

General  
Medical  
Council

Executive Board Meeting -  
14 December 2020

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**Agenda item 2  
Identity verification for registration and  
restoration applicants**

<b>Action</b>	To approve
<b>Purpose</b>	<p>The COVID-19 pandemic led to a temporary pause in carrying out in-person identity (ID) checks. Work to restart ID checks highlighted that we don't have a formal policy on ID verification as a pre-requisite for registration and restoration applicants. This has also given us the opportunity to assess our current processes and, as a result, IS propose to introduce a digital technology solution for identity verification.</p> <p>This paper explains, and seeks approval for, an overarching policy setting out how we will conduct ID verification, establishing the principle of a universal process for all applicants applying for registration and restoration to the register. The policy also supports the implementation of a digital solution.</p>
<b>Decision trail</b>	Previously considered by Director of Registration and Revalidation and Directorate Senior Management Team.
<b>Recommendation</b>	To approve the Identity verification policy at Annex A
<b>Annexes</b>	Annex A: Identity verification for registration and restoration applicants
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## **An identity verification policy for registration and restoration applicants**

### *Why are we developing a policy?*

- 1 Our current public position on identity verification is that all applicants for registration or restoration must have an in-person ID check in the UK before we'll grant registration. We see this as necessary to reduce the risk of ID theft and fraud and to maintain the rigour of our registration process.
- 2 Although we've been conducting pre-registration ID checks for over 15 years, we don't currently have in place a formal policy which sets out our reasons and justifications for requiring verification as a pre-requisite for registration.
- 3 Perhaps even more relevant to this proposal are the effects of the COVID-19 pandemic on our ID check process. Before March 2020 in-person pre-registration ID checks took place either at UK medical schools (for UK pre-graduation medical students), or in our Manchester and London offices. The pandemic and related lockdown restrictions meant that we cancelled all face to face ID checks from 18 March – 5 October 2020.
- 4 To maintain a flow of doctors into the UK workforce during that time, we've registered applicants without completing in-person ID checks, flagging this on their LRMP records, and informing them that they'll have to complete an ID check as soon as travel and social distancing restrictions are lifted.
- 5 We've been assessing various options for restarting in-person ID checks for all applicant cohorts, including running socially distanced in-person ID checks in our Manchester and London offices, and remote options such as Skype and digital ID check solutions. Socially distanced in-person ID checks restarted in October 2020 but we have taken the opportunity to consider how we can improve our approach to ID verification. This has involved assessing our objectives in undertaking verification checks and developing a supporting policy.
- 6 Our aim with pre-registration ID verification is to take proportionate steps to confirm that applicants are who they claim to be. Our ID checks also help to reduce the risk of ID theft and fraud; they were introduced in 2004 in response to a number of fraudulent registration applications based on stolen identities. With the rapid increase in technology since 2004, ID theft and fraud has become more commonplace overall and is on the rise in the UK.<sup>1</sup>

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<sup>1</sup> In 2019 the National Fraud Database recorded the highest volume of cases ever, 61% of which related to identity fraud [Fraudscape 2020](#), Cifas

- 7 Against this background, verifying applicant identity is more important than ever and is a key step in the assessment of applications. Our position is that applicants who meet all application criteria (such as demonstrating relevant knowledge, skills and experience) cannot gain registration without passing an identity check.
- 8 The policy set out at Annex A will apply to all applicants seeking registration and every time registrants seek restoration. It clearly explains our reasons for requiring pre-registration identity verification and confirms that our ID verification requirements apply universally, ie all applicants will be subject to the same standard of ID verification.
- 9 The policy also explains the level of assurance we aim to gain from the ID verification process, and the mechanisms we'll use to verify applicant identity (including how we'll deal with situations where applicants can't or don't want to use our preferred verification mechanism). So, while we expect that most applicants will use a digital ID verification system, we'll also offer the option of an in-person ID check in the UK, at a location specified by the GMC.

