



MP LOCUMS HEALTHCARE LTD

ID CHECK POLICY

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Introduction

The purpose of undertaking identity checks is to minimise the risk of employing or engaging a person in any activity within the NHS who is an illegal worker, or a person that is impersonating another.

Verifying someone's identity is the most fundamental of all employment checks. It should be the first check performed, as any other checks will be invalid if the person's identity cannot be proven.

MP Locums Identity checks are designed to:

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

Overview

MP Locums Identity Check process involves checking two elements of a person's identity:

- **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.
- **Biographical** – a person's personal history including education and qualifications, addresses, electoral register information and employment history.

MP Locums uses three methods for verifying identity:

- receiving original documents
- checking document authenticity
- validating an agency worker's personal details against external reliable sources, including information held by previous employers (subject to the agency worker providing relevant consent that such information can be accessed).

MP Locums ensure that our staff are suitably trained to undertake appropriate checks in order to satisfy themselves that the identity of all agency workers has been verified.

Information obtained from reliable sources are cross-referenced against information provided by the agency worker to identify any mismatches. MP Locums investigate any mismatches so that we can be assured of both the attributable identity and the biographical identity of the person.

Original documents allow MP Locums to check an employee's:

- full name – forenames and last name
- signature
- date and place of birth
- current address and provide biographical information that can be verified and cross-referenced.



All agency workers must provide acceptable documents containing their photograph (where available), such as a passport or UK photo driving licence, and original documents providing their current address, such as a utility or bank statement.

A full list of acceptable documents is provided in **Appendix 1**.

Conducting a face-to-face meeting plays an important and integral part of our identity checking process. This provides an opportunity to compare the photograph with the agency worker present and it also provides an opportunity to question the agency worker regarding any documentary evidence presented.

Agency workers will need to provide either of these two combinations:

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

All documents identified in the lists below must be:

- original
- from a trustworthy and reliable source
- valid, dated and current
- ideally one which would be difficult to forge.

Where agency workers genuinely cannot provide original documentation, MP Locums require applicants to obtain official statements from banks or utility providers.

At least one document must show the agency worker's signature. Where a signature has not previously been provided, for example because of an e-application, the agency worker will be asked to provide this at the earliest opportunity so that MP Locums can check this against relevant documentation.

In all cases, MP Locums will take a photocopy (or scanned copy) of each of the documents presented to them by the applicant and retain these on file. All photocopies (or scanned copies) will be signed, dated and certified by the person taking the copy.

MP Locums will scan identity documents using our electronic ID document scanner (Idscan).

MP Locums record all outcomes of identity checks in our Eclipse Recruitment Management System confirming that the identity of the agency worker has been verified.

Checking documentation for authenticity

Checking document authenticity is an integral part of the verification of identity check process. MP Locums make it clear, in writing, to all agency workers that any relevant documents will be checked for authenticity.

See **Appendix 2** - how to check document authenticity.

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

Appendix 1: Acceptable documentary evidence for proof of identity

List 1: Acceptable photographic personal identification

MP Locums will, in the first instance, always obtain photographic documents to verify a person's identity and this will be compared with the applicant's likeness by conducting a face-to-face meeting. 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 and other valid evidence relating to their immigration status and permission to work
- UK full or provisional photo-card driving licence – where relevant to the position being recruited to, additional information may be sought about any penalties or restrictions through the DVLA's on-line 'Share Driving Licence Service'.
- EU/other nationalities photo-card driving licence (valid up to 12 months up to the date of when the agency worker entered the UK and providing that the person checking is confident that non-UK photo-card driving licences are bona fide)
- Biometric Residence Permit (formerly known as identity cards for foreign nationals) (UK)
- HM Armed Forces Identity card
- ID cards carrying the PASS accreditation logo (UK and Channel Islands), 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 UK passports and driving licences.

Any other document that is not listed above, for example organisational ID cards, will not be accepted.

If no acceptable photographic identification documents are available:

If an agency worker genuinely cannot provide any form of acceptable photographic personal identification as outlined within List 1 above, then the following combination of documentary evidence should be requested:

- two documents confirming their current address from List 2
- two forms of non-photographic personal identity from List 3; and
- a passport sized photograph of themselves.

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

The photograph should be accompanied with a signed statement from that person, stating the period of time they have known the applicant. Always check that the signature provided in the statement matches the one on the back of the photograph,

and that it contains a legible name, address and telephone number so that information can be verified.

List 2: 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. Utility bills in joint names are also permissible (UK)*
- local authority tax statement – for example, a council tax statement (UK and Channel Islands)**
- UK full or provisional driving licence – if not already presented as a personal photographic identity
- UK full driving licence (old-style paper version), 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 but not a P45 or P60)**
- financial statement such as bank, building society, or credit card statement* (UK and EEA. Non EEA statements must not be accepted)
- credit union statement (UK)*
- mortgage statement from a recognised lender** (UK and EEA – non EEA statements must not be accepted)
- local council rent card or tenancy agreement*
- benefit statement, book or card; or original notification letter from the Department of Work and Pensions (DWP) confirming the rights to benefit – for example, child allowance, pension (UK)**
- confirmation from an electoral register search that a person of that name lives at the claimed address.**

Providing documentary evidence for previous addresses may be difficult if the check covers a long period of time, therefore MP Locums may carry out an electronic identity database search, for example a check against the electoral register.

Any gaps in residence details will be handled sensitively and probed at the interview stage. There may be many reasons as to why this cannot be accounted for, such as foreign residence or travel.

If a gap in residency is more than a period of three consecutive months or a period of six cumulative months, MP Locums will ask the agency worker to provide relevant documentation to cover the period in question, for example checking the agency worker's passport or other documentation to prove their stay in those countries. If the agency worker has been living abroad MP Locums will ask them to provide confirmation of address such as a tenancy agreement or a bank statement.

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

Acceptable non-photographic documents 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
- 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)
- benefit statement, book or card or original notification letter from the Department of Work and Pensions (DWP) confirming the legal right to benefit for example, child allowance, pension**
- 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)*
- most recent tax notification from HM Revenue and Customs (i.e. tax assessment, statement of account, notice of coding, P45 or P60 (UK and Channel Islands).**

*All documents must be dated within the last three months, unless there is good reason for it not to be, for example where there is clear evidence that the agency worker was not living in the UK for three months or more. These documents must contain the name and address of the applicant.

** 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 check process. MP Locums make clear, in writing, to all agency workers 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.

Visas

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

Biometric residence permits

MP Locums refer to UK Borders Agency guidance at:

www.ukba.homeoffice.gov.uk/brp-information-leaflet.pdf

Photo-card driving licences

New driving licences now 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.

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 should be the day before the bearer's 70th birthday (unless the bearer is already over 70). The valid to date can therefore be cross-referenced with the applicant's date of birth, which appears on other verification ID.

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.
- When 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 the 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.

Supporting documentation

Documents such as utility bills and bank statements support an agency worker's identity and proof of address but they 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 can be easily checked. The following checks will help to identify any inconsistencies or anomalies.

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