

Verification of identity checks

September 2012

About the NHS Employment Check Standards

This document outlines the verification of identity checks that NHS organisations (across England) must be aware of, and act on, in the appointment and ongoing employment of all individuals in the NHS. It is one of a set of six documents that make up the *NHS Employment Check Standards*.

The NHS Employers organisation has developed these standards with the Department of Health and employers in the NHS. The standards include those that are required by law, those that are Department of Health (DH) policy and those that are required for access to the NHS Care Record Service.

These standards replace all previous guidance issued by NHS Employers on safer recruitment and include the employment checks that NHS organisations must carry out to meet the Government's core standards, outlined within the *Standards for Better Health*. Since April 2010, all NHS providers (whether NHS organisations or private providers) have been required to register with the Care Quality Commission (CQC). Organisations registered with the CQC are required to comply with the Health and Social Care Act 2008 (Regulated Activities) Regulations 2010 and the Care Quality Commission (Registration) Regulations 2009, in particular, the requirements relating to the recruitment of staff. NHS providers should show evidence of compliance with the *NHS Employment Check Standards* as part of the CQC's annual regulatory framework.

Failure to comply with these standards could potentially put the safety and even the lives of patients, staff and the public at risk.

The NHS Employment Check standards apply to all applicants for NHS positions (prospective employees) and staff in ongoing NHS employment. This includes permanent staff, staff on fixed-term contracts, volunteers, students, trainees, contractors, highly mobile staff and staff supplied by an agency. Trusts using agency, contractor or other external bodies to provide NHS services must ensure, through regular audit and monitoring, that their providers comply with these standards.

Avoiding discrimination

Employers must not unlawfully discriminate in their recruitment processes on the grounds of ethnicity, disability, age, gender, religion and belief, or sexual orientation. To avoid discrimination employers must treat all job applicants in the same way at each stage of their recruitment process.

Recording and protecting data

NHS employers must carry out all checks in compliance with the Data Protection Act 1998. Information should only be obtained where it is essential to the recruitment decision and kept in accordance with the Act. Employers must record the outcome of all pre-employment checks, using the Electronic Staff Record (ESR), where available, or an alternative HR management system. These checks are also part of the information governance and assurance standards linked to the use of the NHS Care Record Service (NHS CRS). For more details visit www.connectingforhealth.nhs.uk/systemsandservices/scr

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Introduction

The Centre for the Protection of National Infrastructure (CPNI) sees identity verification as the most fundamental of all pre-employment checks. It should be the first check performed and an application should not progress until the employer is satisfied that a person's identity is proven.

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, place of birth, parents' names and addresses).
2. **Biographical:** a person's personal history including registration of birth, education and qualifications, electoral register information, details of taxes and benefits paid by or to the person, employment history, interactions with banks and utilities providers.

Biometric identity – such as fingerprints, voice, retina and DNA – is not a required part of the NHS verification of identity checks.

This document does not cover the requirements to check an individual's legal right to work in the UK. Once an employer is satisfied that a prospective employee is the person they say they are, a right to work check must be carried out. Please refer to the Right to work checks document of the *NHS Employment Check Standards*.

Verification of identity

Verification of identity checks are designed to:

- determine that the identity is genuine and relates to a real person
- establish that the individual owns and is rightfully using that identity.

The NHS uses two methods for verifying identity: requesting original documents and checking an individual's personal details against external databases.

Original documents allow you to check an employee's:

- full name – forenames and last name
- signature
- date of birth
- full permanent address.

Prospective employees must provide acceptable documents containing their photograph, such as a passport or UK driving licence, and acceptable documents providing their current address. A face-to-face meeting is also an essential part of the verification process.

Employers must record the outcome of the checks using the Electronic Staff Record (ESR), where available, or an alternative HR management system, confirming that identity has been verified in accordance with these standards.

Acceptable personal identification documents

Some documents are more reliable than others and only certain documents, in certain combinations, are acceptable for verification of identity.

