



**NHS Employers**

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# **IDENTITY CHECKS**

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## What is an identity check?

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

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

Identity fraud is increasing, 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.

## How to verify identity

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 and driving licences. 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, if an individual has fraudulently taken on another identity in order to obtain further legal documentation in that name. We would therefore 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. An introduction to identity document verification technology can be found on the [Gov.uk website](#).

# MINIMUM REQUIREMENTS

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

## Requesting original documents

Individuals must be able to provide a range of documents that confirm their name, their current address and evidence of residency.

In all cases, employers must take a photocopy or a scanned copy of each of the documents presented to them and retain these on file in line with the Data Protection Act 2018. Employers should refer to the [guidance on lawful processing](#) available from the Information Commissioner's Office (ICO), which includes information on documenting your processes.

Copying documentary evidence should ideally be completed during the interview by a member of the interview panel. All photocopies or scanned copies should be signed, dated and certified by the person taking the copy (either by hand or digitally).

## Validating documents

Employers must carry out check on:

- photographs, where available, to ensure they are consistent with the appearance of the individual presenting themselves
- date of birth, to ensure it is consistent with the individual's identity documents and the appearance of the applicant.

A list of documents that may be obtained and validated as part of an identity check is provided in [appendix one](#). These documents are recommended on the basis that they have required the individual to have some form of identity check for them to be issued in the first place and therefore can offer a greater level of assurance when presented in the combinations outlined below.

The lists in appendix one are intended to be used as a guide only.

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 form 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 being 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.

You should not accept one form of identification to confirm both an applicant's name and address – unless otherwise stipulated in appendix one. For example, if an applicant provides you with their driving licence as proof of their name, you will need to seek another form of identification to confirm their address, such as a utility bill.

Where individuals cannot provide you with any photographic personal identification, you should seek a passport sized photograph which is endorsed on the back with the signature of a person of some standing in their community. Please see the [Gov.uk](https://www.gov.uk) website for a list of recommended persons of some standing in the community who can be relied on to counter-sign photographs.

## Checking authenticity of documents

It is not sufficient to accept the documents at face value without undertaking all reasonable effort to verify that they are bona fide.

Producing original documentation to evidence address and social history has become increasingly difficult with the shift to online banking and payment of utility bills. Documents downloaded from

the internet offer the lowest level of assurance of identity given that they can be easily obtained and forged, and they do not contain any security features that can be easily checked.

If applicants genuinely cannot provide original documentation, employers may request that applicants ask their bank or utility provider to endorse and stamp the copy. Alternatively, employers may choose to ask applicants to log in to their online account while in their presence, so that they can verify that the printout is attributed to an actual account in the individual's name and residing address. If taking the latter approach, any online verification must be purely to ascertain the applicant's identity, copies of sensitive financial information should remain strictly confidential.

Documents downloaded from the internet should never be accepted in isolation and always be cross-referenced with other forms of original documents presented by the applicant.

When considering authenticity, employers may find information provided by the Centre for the Protection of National Infrastructure (CPNI) [on pre-employment screening](#) useful, as well as the [public register of authentic travel and identity documents online](#) (PRADO), which shows example images of documents and security features from European Union members and a wide array of further countries.

## Conducting face-to-face meetings

Conducting a face-to-face meeting 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 all reasonable checks to validate that they are bona fide, and the person presenting themselves is the person referred to in those documents.

Where organisations conduct the interview using video calling, such as Skype, any cross-matching of documentary evidence with a physical person should be conducted when the individual first commences their appointment.

## Who to check and when?

Identity checks should be completed before allowing an individual to begin any form of work or volunteering activity. It is advisable for employers to ask individuals to show some form of photographic identity on their first day, so that this can be cross matched with what was previously provided by the applicant earlier in the recruitment process, and they can be sure that the person presenting themselves is the person they 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 existing staff and, where any new standards are significantly different, assess whether repeat checks are necessary.

Any requirement for repeating identity checks must be proportionate to risk and should be conducted when suitable opportunities arise. For example, when an existing member of staff or volunteer changes roles within the same organisation, or when a periodic DBS check is undertaken.

When recording identity checks on the Electronic Staff Record (ESR) or other HR management systems, employers should note the operational standard used at that time, so that they can easily identify when repeat checks may be relevant.

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

### **Contractors and temporary workers**

For the purpose of these standards, temporary workers are defined as individuals who are not directly employed by an NHS organisation but who have a direct or indirect contractual relationship to provide services to that organisation through an agency, contracting company or other third-party staffing provider.

