

# IDENTITY CHECKS POLICY

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<b>Date:</b>	August 2023
<b>Review Date:</b>	August 2024
<b>Policy review schedule:</b>	Every 12 months
<b>Document Ref:</b>	CJH10007/6

Carejoy Healthcare Ltd. complete all the pre-employment checks prior to the candidate being considered for any shift via the agency.

It is the responsibility of the Compliance Team to confirm the identity of the candidate prior to placing via our agency.

Every member of the Compliance and Sales Team at Carejoy Healthcare are enrolled in Right to Work training with the Head of Compliance and given further material to keep and refer to during their induction and prior to placing any candidates.

The NHS Employers website and the Government website are used to adhere to the recommended proofs of identity documents to use and to confirm all the up-to-date standards are in practice.

All candidates are asked to provide at least three forms of identification at interview from either of these two combinations:

- Two forms of photographic personal identification and one document confirming the individual's current residing address, or;
- One form of photographic personal identification and two documents confirming their current residing address.

All forms of documentary evidence must be original and, if dated, must be valid and current.

To validate identity of the candidate, we utilise the TrustID on-line ID check to confirm the photograph, full name including any forenames, last name and middle names previously or currently used is consistent against all documentation within the compliance pack and on TrustID. Date of birth, residing address and any other social biographical history is cross-referenced throughout the compliance procedure.

To confirm identity the candidate brings originals of various proofs of identity with them to their face-to-face interview or where not feasible due to Covid Protocols Interviews are conducted remotely – these documents are collected by our Clinical Advisory Team. In all cases, the documents are photocopied (or scanned) and retained on the candidate's file. All photocopies/scanned copies are verified by original sight stamp or adjusted check stamp with the signature of the person sighting, full name, job title and date sighted. Where identity documents have been provided in a foreign language, an independently verified translation will be obtained.

Acceptable photographic personal identity documents include;

- Full, signed UK (Channel Islands, Isle of Man or Irish) Passport or EU/other nationalities Passport
- Passport of non-UK nationals and other valid evidence relating to the candidate's 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 online "Share Driving Licence Service".
- EU/other nationalities photo-card driving licence (valid up to 12 months up to the date when the individual entered the UK and providing that the person checking is confident that non-UK photo-card driving licences are bona fide)
- HM Armed Forces Identity Card (UK)
- 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, must not be accepted.

If the candidate is genuinely unable to provide a photographic proof of identification, they will be asked to bring along to their interview all of the following:

- Two forms of non-photographic personal identification
- Two documents confirming their current residing address
- A passport-sized photograph of themselves which has been endorsed on the back with the signature of a "person of standing" in their community. A "person of standing" may be a Solicitor, medical practitioner, Police Officer

A list of recommended persons of some standing in the community can be found on the NHS Employers website <https://www.nhsemployers.org/your-workforce/recruit/employment-checks/identity-checks>

The photograph should be accompanied by a signed statement from that person, indicating the period of time that the individual has been known to them. Always check that the signature on the statement matches with the one on the back of the photograph and that it contains a legible name, address and telephone number.

Below is a list of the acceptable confirmation of address documents that we would ask the candidate to bring:

- Utility bill (gas, water, electricity or land-line telephone)
- 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 form of identity
- UK full driving licence (the old-style paper version), old-style provisional driving licences are not accepted
- Most recent HM Revenue & Customs tax notifications (i.e. tax assessment, statement of account, notice of coding but not P45 or P60)
- Financial statement such as bank, building society or credit card statement (UK and EEA only)
- Credit union statement (UK)
- Mortgage statement from a recognised lender
- 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)

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. These documents must contain the name and address of the applicant.

Other identity documents that we would consider using if there was no photographic proof of personal identification to be provided are:

- Full birth certificate (UK and Channel Islands) that must have been issued after the date of birth by the General Register Office or other relevant authority or registrars
- Full birth certificate issued by UK authority 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 paper (UK and Channel Islands)
- Gender recognition certificate
- Deed poll certificate
- Firearms certificate/licence (UK, Channel Islands or 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 Pension (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 Custom (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 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.