Prospective employees will need to provide either of these two combinations:

- two forms of photographic personal identification and one document confirming their address; or
- one form of photographic personal identification and two documents confirming their address.

All documents from each of the lists below must be valid, current and original. Photocopies and documents downloaded from the internet (e.g. bank statements) must not be accepted. Official copies of original documentation may be accepted where signed by a solicitor.

Where identity documents are provided in a foreign language, an independently verified translation must be obtained. Identity documents of a foreign equivalent must not be accepted if listed as 'UK' on the list of acceptable forms of identification.

At least one document must show the individual's signature, where a signature has not previously been provided, for example because of an e-application the individual should be asked to provide it at interview for checking against relevant documentation.

All documents provided must be photocopied and retained on file. The person taking the copy must sign and date the copy to show it has been certified.

List of acceptable photographic personal identification

Acceptable documents of photographic personal identification include:

- UK (Channel Islands, Isle of Man or Irish) passport or EU/other nationalities passport
- passports of non-EU nationals, containing UK stamps, a visa or a UK residence permit showing the immigration status of the holder in the UK*
- UK full or provisional photo-card driving licence (must include paper counterpart); or an EU/other nationalities full photo-card driving licence (providing that the person checking is confident that non-UK photo-card driving licences are bona fide)
- ID cards carrying the PASS accreditation logo (UK) for example a UK Citizen ID card. This card can be applied for by residents of the UK and is verifiable with similar security marks to passports and driving licences.
- an EU national ID card and/or other valid documentation relating to immigration status and permission to work – a current Biometric Resident Permit (formerly the Identity Card for Foreign Nationals) is acceptable*.

A UK HM Forces photo ID card is acceptable but employers should bear in mind that such cards must be surrendered upon leaving the forces so only those individuals currently in the forces will hold such a card.

Any other document that is not listed above (for example, organisational ID card) must not be accepted.

*For further information on immigration, please refer to the Right to work checks document of the NHS Employment Check Standards.

What to do if no acceptable photographic personal identification documents are available

If an individual seems genuinely unable to provide any acceptable photographic personal identification, then employers should request each of the following:

- two forms of non-photographic personal identification
- two documents confirming their address
- a passport-sized photograph of themselves.

All documents must be from a different source and photographs must be endorsed on the back with the signature of a 'person of standing' in their community, who has known them for at least three years. A 'person of standing' may be a magistrate, medical practitioner, officer of the armed forces, teacher, lecturer, lawyer, bank manager or civil servant.

The photograph should be accompanied by a signed statement from that person, indicating the period of time that the individual has been known to them. Always check that the signature on the statement matches with the one on the back of the photograph and that it contains a legible name, address and telephone number.

A copy of each of the documents should be taken and retained on file. All copies should be signed, dated and certified by the person taking the copy. It is good practice to contact the signatory to authenticate the details of the statement.

List of acceptable confirmation of address documents

Acceptable documents for confirmation of address include:

- utility bill (gas, water, electricity or land-line telephone), or a certificate from a utility supplier confirming the arrangement to pay for the services on pre-payment terms at a fixed address. More than one utility bill may be accepted if these are from two different suppliers and utility bills in joint names are also permissible*
- local authority tax bill (i.e. council tax)**
- UK full or provisional photo-card driving licence (must include paper counterpart); or a full old-style paper driving licence (if not already presented as a personal ID document). Old style provisional driving licences are not acceptable
- most recent HM Revenue & Customs tax notification (i.e. tax assessment, statement of account, notice of coding)** a P45 or P60 is not acceptable
- financial statement (for example, bank, building society, credit card or credit union statement) containing current address*
- mortgage statement from a recognised lender**
- local council rent card or tenancy agreement*
- benefit statement, book or card; or original notification letter from Department of Work and Pensions (DWP) confirming the rights to benefit (for example, child allowance, pension)**
- confirmation from an electoral register search that a person of that name lives at the claimed address*.