Where appointing temporary workers, the employing organisation must gain the necessary assurances from the staffing provider that the appropriate clearances, including identity checks have been conducted in compliance with the NHS Employment Check standards.

The employing organisation should make it expressly clear to the staffing provider that they will need to advise any workers they supply, that they will be required to present some form of personal photographic identity on their first day of appointment to verify that they are who they say they are.

### **Documents presented in different names**

There are many legitimate reasons as to why someone may have documents in different names, for example, through marriage, divorce, religious or professional reasons or they may prefer to be known by their middle name. Individuals may choose to change their name at any time and be known by this name without going through any legal process.

Any such information must be matched with supporting documentary evidence that recognises the name change. For example, this might include but is not exclusive to:

- a marriage or civil partnership certificate
- a decree absolute/civil partnership dissolution certificate
- a deed poll certificate
- a recognition certificate.

If the applicant cannot provide sufficient proof of their change of name as described above, employers will need to undertake a risk assessment to determine whether to confirm an unconditional offer of appointment or not. On rare occasions where the necessary assurances cannot be obtained, we would recommend that the risk assessment should be conducted with senior members of the HR recruitment and security teams any decision not to appoint is reasonable and fair.

## Obtaining proof of identity from those furthest from the jobs market

It is recognised that some groups of people will find it more difficult to meet the minimum identity checking requirements.

For a combination of reasons, this may include homeless people, refugees, asylum seekers, people with learning disabilities and others.

Where candidates are genuinely unable to provide the combination of documents suggested in this document, employers may choose to accept other forms of documentary evidence. Any decision to accept other forms of documentary evidence is down to local discretion. The type of alternative documents you might wish to consider accepting will be dependent on the risks associated with the role and what the applicant can genuinely present you with, to give the necessary assurances.

### Prospective employees with no fixed abode

Applicants who have no fixed abode are unable to open bank accounts, receive credit or claim benefits so it is highly unlikely that they will be able to present the range of recommended documents that would normally evidence their identity and residency.

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.

Further information on [employing homeless people](#) can be found on the Crisis website or by emailing [enquiries@crisis.org.uk](mailto:enquiries@crisis.org.uk)

### Refugees

Refugees are permitted to work in the UK under the United Nations Convention relating to the Status of Refugees (the Refugees Convention). Individuals who do not meet the Refugee Convention's criteria for refugee status may still 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).

When granted leave to remain in the UK, the Home Office will issue a refugee with the following documentation and these documents can be accepted to verify their identity and right to work in the UK:

- a biometric residence permit and/or an immigration status document (ISD) which clarifies their full permission to work in any job at any level
- a national insurance number.

### Asylum seekers

An asylum seeker is a person who has applied for recognition as a refugee under the Refugee Convention and is awaiting a decision on their asylum claim. The right to seek asylum from persecution is a fundamental human right to which everyone is entitled. The Home Office will issue asylum seekers with an Application Registration Card which will clearly indicate whether they are able to work in the UK or not. Where the card indicates that employment is permitted employers may accept this document as suitable evidence of their identity and right to work in the UK.



Further guidance about employing refugees and asylum seekers, their right to work and restrictions is provided in the [right to work check standard](#) which 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 [UK visas and immigration section](#) of the Gov.uk website. Alternatively, employers can call the Employers and Education Providers helpline: 0300 123 4699.

Employers can also 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 the [NHS Counter Fraud Authority](#) or the local police. Employers can also call the 24-hour fraud and corruption reporting line on 0800 028 40 60.

# APPENDIX 1: RECOMMENDED FORMS OF DOCUMENTARY EVIDENCE FOR PROOF OF IDENTITY

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Lists 1, 2 and 3 outline a range of documents which, when presented in the specified combinations, can be more accurately relied on to provide the necessary proof of an individual's identity. This is because the individual will have gone through some form of identity check in order for the document(s) to be issued to them in the first place.

The lists of documents are not exhaustive and should be used as a guide only.

## List 1: Examples of photographic personal identity documents

All forms of documentary evidence must be original and, if dated, must be valid and current, as indicated in the recommended list of documents below.

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 forms of documentary evidence the applicant has presented as part of their application.