## Digital ID checks

### *Why move to a digital solution?*

- 10 As noted above the pandemic and its implications for our work has given us an opportunity to consider process renewal, and ID verification is a key example of this. The policy at Annex A is designed to accommodate IS' proposed move to a digital verification solution, which will enable applicants to complete ID checks remotely using smartphone or webcam technology. Applicants will be able to complete ID verification as part of making an application, rather than having to wait until we've conditionally approved, which is the current process for the majority.
- 11 In addition to providing assurance about applicant identity, using a digital ID verification system will increase our flexibility and responsiveness to meet registrants' needs. This will provide an improved customer/stakeholder experience, removing the potentially disproportionate burden on applicants who have to travel to attend our offices for an ID check. We know that ID checks are a significant pain point for IMGs, with applicants reporting that our current in-person UK ID check process is a significant investment in time, energy and money.<sup>2</sup>

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<sup>2</sup> See qualitative research study [GMC IMG IDI QUAL DEBRIEF](#), CGA January 2018

*Level of assurance*

- 12 While we need to assure ourselves of applicant identity, we acknowledge that our aim is to take reasonable steps to verify that applicants are who they claim to be. The system we'll put in place will be in line with confidence level 1 in the [UK Government's guidance](#) on proving and verifying identity.
- 13 It's important to note that ID verification is only one part of our registration assurance processes, and we have other systems<sup>3</sup> in place to give us reassurance that applicants are appropriately qualified and fit to practise. Those systems aren't covered by the proposed policy.

*How will the verification system work?*

- 14 Using the digital solution, we'll capture images of applicants<sup>4</sup> and assess whether they physically match their presented ID documentation, either remotely (ie when applicants aren't physically present at the check) or in person. If we conduct ID verification remotely the system will use technology, known as 'liveness detection', to confirm that applicants are physically present at the time their image is captured.<sup>5</sup>
- 15 We'll require applicants to use one piece of photo ID documentation selected from a list of acceptable documents<sup>6</sup> in the verification process, and we'll confirm that this ID documentation is genuine (ie not a forgery or counterfeit document).
- 16 Although the digital system will capture applicants' images and authenticate their ID documentation, the crucial element of this process will remain human

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<sup>3</sup> Such as [Educational Commission for Foreign Medical Graduates](#) (ECFMG) pre-registration primary source verification (PSV) of acceptable overseas medical qualifications submitted by IMGs, and EEA nationals and exempt persons with non-European qualifications.

<sup>4</sup> We'll keep images on record for disclosure on request to employers as part of any pre-employment checks.

<sup>5</sup> Rather than a 'presentation attack' - such as the use of a printed photo, an image or video of a person on a tablet or a 3D mask.

<sup>6</sup> We'll set out in guidance to applicants which documents we'll accept; documents likely to be acceptable are valid international passports and national identity cards confirming the bearer's nationality

input from our operational teams, who'll make the final manual comparison of the digital output against the applicant's photo and ID documentation.

- 17 There may be some rare cases where restoration applicants cannot provide an ID document from our acceptable list.<sup>7</sup> In these circumstances only we will accept alternative (non-photo) evidence, which we will consider on a case-by-case basis. We will still capture an up-to-date image of these applicants as we will for applicants with current photo ID documents.

*Considerations relating to a technological solution*

- 18 In moving to a digital ID solution, we are mindful of the need to treat all applicants fairly and equitably, and of the recent UK Court of Appeal judgment<sup>8</sup> restating the responsibility of public sector bodies to uphold the Public Sector Equality Duty (PSED). The judgement was clear that public bodies must ensure that they fully investigate the potential for bias or discrimination in the use of privately manufactured technology such as biometric facial recognition systems.
- 19 The digital ID tendering process run by IS will ask suppliers for information about how their systems perform in relation to equality and diversity characteristics, to take account of the Court's judgement that public authorities cannot rely on a lack of evidence or information from a private software manufacturer to discharge the PSED.<sup>9</sup>
- 20 It's important to note that the proposed digital solution is different from automatic facial recognition (AFR). Although both systems use the same technology and can verify that an image of a human face matches another image, AFR compares a captured image against a database of images.<sup>10</sup>
- 21 Facial mapping/comparison, on the other hand, uses technology to compare two images of the same person, typically where a trusted source image (such as from an authenticated identity document like a passport) is available to

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<sup>7</sup> Likely to be long-term UK residents who don't have any form of photo ID.

