Manual identity check - minimum requirements

2.1 Requesting original documents

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

2.1.2   When checking the validity of the documents and that photographs are a true likeness of the person presenting themselves, it is best practice to be in physical possession of the original documents and carry out this examination in person. Other alternative methods include remotely via a live video call, for example, Zoom and FaceTime. Any risks identified when using live video must be assessed and mitigated by employers when choosing to implement this practice. Employers must not rely on the inspection of the documents via a live video link, or by checking a faxed or scanned copy of the document without seeking original documentation as soon as practical e.g. when the individual first takes up the position or are required to undertake induction or other type of training.

2.1.3   Every assurance should be obtained to ensure documents are bona fide and the identity can be attributed to the individual being appointed. Including checking that photographs are a true likeness of the person presenting themselves. To verify a person's identity remotely, the following four-step process should be followed:

● Step 1: ask the individual to provide a scanned copy or photo of their original identity documents via email or by using a mobile app.

● Step 2: arrange a video call with the individual and ask them to hold up the original documents to the camera and check them against the digital copies sent by email or mobile app.

● Step 3: record that a check has been done remotely and the date of that check.

● Step 4: seek, verify, and copy original documentation as soon as practical e.g. when the individual first takes up the position or are required to undertake induction or other type of training.

2.1.4   In all cases, employers must take a photocopy or a scanned copy of each of the original documents presented to them and retain these on file

in line with current data protection law. All photocopies or scanned copies should be signed, dated, and certified by the person taking the copy (either by hand or digitally).

2.1.5   Employers should refer to the <u>guidance on lawful processing</u> available from the Information Commissioner's Office (ICO), which includes information on documenting your processes.

2.2 Acceptable documents

2.2.1   A list of documents that may be obtained and validated as part of an identity check is provided in **Appendix 1** (as a guide only). 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 the highest level of assurance when presented in the combinations outlined below.

2.2.2   Individuals will need to provide **<u>one</u>** of the following combinations:

• two forms of photographic personal identification from List 1, and one document confirming their current residing address from List 2

or

• one form of photographic personal identification from List 1, and two documents confirming their current residing address from List 2.

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

• two documents confirming their current residing address from List 2

• two forms of non-photographic personal identification from List 3

and

• a passport-sized photograph of themselves.

2.2.4   The list of documents provided in **Appendix 1** is a guide only. Employers may choose to accept and validate alternative documents as part of an identity check but should recognise that not all documents offer the same level of assurance and therefore wherever possible, employers should seek to obtain documents or combinations of documents which can provide the highest level of assurance such as those that have security features or biometrics which are more easily verifiable. 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.

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 in **Appendix 1** for further details)

- contain the individual's full name, photograph, and signature

- have required some form of identity check before being issued to the individual.

2.2.5   Employers should not accept one form of identification to confirm both an individual's name and address – unless otherwise stipulated in **Appendix 1**. For example, if an individual provides 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.

2.2.6   Where individuals cannot provide 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 website for a list of recommended persons of some standing in the community who can be relied on to counter-sign photographs.

2.3 Checking authenticity of documents

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

2.3.2   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.

2.3.3   If an individual genuinely cannot provide original documentation, employers may request that they ask their bank or utility provider to endorse and stamp the copy. Alternatively, employers may choose to ask the individual 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.

2.3.4   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 individual.

2.3.5   When considering authenticity of identity documents, employers may find it useful to refer to government guidance on verifying different forms of identification to detect basic forgeries. As well as the public register of authentic travel and identity documents online (PRADO), which

shows example images of documents and security features from other countries.

2.3.6   Many employers have invested in electronic ID document scanning devices to support their manual processes to check authenticity. Electronic ID document scanning devices are a valuable aid to detecting fraudulent documents. There are lots of 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. They cannot detect incidences where individuals have obtained a legitimate document fraudulently. For example, if an individual has fraudulently taken on another identity 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.

2.3.7   Employers must make it clear, in writing, to all applicants that documents presented for identity purposes will be checked for authenticity either manually, through an appropriate body, and/or using an electronic scanning device.

2.4 Conducting in-person meetings

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

2.4.2   Where the verification of identity check was conducted remotely earlier in the recruitment process using video calling, such as Zoom, the cross-matching of original documentary evidence must be conducted in-person as soon as practical e.g. when the individual first takes up the position or are required to undertake induction or other type of training.

See section 2.1for further information about the process to verify an individual's identity remotely.