Should the applicant have changed their name recently and therefore cannot provide ID Documents in the new name, then Carejoy Healthcare will only accept identity documents in the applicant's previous name where they are able to provide documentary evidence of the recent name change because of the following events:

- Marriage/civil partnership (i.e. marriage/civil partnership certificate)
- Divorce/civil partnership dissolution (i.e. decree absolute/civil partnership dissolution certificate)
- Deed poll (i.e. deed poll certificate)

Carejoy Healthcare would also investigate acquiring further proofs of identification for candidates who have recently left full time education (aged between 16 and 19 years old), refugees and asylum seekers, along with schemes which support the homeless to obtain the relevant identity documents.

This policy does not outline the checks or documentary evidence required to assess a candidate's right to work. The checks required to verify an individual's legal right to work in the UK are outlined within the Right to Work checks Policy

## IDENTITY CHECKS PROCEDURE

Checking our candidates provide authentic documentation is an integral 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. Carejoy Healthcare make this clear, and ensure our candidates declare authorisation for any document they provide to be checked for authenticity either manually, through an appropriate body and/or using an electronic scanning device should this be deemed necessary or further checks on an identity document if this is deemed necessary.

### For Passport (UK and Overseas):

- The Compliance Team check the general quality and condition of the passport, looking out for page substitution, incorrect numbering of the pages, damage to the cover or spine of the document and poor paper/print quality
- Check that the print is clear and even – print processes are deliberately complex on genuine documents.
- Check the wording of the document, including issue and expiry dates – the spelling in forged or counterfeit documents are common, especially with stamps and visas. Forgers are known for only altering expiry dates of documents, so it is important to check the issue date corresponds
- Check for damage, accidental damage is often used to conceal tampering of a document, so excessive damage is always treated with caution.
- Check photographs for signs of damage or for excessive glue – this could indicate that the photo has been substituted.
- Check for the embossed stripe 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 and country of origin. Unofficial travel documents in the name of a non-existent countries or countries no longer know by their original name are currently in circulation.

For further assurance we check all photographic Identity documents via the PRADO Consilium site - <https://www.consilium.europa.eu/prado/en/prado-start-page.html>.

In addition, we manually check all passports presented to us to ensure they are genuine:

1. Both strips of the MRZ line have 44 characters. Any more, or less, it is deemed as fake.
2. All the 44 characters are made up of letters, numbers and chevrons. Any different to this and it will be deemed a fake.
3. The second line is in this order: Passport number / Nationality / Date of birth in reverse / gender and Expiry date. Any different to this and it will be deemed a fake.

### For Visas:

- Check for signs of alteration to the passport number or personal and issue details.
- Make sure the details correspond with the information from the individual's passport.
- Check security features e.g. watermarks.
- Check the image for sign of substitution.
- Check for spelling mistakes and wording.

### For Biometric Residence Permits:

- All candidates Biometric Residence Permit cards are checked, and a check is retained on file via the <https://www.gov.uk/prove-right-to-work> website.

### For Photo-card driving licences:

Nowadays, driving licences contain very similar security features to those present within Passports...however, we check the following:

- Damage or adjustments
- Printed information
- Watermarks and security features are intact

- The photograph will always be in greyscale, so we check this and that it matches the applicants other photo identification
- Check the biographical information matches the information the applicant has provided

**For UK Citizen photo-cards:**

- Check the card the PASS (Proof of Age Standards Scheme) hologram. This signifies the card is genuine and is recognised as a valid ID under the law.
- The colour photo confirms the person presenting the card is the lawful card holder
- Every citizen card displays UV markings in the form of two “100% proof” logos

**For Birth Certificates:**

- Birth certificates are not wholly reliable for the purpose of verifying a person’s identity as copies can be easily obtained but certificates that are issued shortly after the time of the birth are more reliable than recently issued duplicates so we do ask our candidates where possible to provide this if they do not have other proof of identification.
- If they do not hold the original, then we will accept a copy if it states “certified copy” from the General Register Office on the certificate.
- The quality of the paper will be of genuine certificate high grade
- There should be a watermark when held up to the light
- The surname only should be entered in upper case not any forenames

We also follow [www.gov.uk/government/organisations/identity-and-passport-service](http://www.gov.uk/government/organisations/identity-and-passport-service) for further Birth Certificate advice.

**Carejoy Healthcare’s standard identification check process:**

A minimum of 2 proofs of their current address dated within the last 3 months and in line with the Government Good Practice Guide. All documents are put through the TrustID on-line system to check validity.

