local counter-fraud service to do this on their behalf.

Where checks return information that contradicts the details provided by the applicant and raises concerns, employers should:

- proceed in a sensitive manner, there is often a reasonable explanation for apparent inconsistencies
- attempt to address any concerns directly with the applicant. Employers may wish to call them back for a second interview so that they have the opportunity to follow up with the relevant sources.

In exceptional circumstances, where checks reveal substantial misdirection, employers may feel it appropriate to report these concerns to NHS Protect or the local police.

The remit of NHS Protect is to lead on work to protect NHS staff, patients and resources from crime. It does this by providing support, guidance and direction to the NHS, enabling effective prevention, disruption and enforcement action to be taken against criminals and criminal activity. It also manages improved criminal intelligence and information flows across the health service.

Further information can be found on [the NHS Protect website](#) or by calling the fraud and corruption reporting line: 0800 028 40 60.

This document does not cover the requirements to check an individual's legal right to work in the UK.

Once employers can satisfy themselves that an individual is the person they say they are, a right to work check must be carried out. Please refer to the right to work check standard on our website.

## APPENDIX 1: EXAMPLES OF ACCEPTABLE FORMS OF DOCUMENTARY EVIDENCE FOR PROOF OF IDENTITY

The examples outlined below provide a baseline list of recommended documents that can be relied on as valid proof of identity, on the basis that the individual will have undergone some form of identity check in order for them to be issued.

This list is not exhaustive. Employers must make a risk-based judgment on what other documentary evidence they are willing to accept as providing the necessary assurances, where individuals are genuinely unable to provide the recommended documents.

### List 1: Acceptable photographic personal identification

Employers must obtain some form of photographic evidence to verify a person's identity. All photographic evidence should be compared with the applicant's likeness by conducting a face-to-face meeting. Dates and personal information should be cross-referenced with other documentary evidence provided from List 2 and 3.

All forms of photographic personal identity must be original and, if dated, must be valid and current.

Acceptable documents of photographic personal identification include:

Full, signed UK (Channel Islands, Isle of Man or Irish) passport or EU/other nationalities passport*	
UK Biometric Residence Permit (BRP) card	
UK full or provisional photocard driving licence**	
EU/other nationalities photocard driving licence (valid up to 12 months up to the date of when the individual entered the UK and providing that the person checking is confident that non-UK photocard driving licences are bona fide).	
HM Armed Forces Identity card (UK)	
Identity cards carrying the PASS (Proof of Age Standards Scheme) accreditation logo (UK and Channel Islands). Organisational identity cards are not acceptable as they do not contain watermarks, holograms or other security markings.	

\* Employers should refer to further guidance about immigration status documents in the [Right to work check standard](#).

\*\*The paper counterpart of a UK-issued driving licence was abolished by the DVLA in June 2015. Employers are no longer required to ask applicants to present the paper counterpart when an individual presents their photocard driving licence as proof of their identity. This change does not apply to photocard licences issued by the DVLA in Northern Ireland.

Where employers have a legitimate right to obtain information about entitlements and/or penalty points (endorsements) because of the nature of the role being recruited to, they can undertake a check through the DVLA's free online [share driving licence service](#). The licence holder must go online using their driving licence number, name and date of birth, and give permission for this information to be shared with a prospective employer. This will generate a temporary 'check code,' valid for 21 days, which allows the prospective employer to access any information the DVLA may hold about the licence holder.

## **What to do if the applicant cannot provide photographic documentation**

Where individuals genuinely cannot provide any form of photographic personal identity, employers should, in addition to providing a range of documents from the lists below, request that they provide a passport-sized photograph of themselves.

The photograph must be counter-signed by a person of some standing in the applicant's community who has known them personally, not just professionally, for at least two years.

A list of persons of some standing who can counter-sign photographs can be found on the [NHS Employers website](#).

The photograph must include a signed statement from that person of some standing, outlining their name, contact details, how they know the applicant (for example, GP, lawyer, teacher etc.) and the period of time they have known the applicant.

Employers will need to check that the signature provided at the back of the photograph matches the one provided in the statement.

## **List 2: Acceptable confirmation of address documents**

The primary purpose of requesting documentary evidence from applicants to confirm their address is to establish that it relates to a real property, and that the applicant actually does reside at that address. Where the applicant genuinely cannot provide the necessary documentation in their own name, for example, they

are living with family or house-sharing, employers may wish to undertake an online check using the [electoral register](#).

