

Doctors, PAs, and AAs: Identity verification for registration, restoration, and re-entry applicants

Introduction

- 1 This policy explains our approach to carrying out identity (ID) verification checks on all applicants seeking entry to our registers¹ for the first time, as well as restoration² or re-entry³ to those registers. 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.
- 2 Where we refer to ‘applicants’ in the policy, the provisions apply to all three groups of our registrants (doctors, physician associates (PAs), and anaesthesia associates (AAs)). Where there are different requirements for different registrant groups, we refer to them individually (ie doctors, PAs, and AAs) in the policy.
- 3 In line with good practice, we’ll regularly review this policy to ensure it remains up to date, fair, proportionate, and effective.

Why do we verify applicant ID?

- 4 ID verification is necessary to enable us to comply with our statutory obligations set out in both the Medical Act 1983 (the Act) and the Anaesthesia Associates and Physician Associates Order 2024 (the AAPAO)⁴, to reduce the risk of ID theft and fraud, and to maintain the rigour of our registration processes.
- 5 Our overarching objective in exercising our statutory functions, as set out in the legislation⁵ is the protection of the public, including the following objectives:
 - to protect, promote and maintain the health, safety, and well-being of the public

¹ The register of medical practitioners, the GP and specialist registers, and the register of PAs and AAs.

² Restoration applies only to doctors.

³ Re-entry applies only to PAs and AAs.

⁴ Article 6(4)(a) of the AAPAO requires applicants for registration and re-entry to the register of PAs and AAs to provide proof of their identity to the Registrar with their applications.

⁵ Section 1(1A) of the Act and schedule 1, paragraph 3(1)(a) of the AAPAO.

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- to promote and maintain public confidence in and proper professional standards and conduct for, the professions we're responsible for regulating.
- 6 In addition to meeting the overarching objective, we have statutory obligations⁶ to maintain (separate) registers of doctors and of PAs and AAs, who are suitably qualified and fit to practise, and who meet the standards and requirements for registration.
 - 7 Pre-registration ID verification is a vital part of the assurance framework we have in place to ensure that we fulfil these obligations, and to maintain the ongoing integrity of our registers. There are clear patient safety risks if we grant registration to applicants who aren't who they claim to be.
 - 8 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 overall and is on the rise in the UK and, against this background, verifying applicant ID is more important than ever.
 - 9 Our policy and processes are in line with level one assurance as defined in the UK Government's Good Practice Guide (GPG) 45⁷ on proving and verifying ID.

Which applicants must have their ID verified?

- 10 Our ID verification requirements apply universally, and all applicants will be subject to the same standard of ID verification.

Doctors, PAs, and AAs taking GMC-approved pre-registration assessments

- 11 Doctors using the PLAB pathway to registration, and all PAs and AAs, must take and pass GMC-approved pre-registration assessments before they can apply for registration. For doctors this assessment is the Professional Linguistic Assessments Board (PLAB 1 and PLAB 2) test. For PAs and AAs it's the PA Registration Assessment (PARA) and AA Registration Assessment (AARA) respectively.

⁶ Section 2(1) of the Act; Article 5(1)(a) of the AAPAO.

⁷ Good Practice Guide (GPG) 45 [How to prove and verify someone's identity - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/how-to-prove-and-verify-someone-s-identity)

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- 12** PLAB 1, the PARA and the AARA are all administered on our behalf by approved organisations⁸ and ID checks following local arrangements⁹ will be in place on the day of the assessment¹⁰ to ensure that the candidates are who they claim to be and that the correct candidates take the assessments. ID checks carried out for the purposes of taking the PLAB 1, PARA and AARA assessments are additional to, and don't replace, the requirement for full GMC registration application ID checks (see below for details).
 - 13** PLAB 2 is held at our assessment centre sites¹¹ and there are specific ID check arrangements for candidates, who'll usually have their full GMC ID check in person, on the day of the test itself¹². Successful candidates can use their PLAB 2 ID check for their subsequent registration application (while the PLAB 2 result remains valid¹³). Any PLAB 2 candidate who doesn't have their ID verified on the day of the test will need to complete an ID check as part of any subsequent registration application they make.

Applicants for registration, restoration, and re-entry to the registers

- 14** All applicants for registration, restoration, and re-entry to the registers, will have their ID verified before we'll grant their applications. This is irrespective of their profession, route to registration or re-entry, location in the world at the time of application, or if we've previously verified their ID.
- 15** We'll have received evidence of all applicants' identity before we carry out ID verification, and our guidance sets out the different ways in which this applies across different applicant cohorts. The paragraphs below explain how we'll apply the ID verification policy to particular applicant cohorts.
- 16** We'll verify the ID of UK pre-graduate medical students applying for provisional registration during their final academic year, using the same ID verification processes we use for other applicants. This verification will remain valid during applicants' final academic year only, and

⁸ Currently: VICTVS for UK and EU based PLAB 1 exams and the British Council for PLAB 1 exams taking place outside the UK and EU; Royal College of Physicians (although this may change in future) for the PARA, and likely to be the same suppliers as PLAB 1 for the AARA.