<sup>8</sup> R (on the application of Edward Bridges) v The Chief Constable of South Wales Police [2020] EWCA Civ 1058; August 11, 2020 (see [judgment](#) for detail)

<sup>9</sup> Where for example a manufacturer refuses to reveal for confidentiality reasons the demographic composition of the dataset of faces on which the software was trained.

<sup>10</sup> This kind of system is often used by police forces to search databases of images of known criminals to try to match individuals; use of this recognition technology in this way resulted in the Court of Appeal case referred to at paragraph 18.

compare against a real-time image, and commonly uses document verification and facial comparison together.<sup>11</sup> This kind of system can be used in-person or remotely, and is the type of system we may use to compare applicants to their passport/ID documentation photos.

- 22** Facial biometric technology has the potential to make the ID verification process faster and more robust, and in future this technology may be explored to match applicants to their ID documentation photos.<sup>12</sup> But the solution we implement must not disadvantage any group of applicants, or any applicants with protected characteristics. This is particularly relevant to the use of facial biometrics when matching applicants to their ID documentation.
- 23** For that reason, we aim to introduce a proportionate solution (described at paragraphs 14-16). At this point this will not include the use of facial recognition technologies and will only be used to support our human decision-making process.

#### *In-person ID checks in the UK*

- 24** Although a digital ID solution can offer significant benefits to many applicants, we acknowledge there will be some applicants who might be unable to use such a system, perhaps because they lack access to the necessary technology. Other applicants may be reluctant to use a digital system, perhaps prompted by concerns about data privacy. There may also be circumstances where the digital solution cannot confirm the validity of an applicant's ID documentation. To cover these situations, we propose to retain in-person ID checks in the UK, at a location specified by the GMC, to ensure we can offer an alternative option for applicants.
- 25** We will also continue to use in-person ID checks to verify the identity of applicants taking PLAB 2, on the day of the test. This is to guard against imposters taking the test in an applicant's place.
- 26** There may also be circumstances where our ID verification systems cannot confirm (either digitally or in person) the validity of an applicant's ID

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<sup>11</sup> <https://www.onespan.com/blog/biometric-identity-verification-difference-between-facial-recognition-and-facial-comparison>

<sup>12</sup> Any decision to change the technology used for ID verification would have to be agreed by Executive Board and with full consideration of the equality, diversity and inclusion impacts.

documentation. In these circumstances applicants will need to have their ID documentation verified by a recognised and trusted source.<sup>13</sup> Responsibility for obtaining this verification will rest with applicants, but we'll usually expect to receive verification directly from the authority and we'll take steps to authenticate all responses we receive. In certain exceptional circumstances we may contact the authority directly to obtain verification; for example (but not limited to) when an authority will only accept a verification request from the GMC rather than the applicant.

### *Exceptional circumstances*

- 27 Although the policy at Annex A sets out the circumstances which will usually apply to ID verification, there may be exceptional circumstances when we consider it appropriate or necessary to verify an applicant's identity outside the terms of the policy.
- 28 We envisage this would usually be where information contained in an application raises broad concerns about the applicant, eg this might apply to licence to practise applicants who already hold registration but who haven't ever had their identity verified. Our aim, however, is to apply the policy as universally as possible and limit the circumstances in which we'd need to consider ID verification outside the its general terms.