Recommended acceptable documents for confirmation of address may include:

Utility bill (gas, water, electricity or landline telephone), or a letter from a utility supplier confirming the arrangement to pay for the services at a fixed address on pre-payment terms. More than one utility bill may be accepted, if these are from two different suppliers. Utility bills in joint names are also acceptable (UK)*	
Local authority tax statement. For example, a council tax statement (UK and Channel Islands)**	
UK full or provisional photocard driving licence – if not already presented as a form of personal photographic identity.	
Full old-style paper driving licences (that were issued before the photocard was introduced in 1998 and where they remain current and in date). Old-style paper provisional driving licences should not be accepted.	
HM Revenue & Customs tax notification (HMRC) tax notification such as an assessment, statement of account, notice of coding**	
A financial statement such as bank, building society, or credit card statement* (UK and EEA). Statements issued outside of the EEA must not be accepted.	
Credit union statement (UK)*	
Mortgage statement from a recognised lender** (UK and EEA). Statements issued outside of the EEA must not be accepted.	
Local council rent card or tenancy agreement*	
Evidence of entitlement to Department for Work and Pensions benefits, such as child allowance, pension etc. (UK)**	
Confirmation from an electoral register that a person of that name lives at the claimed address**	

\*All documents must be dated within the last six months, unless there is good reason for it not to be.

\*\* All documents must be dated within the last 12 months.

Not denoted: this means that the document can be more than 12 months old.

## List 3: Acceptable non-photographic proof of personal identification documents

Recommended acceptable non-photographic documents may include:

Full birth certificate (UK and Channel Islands) issued after the date of birth by the General Register Office or other relevant authority, for example registrars.	
Full birth certificate issued by UK authorities overseas, such as embassies, high commissions and HM Forces.	
UK full old-style paper driving licence. Old-style provisional driving licences are not acceptable.	
Most recent HM Revenue and Customs (HMRC) tax notification, such as an assessment, statement of account, P45, P60, or notice of coding (UK and Channel Islands)**	
Work permit/residency permit (UK) valid up to the expiry date.	
Adoption certificate (UK and Channel Islands).	
Marriage or civil partnership certificate (UK and Channel Islands).	
Divorce, dissolution or annulment papers (UK and Channel Islands).	
Gender recognition certificate.	
Deed poll certificate.	
Firearms certificate/licence (UK, Channel Islands and Isle of Man).	
Police registration document.	
Certificate of employment in the HM Forces (UK).	
Evidence of entitlement to Department for Work and Pensions benefits, such as child allowance, pension etc. (UK)**	
A document from a local/central government authority or local authority giving entitlement, such as Employment Services, Job Centre, Social Security Services (UK and Channel Islands)*	

\*All documents must be dated within the last six months, unless there is good reason for it not to be, for example – where there is clear evidence that the individual was not living in the UK for three months or more.

\*\* All documents must be dated within the last 12 months.

Not denoted means that the document can be more than 12 months old.

## Recommended acceptable documents for young people who have recently left full-time education (16 – 19 year olds)

Every care must be taken to ensure that recruitment processes do not create any unintended barriers to the employment of young people. Wherever possible, employers should try to seek the type and combination of documents as described earlier in this document. However, it is recognised that this may genuinely not be possible for young people, especially those who have just left full-time education and are seeking employment for the first time.

In such cases, employers should, as a minimum, aim to seek:

1. One form of personal photographic identity:

A valid and in-date identity card carrying the PASS accreditation logo (UK, including Channel Islands and Isle of Man), such as a UK Citizen ID card or a Connexions card	
A passport-sized photograph that is counter-signed by a person of some standing in the applicant's community	

and

2. Two forms of documentary evidence from the list below:

A grant or student loan agreement from a local education authority (UK).	
A full birth certificate (UK and Channel islands) issued after the date of birth by the General Register Office or other relevant authority, for example registrars.	
A full birth certificate issued after the date of birth by UK authorities overseas, such as embassies, high commissions and HM forces.	
National Insurance card, or letter from the HM Revenues and Customs, Job Centre or Employment Services evidencing the issue of a National Insurance number.	
A letter from their head teacher, tutor or college principal (UK), verifying their name and other relevant information, for example, address and date of birth.	
A document from a local/central government authority or local authority giving entitlement such as Employment Services, Job Centre, Social Security Services (UK and Channel Islands).*	
A qualification certificate.	

\*All documents must be dated within the last six months, unless there is good reason for it not to be, for example – where there is clear evidence that the individual was not living in the UK for six months or more.

\*\* All documents must be dated within the last 12 months. Not denoted means that the document can be more than 12 months old.

## APPENDIX 2: CHECKING DOCUMENTATION FOR AUTHENTICITY

Checking document authenticity is an integral and important part of the verification of identity process. No single form of identification can be fully guaranteed as genuine and therefore the verification process must be cumulative.

Employers must make clear, in writing, to all applicants that any relevant documents will be checked for authenticity either manually, through an appropriate body, and/or by the use of an electronic scanning device.

