

Identity Checks



Xander Recruitment Group

Guide to verifying potential Agency Staff requirements to register with Xander Recruitment Group (XRG)

Identity Checks



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Introduction

AT Xander Recruitment Group due to working in the Health Care Sector we follow strict guidelines around ensuring all our agency staff are verified as to who they say they are and have the Right to Work (RTW) in the UK. This forms a critical element of our compliance procedure (see policy on Recruitment, Assessment and Training Procedure)

The below is a guide to ensure that we are in line with current legislation and ensuring thorough vetting practices are in situ. That we ensure that we are following best practice on documents for verification on identity.

1.1 What constitutes an Identity Check?

- 1.1.1 Verifying someone's identity is the most fundamental of all the employment checks. Undertaking identity checks reduces the risk of employing or engaging a person in any activity who is:
 - an individual impersonating another
 - avoiding the detection of a criminal offence
 - an individual who has used fraudulent means to obtain genuine documents to seek employment.
- 1.1.2 It should be the first check performed by the compliance team, as all other checks will be rendered invalid if the person's identity cannot be verified.
- 1.1.3 Identity theft is increasing, and it is important for our agency to periodically review local policies and processes to ensure we remain in line with legal requirements and new technologies, as operational standards are strengthened.

1.2 How to Verify Identity

- 1.2.1 XRG carry out an Identity check using the following:
 - ensuring original identity documents are obtained.
 - checking the authenticity of the original identity documents
 - conducting a video interview call with the passport held up to verify them with a picture taken at that time.
 - validating personal details against external reliable sources.

2. Standard Requirements

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- 2.1.1 Individuals must be asked to provide a range of documents that confirm their name, their current
- 2.1.2 address and evidence of right to work in the UK
- 2.1.3 When checking the validity of the documents and that photographs are a true likeness of the person presenting themselves, XRG follow best practice to be in physical possession of the original documents and carry out this examination in person. We at Xander also use a government approved checking service called Zellis if not able to be in possession of the original documents required. We at Xander also use Zellis to verify documents remotely for those we have done live video call with for example, Zoom and FaceTime. Any risks identified when using live video must be assessed and are mitigated by us when choosing to implement this practice due to using a certified party to verify the documents. XRG also seek to verify 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 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 five-step process should be followed:
- Step 1: ask the applicant to provide a scanned copy or photo of their original identity documents via email or by using a mobile app. Use our certified company to verify the documents.
- 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: Using our certified checking service to ensure the documents are valid
- Step 5: 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, Xander Recruitment Group will ensure a photocopy or a scanned copy of each of the original documents presented to them and retain these on file in line with the Data Protection Act 2018. 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 Xander Recruitment Group refer to the [guidance on lawful processing](#) available from the Information

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Commissioner's Office (ICO), which includes information on documenting your processes.

2.2 Appropriate Documents

2.2.1 A list of documents that may be obtained and validated as part of an identity check is provided in [appendix one](#) (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 **one** 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 one](#) is a guide only. Xander Recruitment Group may choose to accept and validate alternative documents as part of an identity check but we recognise that not all documents offer the same level of assurance and therefore wherever possible, Xander Recruitment Group will 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:

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- 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 one](#) 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.

XRG should not accept one form of identification to confirm both an applicant's name and address – unless otherwise stipulated in [appendix one](#). For example, if an applicant 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.

2.3 Checking the Authenticity of ID

2.3.5 XRG will not accept the documents at face value without undertaking all reasonable effort to verify that they are bona fide.

2.3.6 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.

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

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of sensitive financial information should remain strictly confidential.

- 2.3.8 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 applicant.
- 2.3.9 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),

- 2.3.10 which shows example images of documents and security features from other countries.
- 2.3.11 Xander Recruitment also use a certified Portal to verify documents that we are not able to see in person to ensure that these documents are authentic and are inline with our compliance procedures to ensure that best practice is in place to validate that the agency staff member is who they claim they are
- 2.3.12 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 Face- Face meetings

- 2.4.1 Conducting an in-person meeting is an important and integral part of the Xander recruitment process, providing an opportunity to compare any photographic documentation 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 all reasonable checks to validate that they are bona fide, and the person 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 2.1](#) for further information about the process to verify a person's identity remotely. Xander also use a certified checking service to verify

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documents for when unable to see the documents in person. The checking service we use meets all current government legislation on identity checks.

3.1 Who should Xander be checking and when.

- 3.1.1 Xander must ensure the identity of all agency staff has been verified
- 3.1.2 Before commencing any type of work with us.
- 3.1.3 Xander at any time may ask individuals to show some form of photographic identity, so that this can be cross matched with what was originally brought in and that it matches the ID badges that they must wear on any assignment given to them by us.