- i. Proof of National Insurance number
- ii. Proof of their right to work in the UK
  - a. Upon receipt of the Right to Work document, the candidate is advised that we will complete the necessary check to confirm authenticity
  - b. Should we feel any discontent with the documents provided we will use our ID Scan machine to create a report based on the numbers, letter, chips and other information within the document
- iii. Photograph
  - a. to be used when the candidate ID Badge is issued for first shift
  - b. also, as another document to validate consistency of identity

Documents are verified using our “Original Sighted” stamp or “Adjusted Check” stamp, which includes the following information;

- i. Signature of the person sighting the document
- ii. Printed name of the person sighting the document
- iii. Job Title of the person sighting the document
- iv. Date sighted

All documents are then scanned to the candidate’s profile – which the candidate will have consented to within their application forms – and maintained as per document expiry or on an annual basis e.g.;

- i. Photo Identification will be updated when the document provided expires
- ii. A minimum of 1 of the 2 proofs of address provided will be updated a year from the issue date of the document to clarify the current address remains the same
- iii. Right to work documentation will be updated as per the date on the document
  - a. If the candidate is non-EU, we will also complete an annual Right to Work check every year from the issue date of the right to work document
- iv. Photograph will be updated every 5 years
  - a. Candidate ID Badge will be issued annually

Candidates cannot be deemed ready for the selection process until their file has satisfied a full check and been signed off as compliant by the Head of Compliance.

Where a document is deemed to not be acceptable either through the visual check or via the on-line scanning service (currently TrustID), the Compliance Team Member, will immediately flag the 'failure' to the Head of Compliance, who will investigate further.

The Head of Compliance will contact the applicant directly to verify this document or identify a new one. Where a complaint document is not made available, the recruitment process will immediately halt.

**Maintenance of Identity Documents**

The maintenance team will contact the candidate to update their identity as per the below timetable, giving the candidate enough time to book into another meeting or post the documents to us ready to copy and update on the file:

<b>PROOF OF IDENTITY</b>	<b>FILE LIFE-SPAN</b>
Passport	As per document
Visa	As per document
Right to Work check – Biometric Cards	Annually from the issue date of the Biometric Card
Right to Work check – ECS	Annually from issue date of initial check
Proofs of address	At least 1 up to date proof requested annually
NI	N/A
Driving Licence	As per document
Birth Certificate	N/A
Proof of name change	As per candidate life event

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Where a document is deemed to not be acceptable either through the visual check or via the on-line scanning service (currently TrustID), the Compliance Team Member, will immediately flag the 'failure' to the Head of Compliance, who will investigate further.

The Head of Compliance will contact the applicant directly to verify this document or identify a new one.

Carejoy Healthcare Ltd follows a stringent process for conducting pre-employment checks of all potential candidates. This policy should be read and applied in conjunction with the policies for the following: right to work checks, professional registration and qualification checks, employment history and reference checks, criminal record checks, work health assessments.

Once approved, the TrustID file and verified documents must be saved to the applicants Credentially.io file in PDF form only for internal and external audit purposes.

**COVID19**

During COVID19 we have been following the Government, APSCo & REC recommendations for the sighting of original documentation whilst face to face interviews and registrations are not possible.

The use of Zoom/Microsoft Teams and other video call applications are utilised to ensure that we are speaking to the correct candidate, and they show us their documents on video then scan or send a clear photograph of the document for their file or they are able to upload their documents directly to their Credentially.io profile following their video call.

**Further detailed guidance:**

The Conduct of Employment Agencies and Employment Businesses Regulations 2003:  
<http://www.legislation.gov.uk/ukxi/2003/3319/contents/made>

Pre-employment screening: a good practice guide. Centre for the Protection of National Infrastructure.  
<http://www.cpni.gov.uk/advice/Personnel-security1/Screening/>

NHS Employers Identity check standard: <https://www.nhsemployers.org/your-workforce/recruit/employment-checks/identity-checks>

PRADO Consilium site: <https://www.consilium.europa.eu/prado/en/prado-start-page.html>

UK Government Policy: [www.gov.uk](http://www.gov.uk)

Department of Health Website: [www.dh.gov.uk](http://www.dh.gov.uk)

UK Border Agency Website: [www.ukba.homeoffice.gov.uk](http://www.ukba.homeoffice.gov.uk)