List of acceptable non-photographic proof of personal identification documents

Acceptable non-photographic documents include:

- full birth certificate (UK & Channel Islands) issued at the time of birth, including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces
- full birth certificate (UK & Channel Islands) issued after the time of birth by the General Register Office / relevant authority, for example, Registrars
- UK full old-style paper driving licence. Old-style provisional driving licences are not acceptable
- residence permit issued by the Home Office to EU Nationals on inspection of own-country passport
- adoption certificate (UK)
- marriage/civil partnership certificate (UK)
- divorce/annulment or civil partnership dissolution papers (UK)
- deed poll certificate
- police registration document
- certificate of employment in HM Forces
- benefit statement, book or card, or original notification letter from the Department of Work and Pensions (DWP) confirming legal right to benefit (for example, child allowance, pension)**
- most recent tax notification from HM Revenue and Customs (i.e. tax assessment, statement of account, notice of coding, P45 or P60 document) **
- UK firearms licence
- grant letter or student loan agreement from a Local Education Authority.

*Documents must be dated within the last three months. (Unless there is a good reason for it not to be, for example, clear evidence that the person was not living in the UK for three months or more). These documents must contain the name and address of the applicant.

**Documents must be dated within the last 12 months.

When appointing someone who has recently left school or further education, in addition to photographic personal identification, employers should ask for at least one of the listed documents below as sufficient proof of their identity:

- full birth certificate (UK & Channel Islands) issued at the time of birth, including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces
- full birth certificate (UK & Channel Islands) issued after the time of birth by the General Register Office / relevant authority, for example, Registrars
- National Insurance (NI) number card or proof of issue of an NI number (this will also be a HR requirement for employment)
- a letter from their Head Teacher or College Principal can be requested, verifying their name and any other relevant information, for example, address or date of birth.

What if the applicant has changed their name recently and cannot provide identity documents in this new name?

Employers must only accept identity documents in the applicant's previous name where they are able to provide legitimate documentary evidence of the recent name change because of:

- marriage/civil partnership
- divorce/civil partnership dissolution
- deed poll.

Annex 1: Checking documentation for authenticity

Checking document authenticity is an integral part of the verification of identity checks. No single form of identification can be fully guaranteed as genuine and therefore the verification process must be cumulative. Employers must make it clear to employees that any relevant documents will be checked for authenticity.

Passports (UK or 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 size, signs of damage or for excessive glue – this could indicate photo substitution. An excessively large photograph may be hiding another photograph underneath. There should also be an embossed strip embedded into the laminate, which will catch a portion of the photograph.
- Check that 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 nonexistent countries, or countries no longer known by their original name, are in circulation.

Visas

- Check for signs of alteration to the passport number or personal and issue details. Make sure details correspond with information in the passport.
- Check that security features, such as watermarks, are intact.
- Check image on the visa for signs of substitution.
- Check wording for evidence of alteration or spelling mistakes.

Biometric residence permits

- Check the permit number on the front of the card in the top right corner – it should start with two letters followed by seven numbers. The permit number should not be raised; it should feel smooth when you run your fingers across it.
- Photographs will always be in greyscale, check that this matches the applicant.
- Check the biographical details (i.e name, date of birth) match the details of the applicant.
- Check the security features at the back of the permit. This should be a raised design incorporating the four national flowers of the UK, which can be seen clearly by shining a light across the card.
- The permit should be the size of a credit card, it will feel slightly thicker than a drivers licence and will have a distinctive sound when flicked.

If you have concerns about the validity of a biometric residence permit, you may wish to contact the UKBA verification service at employerBRPverification@ukba.gsi.gov.uk or access the online checking service at <http://www.ukba.homeoffice.gov.uk/business-sponsors/preventing-illegal-working/support/ecs/>

Photo-card driving licences and photo identity cards

New driving licences and photo identity cards now contain similar security features to those present in passports.

- Examine the licence carefully, looking for any damage or adjustments.
- Ensure that the printed details have not been changed.
- Check that watermarks and security features are intact.
- Photographs will always be in greyscale, check that this matches the applicant.
- Check that the biographical details (i.e. name, date of birth) match the details of the applicant.