Examples of photographic personal identity documents include:

Full, signed UK (Channel Islands, Isle of Man or Irish) passport or other nationalities passport\*

UK Biometric Residence Permit (BRP) card\*

UK full or provisional photocard driving licence. (If issued by the DVLA you are not required to see the paper counterpart. Licences issued in Northern Ireland by the DVA must be presented with the paper counterpart)\*\*

Other nationalities photocard driving licence. (Valid up to 12 months from the date when the individual entered the UK. The person checking the document must be able to assure themselves that the licence is bona fide)

HM Armed Forces Identity card. (UK)

Identity cards carrying the PASS (Proof of Age Standards Scheme) accreditation logo (issued in the UK, Channel Islands and Isle of Man only). Organisation identity cards are not acceptable as they do not contain watermarks, holograms or other security markings.

EEA government issued identity cards that comply with Council Regulation (EC) No 2252/2004, containing a biometric.

\* Guidance on immigration status documents can be found in the [right to work check standard](#) which is available on the NHS Employers website.

\*\* If presented with a UK photocard driving licence and it is relevant to the position you are recruiting to, employers may access information about any entitlements and/or endorsements by carrying out an online check using the [DVLA's share driving licence service](#) which can be found on

the gov.uk website. Permission must be sought from licence holder to access this information as they will need to go onto their account to generate a temporary code, this can then be shared with their prospective employer and used to carry out the online check. The check code is valid for up to 21 days.

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

If individuals are genuinely unable to provide any form of photographic personal identity, employers will need to ask them to provide a passport-sized photograph of themselves, in addition to providing documentary evidence from the lists below.

The photograph must be countersigned by a person of some standing in the community who has known the applicant personally for at least two years.

The person countersigning the photograph must provide a statement outlining how they know the applicant (for example, as their GP, solicitor, or teacher) and the period of time they have known them. They must also provide their full name, signature and contact details. Employers should cross-reference the signature provided at the back of the photograph with the one provided in the statement to ensure it matches.

A list of recommended persons of some standing in the community can be found on the [Gov.uk website](https://www.gov.uk).

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

The primary purpose of requesting documentary evidence to confirm the applicants address is to establish that it relates to a real property and that the applicant actually does reside at that address.

Where seeking more than one form of documentary evidence from this list, these should ideally be from different sources.

Examples of acceptable documents for confirmation of address may include any of the following:

Utility bill or letter from the service provider confirming the pre-payment terms of services at a fixed address (for example, gas, water, electricity or landline telephone). More than one than one utility bill can be accepted if they 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 photo-card 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, or notice of coding.\*\*

A financial statement such as bank, building society, credit card statement, pension or endowment statement. (UK)\*

Bank or building society statement from countries outside of the UK. Branch must be located in the country in which the applicant lives and works.\*

Credit union statement. (UK)\*

Mortgage statement from a recognised lender. (UK)\*\*

Local council rent card or tenancy agreement.\*

Evidence of entitlement to Department for Work and Pensions benefits, such as child allowance, pension etc. (UK)\*\*

\*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.

If not denoted, the document can be more than 12 months old.

### **What to do if the applicant cannot provide proof of address?**

If the applicant is genuinely unable to provide proof of address in their own name (for example, because they are house-sharing or living with friends or family) employers may wish to seek confirmation from an electoral register that a person of that name lives at the claimed address. A check of electoral registers can be carried out by contacting the relevant local authority for the area the applicant claims to be residing in.

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

Recommended acceptable non-photographic documents may include any of the documents listed below. Where seeking more than one form of documentary evidence from the list below, these should be from different sources, wherever possible.

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.

If not denoted, the document can be more than 12 months old.

## Young people who are in or 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 which may discourage or restrict the employment of young people.

It is recognised that it may be problematic for certain young people to present the suggested documents, especially if they have just left full-time education and are seeking employment for the first time. Where applicants are genuinely unable to do so, employers should, as a minimum, seek the following combination of documents:

### One form of personal photographic identity:

An 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 (must be valid and in-date).

A passport-sized photograph that is counter-signed by a person of some standing in the applicant's community.

and

**Two forms of documentary evidence from the list below:**

A grant or student loan agreement from a local education authority (UK).

A qualification certificate.

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).\*

\*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.

If not denoted, the document can be more than 12 months old.

# APPENDIX 2: CHECKING DOCUMENTS FOR AUTHENTICITY

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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 it 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, and poor paper or 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 Home Office guidance available on [Gov.uk](https://www.gov.uk) and they can also check an applicant's biometric residence permit using the [Home Office online checking portal](#).

## 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 (for example, name, and 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 online share driving licence service](#) which is available on the gov.uk website (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 photocard card displays ultra-violet markings in the form of two '100 per cent 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 [HM Passport Office section](#) of the Gov.uk 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.