

Who to check and when

Minimum requirements

3.1.1 Employers must ensure the identity of all workers (including volunteers, students, temporary workers, and contractors) has been verified before commencing any type of work or volunteering.

3.1.2 Employers are advised 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 individual presenting themselves is the person they interviewed.

3.2 Existing employees

3.2.1 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.

3.2.2 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.

3.2.3 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.

3.2.4 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.

3.3 Contractors and temporary workers

3.3.1 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.

3.3.2 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.

3.3.3 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.