Driving licences:

- Remove from the plastic wallet and check it is printed on both sides, check that the details on the counterpart document correspond with those on the photo-card, and compare the signature.
- 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 on other verification ID.

EU National ID cards:

- Check the card for evidence of tampering with the photo.
- Check for any amendment of the printed details.

If you have concerns about the validity of a national identity card, you may wish to contact the UKBA card verification line by telephoning 0300 123 4699. Further guidance about ID cards for foreign nationals can be found on the UKBA website at www.ukba.homeoffice.gov.uk

UK CitizenCard photo-card

- Check the card has the PASS (Proof of Age Standards Scheme) hologram. This signifies that the card is genuine and is recognised as valid ID under the law.
- The colour photo confirms that the person presenting the card is the lawful cardholder.
- Every CitizenCard displays UV (ultraviolet) 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 easily be obtained. However, certificates issued at the time of birth are more reliable than recently issued duplicates. Duplicate copies issued by the General Register Office will state 'certified copy' on the birth certificate.

- Check the quality of paper used; genuine certificates use a high grade.
- When the document is held up to the light there should be a visible watermark.
- Any signs of smoothness on the surface might 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 that the date of birth and registration/issue dates are provided.
- Check that the name and date of birth given in the application form match those given in the birth certificate.

Supporting documentation

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

- Check that documents have not been printed off from online bills or statements – most companies will provide hard copies to customers on request.
- Check that the document is on original quality letterhead 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.

Advice for employers on verification of identity

- Don't take documents at face value – ensure that they are checked thoroughly. Tax documents, payslips, degree certificates and fake documentation are all available online.
- Don't check documents in isolation – cross-reference with other data supplied. If the data doesn't match, ask for further evidence.
- If in doubt that the documentation being presented is genuine, ask the individual to come back for a second interview to give you time to follow up with relevant sources.

Doubts on authenticity of information

Your checks may return information that contradicts the details provided by the applicant and raises concerns. In this situation you should:

- proceed in a sensitive manner – there is often a reasonable explanation for apparent inconsistencies
- attempt to address your concerns directly with the candidate – you may wish to call them back for a second interview so that you can follow up with the relevant sources.

For further information about checking the authenticity of European travel and identity documents visit the Public Register of Authentic Identity and Travel Documents Online (PRADO) website provided by the Council of European Union at: <http://prado.consilium.europa.eu/en/homeindex.html>

In exceptional circumstances, where your checks reveal substantial misdirection, you may feel it would be appropriate to report your concerns to the local police. If in doubt, further advice can be sought from the Home Office employers' helpline on 0300 123 4699.

Further information

Every effort is made to ensure that the requirements within these standards are updated in line with new legislation and DH policy as it comes into force. Where employers choose to download hard copies of the standards, it is essential that they regularly refer to the NHS Employers website to ensure that they are fully compliant with any updated legal and mandated requirements.

Alerts to any changes to these standards are published in the NHS Workforce Bulletin, which you can download or subscribe to at: www.nhsemployers.org/workforcebulletin

Visit www.nhsemployers.org/EmploymentChecks

Email employmentchecks@nhsemployers.org

This document uses information from the Centre for the Protection of National Infrastructure (CPNI). Visit the CPNI website at www.cpni.gov.uk for further information.

NHS Employers

The NHS Employers organisation is the voice of employers in the NHS, supporting them to put patients first. Our vision is to be the authoritative voice of workforce leaders, experts in HR, negotiating fairly to get the best deal for patients.

We work with employers in the NHS to reflect their views and act on their behalf in four priority areas:

1. pay and negotiations
2. recruitment and planning the workforce
3. healthy and productive workplaces
4. employment policy and practice.

The NHS Employers organisation is part of the NHS Confederation.

Contact us

For more information on how to become involved in our work, email getinvolved@nhsemployers.org

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