3.2 Existing Xander Agency Staff

- 3.2.1 Retrospective or periodic checks on existing Xander staff are not usually needed. However, standards and practices used to check and validate identity are improved and strengthened over time. Xander will 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 changes roles within the same organisation, or when a periodic DBS check is undertaken or a document has reached its expiry date so new documents are required from the Xander staff member to remain compliant to be able to work.
- 3.2.3 When recording identity checks on our CRM system, we at Xander note the operational standard used at that time, so that we can easily identify when repeat checks may be relevant such as DBS check etc..
- 3.2.4 When retaining a record of employment checks, Xander recruitment ensures 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.

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3.2.5 Xander Recruitment Group will ensure that all our staff always have an

3.2.6 ID badge on show to be shown to the client as required and that a profile will be sent to the client beforehand with a photo and other relevant information to verify the staff member coming to them.

4.0 Documents presented in different names.

4.1.1 There are many legitimate reasons as to why someone may have documents in different names, for example, through marriage, divorce, religious or professional reasons or they may prefer to be known by their middle name. Individuals may choose to change their name at any time and be known by this name without going through any legal process.

4.1.2 Any such information must be matched with supporting documentary evidence that recognises the

4.1.3 name change. For example, this might include but is not exclusive to:

- a marriage or civil partnership certificate
- a decree absolute/civil partnership dissolution certificate
- a deed poll certificate
- a recognition certificate.

4.1.4 If the agency member upon registration cannot provide sufficient proof of their change of name as described above, then Xander recruitment will undertake a risk assessment to determine whether to confirm an unconditional offer of employment with our agency or not. On rare occasions where the necessary assurances cannot be obtained, Xander recruitment would ensure that a risk assessment is conducted with senior members of the team and extra regulations on where they can be placed might be put in place, but we would ensure if required that a decision not to appoint is reasonable and fair.

5.0 Doubts on how Authentic Documents received are and how to act.

5.1.1 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.

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- 5.1.2 Further guidance can be found on the UK visas and immigration section of the [gov.uk website](https://www.gov.uk).
Alternatively, employers can call the Employers and Education Providers helpline: 0300 123 4699.
- 5.1.3 Employers can also use their local counter-fraud service to do this on their behalf.
- 5.1.4 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 could follow up with the relevant sources.
- 5.1.5 In exceptional circumstances, where checks reveal substantial misdirection, employers may feel it appropriate to report these concerns to the local police. Employers can also call the 24-hour fraud and corruption reporting line on 0800 028 40 60.
- 5.1.6

Appendix 1: Recommended forms of Identity to prove Identity.

Lists 1, 2 and 3 below 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 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 by Xander Recruitment Group to ensure that our compliance meets the regulatory conditions in the healthcare sector. The documents in the list are what the government bodies recommend should be obtained so we follow these guidelines as set out by them.

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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 an in-person 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 other nationalities passport*

UK Biometric Residence Permit (BRP) card*

UK full or provisional photocard driving licence. (If issued 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 government issued identity cards that comply with Council Regulation (EC) No 2252/2004, containing a biometric

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* Guidance on immigration status documents can be found on the www.gov.uk

** 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](http://gov.uk). 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 [gov.uk website](http://gov.uk).

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 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:

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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)*

Bank or building society statement from countries outside of the UK. Branch must be located in the country in which the applicant lives and works*

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Credit union statement (UK)*
Mortgage statement from a recognised lender (UK)**
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 three 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

Where seeking more than one form of documentary evidence from the list below, these should be from different sources, wherever possible.

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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)

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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 three 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:

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.

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and

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 using an electronic scanning device.

Passports (UK and Overseas)

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- 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.

Biometric Residence Permits

Xander Recruitment Group will use and refer to the general Home Office guidance available on the [gov.uk website](https://www.gov.uk). Xander Recruitment Group will also check an applicant's biometric residence permit using the [Home Office online checking portal](#).

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](https://www.gov.uk) (not available for licence

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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.
- 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.

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.

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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.

- 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 per cent 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](https://www.gov.uk).

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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, most bills are machine folded before being sent to customers.

Using this guide our compliance team at Xander Recruitment can follow best practices when verifying the identity and legitimacy of agency staff we recruit and place with our clients

Alex Stockley - Managing Director – XANDER RECRUITMENT GROUP LIMITED

A handwritten signature in black ink that reads "Alex Stockley".

Date: March 2024