### Passports (UK and overseas)

- Check the general quality and condition of the passport. Look out for page substitution, incorrect numbering of pages, damage to the cover or spine of the document, poor paper and print quality.
- Check that print is clear and even – print processes are deliberately complex on genuine documents.
- Check wording, issue and expiry dates – spelling mistakes are common in forged or counterfeit documents, especially on stamps and visas. Forgers often only alter the expiry date, so ensure this corresponds with the issue date.
- Check for damage – accidental damage is often used to conceal tampering, so treat any excessive damage with caution.
- Check photographs for signs of damage or for excessive glue – this could indicate photo substitution. An excessively large photograph may be hiding another photograph underneath. There should be an embossed strip embedded into the laminate, which will catch a portion of the photograph.
- Check watermarks can be clearly seen when holding the document up to the light.
- Check the name of the country of origin. Unofficial travel documents in the name of non-existent countries, or countries no longer known by their original name, are in circulation.

### Biometric residence permits

Employers will find it useful to refer to general guidance available on the [UK Visa and Immigration \(UK VI\) website](#).

UK Visas and Immigration (UK VI) also provides a [useful online tool](#) for checking an applicant's biometric residence permits.

## Photocard driving licences

Photocard driving licences contain similar security features to those present in passports.

- Examine the licence carefully, looking for any damage or adjustments.
- Ensure the printed details have not been changed.
- Check watermarks and security features are intact.
- Photographs will always be in greyscale, check this matches the applicant.
- Check the biographical details (i.e. name, date of birth) match the details of the applicant.
- Ensure the 'valid to' date is the day before the owner's 70th birthday (if the owner is over 70 this does not apply). Cross reference the valid to date with the applicant's date of birth, which appears in Section A of the counterpart document.
- Where employers have a legitimate right to obtain information about entitlements and/or penalty points (endorsements) because of the nature of the job they are recruiting to, and they have sought the licence holder's permission to access information using the DVLA's free [online share driving licence service](#) (not available for licence holders in Northern Ireland), employers should cross-reference any information provided online with the information provided in the photocard licence.

## Old-style paper driving licences

- Remove the document from the plastic wallet and check it is printed on both sides. It should have a watermark visible by holding the licence up to the light and there should be no punctuation marks in the name or address.
- Ensure the 'valid to' date is the day before the bearer's 70th birthday (unless the bearer is already over 70). The valid to date can be cross-referenced with the applicant's date of birth, which appears on other verification ID.

## UK firearms licences

- Check the licence is printed on blue security paper with a Royal crest watermark and a faint pattern stating the words 'Home Office.'
- Examine the licence for evidence of photo tampering or any amendment of the printed details, which should include home address and date of birth. The licence should be signed by the holder and bear the authorising signature of the chief of police for the area in which they live, or normally a person to whom his authority has been delegated.

## HM Armed Forces identity cards

- Check the card for any tampering or alteration of the printed details.
- HM Armed Forces identity cards must be surrendered upon leaving the Armed Forces, therefore only those individuals who are currently serving in the Armed Forces will hold a card.

## UK Citizen photocard

- Check the card has the PASS (Proof of Age Standards Scheme) hologram. This signifies the card is genuine and is recognised as valid ID under the law.
- The colour photo confirms the person presenting the card is the lawful holder.
- Every Citizen Card displays ultra-violet markings in the form of two '100% proof' logos.

## Birth certificates

Birth certificates are not wholly reliable for the purpose of verifying a person's identity, as copies may be easily obtained. Certificates that are issued shortly after the time of birth are more reliable than recently issued duplicates, as these will not show if any information has been corrected or superseded by a new registration.

Duplicate copies issued by the General Register Office will state 'certified copy' on the birth certificate.

- Check the quality of the paper used. Genuine certificates use a high grade.
- If the document is held up to the light there should be a visible watermark.
- Check the certificate format used is in the format for the year of registration.
- Check the surname only is entered in upper case and not the forename(s).
- Any signs of smoothness on the surface may indicate that original text has been washed or rubbed away.

- There should be no signs of tampering, changes using liquid paper, overwriting or spelling mistakes.
- Ensure the date of birth and registration/issue dates are provided. The date of birth should be shown with the day and month in words and the year in figures.
- Check the name and date of birth given in the application for match those given in the birth certificate.

Further guidance on checking birth certificates is available [on the Identity and Passport Service website](#).

## Other supporting documents

Documents such as utility bills and bank statements support an individual's identity and proof of address but they are not identity documents in themselves. Modern IT and the internet mean that these documents can be easily obtained or forged and they do not have many security features that can be easily checked. The following checks will help to identify any inconsistencies or anomalies:

- Check the document is on original, quality, headed paper. Pay particular attention to the company logo, as logos lose their quality when photocopied or scanned.
- Check for even folds on original documents, the vast majority of bills are machine folded before being sent to customers.

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