### *Equality, diversity and inclusion*

- 29 The vast majority of applicants already have pre-registration ID checks in our current process, so this policy will have limited effect in requiring small numbers of applicants to have their identity verified when they don't currently.
- 30 The biggest change will be implementing a digital ID verification solution. While we expect this will simplify the process and remove some practical barriers for applicants (such as the need to travel to the UK for an ID check), we are alert to the potential for digital ID solutions to have a discriminatory effect. As set out in earlier paragraphs we will assess the specific potential impacts and review any known equality issues when we see the actual digital systems which are available.

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<sup>13</sup> Examples of trusted sources include an applicant's home country's official representation (eg the embassy or diplomatic function) for passports or ID cards, or the Driver and Vehicle Licensing Agency for UK driving licences.

- 31 In future we'll review equality data<sup>14</sup> on applicants using the new ID verification system to identify patterns/trends, such as applicants who can't or don't want to use the digital system. We'll also monitor enquiries and correspondence to the Contact Centre and Complaints & Correspondence team.
- 32 We'll keep the ID verification policy under regular review and make amendments where necessary. This will help us mitigate against any unintended consequences in relation to equality, diversity and inclusion.

### Next steps

- 33 Following approval of this paper and policy, we will implement the new policy in tandem with the new digital verification system, expected to be by the end of February 2021. This will include:
  - a publishing the new policy and guidance for applicants on our website, to ensure transparency
  - b updating relevant operational guidance and training relevant teams to reflect changes to processes.

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<sup>14</sup> In 2019, we extended our data gathering to reach all registered doctors and now ask them to disclose information covering all nine protected characteristics. However, our targeted campaigns have focused on disability status, sexual orientation, and religion or belief. We have reliable data gathered over several years about doctors' age, gender, nationality and ethnicity.

## Identity verification for registration and restoration applicants

### Introduction

- 1 This policy explains our approach to carrying out identity verification (ID) checks on all applicants seeking GMC registration or to restore to the register. It sets out why we carry out ID checks, the level of assurance we are seeking, who the policy applies to, and the types of checks we offer.

### Why do we verify applicant identity?

- 2 Identity (ID) verification is necessary to enable us to comply with our statutory obligations set out in the Medical Act 1983 ('the Act'), to reduce the risk of ID theft and fraud, and to maintain the rigour of our registration process.
- 3 Our over-arching objective in exercising our statutory functions, as set out in S1(1A) of the Act, is the protection of the public, including the following objectives:
  - a to protect, promote and maintain the health, safety and well-being of the public,
  - b to promote and maintain public confidence in the medical profession.
- 4 In addition to meeting the overarching objective, we have a statutory obligation<sup>1</sup> to maintain a register of suitably qualified and fit to practise medical practitioners.
- 5 Pre-registration ID verification is a vital part of the assurance framework we have in place to ensure that we fulfil this obligation, and to maintain the ongoing integrity of the register. There are clear patient safety risks if we grant registration to applicants who aren't who they claim to be.
- 6 By requiring pre-registration ID verification, we aim to take proportionate steps to confirm that applicants are who they claim to be, and to help to reduce the risk of ID theft and fraud. ID theft and fraud has become more commonplace

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<sup>1</sup> Section 2(1) of the [Medical Act 1983](#).

overall and is on the rise in the UK and, against this background, verifying applicant identity is more important than ever.

- 7 Our policy and processes are in line with level one assurance as defined in the [UK Government's guidance](#) on proving and verifying identity.

