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IDENTITY CHECKS

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INTRODUCTION

What is an identity check?

Identity checks are designed to determine that the information given by an applicant is genuine, it relates to a real person, and establishes that they own and are rightfully using that identity.

The 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.

The gov.uk website features a good practice guide for identity proofing and verification of an individual, which may be helpful to understand some of the principles backed up within this document.

Importance of 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 illegal worker
- 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 any other checks will be rendered invalid if the person's identity cannot be proved.

Identity fraud is on the increase 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.

A good practice case study outlining how King's College hospital used this approach can be found on the NHS Employers website.

An introduction to identity document verification technology can be found on the gov.uk website.

Minimum requirements

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 provide documents containing their photograph, such as a passport or UK photocard driving licence, where available. They will also be required to provide a range of documents that confirm their current address and evidence of residency, such as a utility bill or bank statement.

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 requirements of the General Data Protection Act 2018 and only for as long as it is relevant for legal obligations or inspections. 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 is usually completed at interview stage by a member of the interview panel. All photocopies or scanned copies should be signed, dated and certified by the person taking the copy. This could include a digital signature, if preferred,



however employers should put sensible processes in place to ensure these are easily traceable and communicated across recruitment teams.

Validating documents

Employers must carry out check on:

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

A list of baseline documents that we recommend should be seen, reviewed and validated as part of an identity check is provided in appendix one.

Some documents are more reliable than others and only certain documents in certain combinations are acceptable for the purpose of verifying identity.

Prospective employees 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.
- 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 forms 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.

Each of the documents provided should be from a different source. Where individuals have no other forms of photographic personal identification, photographs must be endorsed on the back with the signature of a person of some standing in their community, who has known them personally, not just professionally, for at least two years.

Further guidance about what to do if an individual cannot provide photographic documentary evidence can be found in appendix one.

A list of recommended persons of some standing in the community who can be relied on to counter-sign photographs can also be found on the NHS Employers website.

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. All documents should be original and valid (in-date).

Producing original documentation to evidence address and social history has become increasingly difficult with the shift toward web-based banking and online payment of utility bills. While these documents support an individual's identity and proof of address, they are not identity documents as they do not contain any security features that can easily be checked. Given modern IT, these documents are easily obtainable and can be forged.

If applicants genuinely cannot provide original documentation, employers must make a risk-based judgment against the job role and what documentary evidence they require to seek the necessary assurances. It is perfectly acceptable to require applicants to obtain official statements from banks or utility providers, some banks will endorse online statement printouts on request. As an alternative measure, where employers have concerns they may choose to ask applicants to log in to online banking facilities, to verify the information provided as a printout. Any such checks should be undertaken purely for the purpose of verifying identity, sensitive financial information should remain confidential.

Documents downloaded from the internet must not be accepted in isolation and the information provided will need to be cross-referenced with other



documentary evidence gathered as part of the identity check and the employment checking process as a whole.

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 reasonable checks to validate that they are bona fide and that the person is the person referred to in those documents.

Some organisations may make a risk-based decision to conduct the interview process using video calling, such a Skype, with a requirement to cross-match documentary evidence with a physical person on the employee's first day.

Who to check and when

Employers should undertake identity checks prior to allowing any individual to begin any form of work or activity on their behalf, including volunteers. It is advisable to ask for proof of identity on an individual's first day of work, to ensure that the person who has presented is the person who was 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 their existing staff and, where any new standards are significantly different, assess whether checks should be applied retrospectively.

Any retrospective identity checks must be proportionate to risk and it is recommended that checks only be repeated when suitable opportunities arise. For example, when an existing member of staff or volunteer changes roles within the same organisation, or when a periodic Disclosure and Barring Service (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 may easily identify when retrospective identity checks may be relevant.

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

Contractors and temporary workers

The verification of identity is as much a priority for contractors and temporary workers supplied through an agency, as with permanent members of staff.

For the purpose of these standards, contractors and temporary staff are defined as individuals who are not employees of an NHS organisation but who have a direct or indirect contractual relationship to provide NHS services to that organisation. Contractors or temporary staff may be engaged to work within an NHS organisation through a third party organisation or agency.

If appointing staff from an agency or other external body to provide NHS services, employers will need to gain appropriate assurances that these providers have undertaken identity checks in compliance with this standard and that they too are keeping their operational practices up to date.

Where appointing temporary workers, employers should, as a minimum, require the individual to provide some form of personal photographic identity when they first take up their appointment.

Documents presented in different names

There are many legitimate reasons as to why someone may have documents in different names, for example, they may be married, divorced or they may just simply choose to be known by another name. Individuals may choose to change their name at any time and be known by this name without going through any legal process.

Employers should only accept identity documents in different names where the applicant can provide supporting documentary evidence of their name change. For example, documentary evidence might include:

- 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, employers will need to undertake a risk assessment to determine whether or not they should continue to consider that individual for employment or not. On any such rare occasions, we would recommend that the risk assessment should be conducted



by a senior member of the HR recruitment team in liaison with the security department.

Prospective employees with no fixed abode

Seeking the necessary documentary evidence for an individual who is officially recognised as homeless, poses a particular challenge for employers. 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

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.

Alternatively, employers can 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

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. Employers may choose to accept other forms of documentary evidence where individuals are genuinely unable to provide you with those suggested in this document. 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.

Employers may find it useful to refer to our document cross-reference tool, available on the NHS Employers website. This tool is intended to help employers more easily identify the type and range of documentary evidence they should seek to verify an applicant's identity, right to work and, where relevant to the position, those required to apply for a DBS check.

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 EU/other nationalities passport*

UK Biometric Residence Permit (BRP) card*

UK/EU full or provisional photocard driving licence (if issued in the UK 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/EU 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 NHS Employers website.

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)** $\ensuremath{\mathsf{S}}$

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 and EEA). Statements issued outside of the EEA must not be accepted.

Credit union statement (UK)*

Mortgage statement from a recognised lender** (UK and EEA). Statements issued outside of the EEA must not be accepted.

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:

1. 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

2. 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

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 guidance available on the UK Visa and Immigration (UK VI) section of the gov.uk website.

UK Visas and Immigration (UK VI) also provides a useful online tool for checking an applicant's biometric residence permits.

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.

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- 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% 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.



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