

## **Identity**

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Needing to establish a worker's identity is a critical part of the recruitment process at Inna Care. Identity must be established prior to the worker being deployed in the provision of the services. This includes sighting original documentation in the presence of the candidate and saving records in a way which cannot be altered to support the checks completed.

Verification of identity checks are designed to:

1. Determine that the identity is genuine and relates to a real person
2. Establish that the individual owns and is rightfully using that identity.

The process involves checking two elements of a person's identity:

1. **Attributable:** the evidence of a person's identity that they are given at birth (including their name, place of birth, parents' names and addresses).
2. **Biographical:** a person's personal history including registration of birth, education and qualifications, electoral register information, details of taxes and benefits paid by or to the person, employment history, interactions with banks and utilities providers.

Biometric identity – such as fingerprints, voice, retina and DNA – is not a required part of the NHS verification of identity checks.

With all photographic identity documents obtained during the recruitment process, we take copies of all pages which include (but are not limited to): personal details; photographic ID; candidate signatures; issue and expiry dates. A comparison is made between the candidate and also, signatures (manual) provided by the candidate on corresponding documents obtained during the recruitment process.

In line with current (2019) NHS standards, Inna Care will look to establish a worker's identity using the following combination of documentation:

- Two forms of photographic personal identification and one document confirming their address; or,
- One form of photographic personal identification and two documents confirming their address.

**Below is a list of acceptable photographic ID documents:**

1. Full, signed UK (Channel Islands, Isle of Man or Irish) passport or EU/other nationalities passport\*
2. UK Biometric Residence Permit (BRP) card\*
3. 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)\*\*
4. 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)
5. HM Armed Forces Identity card (UK)
6. 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.
7. 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 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.

Any other document that is not listed above (e.g. organisational ID card) will not be accepted.

**Below is a list of acceptable proofs of addresses used in combination to prove a worker's identity:**

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.

Acceptable documents for confirmation of address include:

- 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 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 (6) 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. 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.*

Items such a Full UK Birth Certificate and proof of National Insurance do not provide sufficient evidence of identity. Therefore, this will not be requested to establish identity by Inna Care.

Where a candidate is genuinely unable to provide suitable photographic ID, Inna Care will ensure that a separate combination of documents is obtained. This will be:

- 2 x Acceptable proof of address and 2 x Acceptable Non-Photographic Identity and a Passport Sized Photo (including endorsement and statement from a person of standing).

### **Persons of Standing**

- Accountant
- Airline pilot
- Articled clerk of a limited company
- Assurance agent of a recognised company
- Bank/building society official
- Barrister
- Chairman/director of limited company
- Chiropodist
- Commissioner of oaths
- Councillor (local or county)
- Civil servant (permanent) (excluding those who work for the HMPO)
- Dentist
  
- Director/manager/personnel officer of a VAT-registered company
- Engineer (with professional qualifications)
- Financial services intermediary (for example, a stockbroker or insurance broker)
  
- Fire service official
- Funeral director
- Insurance agent (full time) of a recognised company
- Journalist

- Justice of the peace
- Legal secretary (for example a fellow or associate member of the Institute of Legal Secretaries and Personal Assistants)
- Licensee of a public house
- Local government officer
- Manager/personnel officer of a limited company
- Member, associate or fellow of a professional body
- Member of parliament
- Merchant navy officer
- Minister of a recognised religion, including Christian science
- Nurse (RGN and RMN)
- Officer of the armed services (active or retired)
- Optician
- Paralegal (certified paralegal, qualified paralegal or associate member of the Institute of Paralegals)
- Person with honours (for example, OBE or MBE)
- Pharmacist
- Photographer (professional)
- Police officer
- Post Office official
- President/secretary of a recognised organisation
- Salvation Army officer
- Social worker
- Solicitor
- Surveyor
- Teacher/ lecturer
- Trade union officer
- Travel agent (qualified)
- Valuer or auctioneer (fellows and associate members of the incorporated society)
- Warrant officers and chief petty officers (excluding those who work for HMPO)

In line with the NHS Employment Checks Standards, Inna Care ensure that only the following Non-Photographic Identity is accepted:

- 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. 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.*

Where the worker provides documentation which shows different names, Inna Care will look to obtain sufficient proof of name change, in the form of either: marriage certificate; divorce certificate; change of name deed poll or any other legal document which can sufficiently prove a change in the worker's name. Proof of name change documents must be original seen, with verified copies retained in the worker's file.

When acquiring photographic ID from the worker, Inna Care will ensure that a comparison is made between the pictures within the document, and also check the date of birth to ensure it is consistent with the person who has supplied the document.

Should any concerns arise over the authenticity of a worker's Identity document, Inna Care will look to seek advice and guidance from a number of external bodies, including (but not limited too): The Home Office, Prado, NHS Counter Fraud Authority and the Metropolitan Police.

All documentation obtained in order to establish a worker's Identity must be original documentation, signed and dated to that effect. All documents will be retained within the agency worker's file.

### **Verification**

Inna Care will ensure that at all times, ID and RTW documentation is verified with the use of an ID Verification scanner. This will meet with good industry practice and the standards set by the Framework Agreement and any current (and future) legislations and regulations. Furthermore, all documentation will be saved in line with WORM principles. This tool automatically checks all security features and details present on ID documents against information provided by various government bodies and agencies across the globe.

A printout is provided which confirms what checks have been undertaken and their individual status's (i.e. PASS/FAIL). This is retained on file and made readily available for auditors during any audit process undertaken.

Useful Tools and websites for verification and reporting concerns:

<https://www.gov.uk/employee-immigration-employment-status> - Employers Checking Service

<https://www.gov.uk/government/organisations/uk-visas-and-immigration> - UK Visas and Immigration



<http://www.consilium.europa.eu/prado/en/7266/index.html> - European Council of Right to Work Documents

<https://www.gov.uk/report-immigration-crime> - Reporting Immigration Crime

<https://www.gov.uk/check-biometric-residence-permit> - Biometric Residence Permit Check

<http://www.nhsemployers.org/your-workforce/recruit/employment-checks> - NHS Employment Checks (Right to Work)

Inna Care utilise an ID Verification Scanner in order to further verify documentation provided in order to prove a candidate Identity. This tool automatically checks all security features and details present on ID documents against information provided by various government bodies and agencies across the globe.

A printout is provided which confirms what checks have been undertaken and their individual status's (i.e. PASS/FAIL). This is retained on file and made readily available for auditors during any audit process undertaken.

### **Temporary Covid-19 Rules**

Inna Care will apply the following measures to conduct identity checks during COVID-19:

- Arrange a video call with the worker 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.
- Record that a check has been done remotely because of COVID-19 and the date of that check.

Inna Care will continue to seek original documentation as soon as practical. As a minimum, individuals should be asked to show one form of photographic personal identity when they first take up the position or are required to undertake induction or other type of training. Other original documents may need to be presented at this point if they have not already been seen and validated earlier in the process (e.g. where the interview was conducted face to face).

Inna Care is mindful, that because of COVID-19, some individuals may be unable to provide the necessary documentary evidence. During this period, Inna Care will take extra care to ensure applicants are not discriminated against because they genuinely cannot present the prescribed range of documents. In such cases, Inna Care will take a risk-based approach to recruitment based on the range of documents applicants can reasonably provide at this time.

### **Review**

This policy statement will be reviewed annually as part of our commitment to upholding professional standards. It may be altered from time to time in the light of legislative changes, operational procedures or other prevailing circumstances.