#### **Which applicants must have their identity verified?**

- 8 Our ID verification requirements apply universally, and all applicants will be subject to the same standard of ID verification.
- 9 All applicants for registration and restoration will have their identity verified before we'll grant registration or restoration. This is irrespective of their route to registration, location in the world at the time of application, or if their identity has been previously verified by the GMC.
- 10 For clarity, the paragraphs below explain how the policy will be applied to particular cohorts of applicants.
- 11 UK pre-graduate medical students applying for provisional registration (PR) will follow the same ID verification processes as other applicants.
- 12 Applicants applying for temporary registration as visiting eminent specialists (s27A of the Medical Act) and special purpose registration (s27B of the Medical Act) will have their ID verified each time they make an application for temporary registration, even if they've previously held registration.
- 13 Restoration applicants will have their identity verified each time they apply for restoration. For the majority, ID verification will take place before their restoration application is approved. Applicants eligible for fast-track restoration may have their identity verified after their application has been approved in order to support their re-entry into the workforce. Fast-track restoration applicants will be required to complete the identity verification process within three months of restoration to the register.
- 14 Applicants taking the PLAB 2 test will have their identity verified in person, on the day of the test itself.
- 15 This policy does not apply to licence to practise applicants who already hold registration, however, unless there are exceptional circumstances.

### How will we verify applicants' identity?

- 16 All applicants will be offered a digital ID check but will be able to request an in-person ID check, at a location specified by the GMC, if this suits their needs better.
- 17 We'll capture applicants' images, either remotely (ie when they aren't physically present at the check) or in person, and use them to assess whether applicants physically match their presented ID documentation.
- 18 If we conduct ID verification remotely our system will use technology to confirm that applicants are physically present at the time their image is captured. We'll also keep these images on record, for disclosure on request to employers as part of any pre-employment checks.
- 19 Applicants will be required to use one piece of photo ID documentation in the verification process, which they can select from a list of acceptable documents.<sup>2</sup> Through our verification process we'll confirm whether this ID documentation is genuine (ie not a forgery or counterfeit document).
- 20 ID verification is only one part of our registration assurance processes. We have other systems in place to give us reassurance that applicants are appropriately qualified and fit to practise which aren't covered by this policy.

#### *Digital ID verification*

- 21 Digital ID verification provides the level of assurance we require and reduces the travel burden on applicants. It enables applicants to complete ID checks remotely while their application is being assessed (without having to attend an ID check appointment in the UK) using smartphone or webcam technology.
- 22 The digital ID verification system will capture an image of applicants, conduct a 'liveness detection' check (to establish that they are physically present at the point of image capture), and will verify that the ID documentation is genuine. Our operational teams will make a final manual comparison of the output from the digital system against applicants' photos and ID documentation.

#### *In-person ID checks in the UK*

- 23 There will be some applicants who might be unable or unwilling to use a digital ID verification system, for a variety of reasons. These applicants will be offered the option to book and attend an in-person ID check in the UK, at a location

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<sup>2</sup> Documents likely to be acceptable are valid international passports and national identity cards confirming the bearer's nationality.

specified by the GMC. Our objectives in carrying out in-person checks are the same as for digital ID verification.

- 24 There may also be circumstances where our ID verification systems cannot confirm (either digitally or in person) the validity of an applicant's ID documentation. In these circumstances applicants will need to have their ID documentation verified by a recognised and trusted source; examples include applicants' home country's official representation (eg an embassy or diplomatic function) for passports or ID cards, or the Driver and Vehicle Licensing Agency for UK driving licences.
- 25 Responsibility for obtaining this verification will rest with applicants, but we will give formal confirmation of the information we require, which can be provided to the appropriate authority. We will usually expect to receive verification directly from the authority and we will take steps to authenticate all responses we receive. In certain exceptional circumstances we may contact the authority directly to obtain verification; for example (but not limited to) when an authority will only accept a verification request from the GMC rather than the applicant.

#### **Exceptional circumstances**

- 26 Although this policy sets out the circumstances which will usually apply to ID verification, there may be exceptional circumstances when we consider it appropriate or necessary to verify an applicant's identity outside the terms of the policy.
- 27 We envisage this would usually be where information contained in an application raises broad concerns about the applicant. Our aim, however, is to apply the policy as universally as possible and limit the circumstances in which we'd need to consider ID verification outside the general terms of the policy. In these situations, we will explain clearly to applicants the reasons for requesting they complete the verification process.

POLICY APPROVED: XX DECEMBER 2020