⁹ External exam invigilators will check candidates' ID before they're allowed to take the assessments.

¹⁰ Candidates must bring proof of identity to the assessment.

¹¹ In Manchester, UK - [When and where can you take PLAB 2? - GMC \(gmc-uk.org\)](#)

¹² See [PLAB 2 guide - what can you expect on the day?](#)

¹³ Usually two years – see [What do you do after the exam - PLAB 2 guide - GMC \(gmc-uk.org\)](#).

applicants who apply for provisional registration outside of their final academic year will need to have their ID verified again when they apply for provisional registration.

- 17** Doctors applying for temporary registration for visiting eminent specialists and / or special purpose registration¹⁴ will have their ID verified each time they apply for temporary registration, even if they've previously held registration.
- 18** Restoration and re-entry applicants (doctors and PAs / AAs respectively) will have their ID verified each time they apply for restoration or re-entry. For most applicants, verification will take place before we approve their application. Doctors eligible for fast-track restoration may have their ID verified after we've approved their application, to support their re-entry into the workforce. Doctors applying for fast-track restoration will be required to complete ID verification within three months of their restoration to the register.
- 19** Unless there are exceptional circumstances, such as not having had a previous GMC ID check, this policy doesn't apply to applications for:
 - a licence to practise, from registered doctors
 - full registration, from provisionally registered doctors
 - specialist and / or general practice registration, from fully registered doctors.

How will we verify applicants' ID?

- 20** We'll offer all applicants a remote ID check using digital technology, but they'll be able to request an in person ID check, at a location we specify, if this suits their needs better.
- 21** We'll capture applicants' images (either remotely or at an in person check) and use them to assess whether applicants physically match their presented ID document. In remote digital ID verification we'll use technology to confirm that applicants are physically present when their image is captured. We'll keep these images on record, for disclosure on request to employers as part of any pre-employment checks, or for use in future ID checks.
- 22** ID verification is only one part of our registration assurance processes. We have other systems, which aren't covered by this policy, to give us reassurance that applicants are appropriately qualified, fit to practise and meet the relevant standards and requirements for registration.

¹⁴ Under sections 27A and 27B of the Act respectively.

Which ID documents will we accept?

- 23** Applicants will be required to use one photo ID document in the ID verification process, which they can select from a list of acceptable documents (set out in separate guidance on our website). Our verification process will confirm whether this ID document is genuine ie not a forgery or counterfeit document.
- 24** We accept a broad range of ID documents but recommend that applicants use a passport¹⁵ when completing an ID check, as passports are likely to enable us to progress applications most effectively. Applicants can choose to use ID documents other than passports from our acceptable list but doing so may sometimes mean that we'll need to undertake further checks, in addition to the steps that our ID provider takes, as an extra security measure.

Remote digital ID verification

- 25** Remote digital ID verification provides the level of assurance we require and increases accessibility for applicants by reducing their travel burden, while also making our processes more flexible and resilient. It enables applicants to complete ID checks using smartphone technology, while we're assessing their application, without having to attend an in person ID check in the UK.
- 26** Remote digital ID verification is carried out on our behalf by an established and leading independent ID provider whose ID verification system will capture separate images of the applicant and their ID document and will verify that the ID document is genuine. The system will also use facial biometric recognition technology to confirm that the applicant is physically present at the point of image capture and to compare that image to the applicant's ID document to establish whether they match.
- 27** In some circumstances our ID provider will manually review the output from remote digital ID checks, using specially trained staff. This process will help to ensure that applicants are able to successfully complete their ID checks but will also act as a security measure to guard against ID fraud. Examples of when this might be necessary are where:
- there was user error during the ID check process
 - the system didn't recognise that the user was physically present at image capture

¹⁵ Passports are felt to be the most reliable and comprehensive source of information about applicants and are more likely to be processed successfully by the remote ID verification system.

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- the system couldn't match the applicant to their ID document.
- 28** The final step in remote digital ID verification is that our operational teams will review the digital system's output (which will include AI-driven algorithmic facial biometric comparison) and will make a final manual comparison of the images taken by the digital system against applicants' ID documents. They may also compare these images to any images we have on record of applicants, such as photos provided to us by UK medical schools or PA / AA course providers, or images we've captured during previous ID checks.
- 29** The ID provider's manual review system and our operational manual comparison process will act as crucial mitigations against any potential for bias in the digital facial biometric recognition system. This will ensure that applicant ID verification isn't based solely on the remote digital system's analysis, retaining an element of human intervention.

In-person ID checks in the UK

- 30** Our primary approach to pre-registration ID verification will be to offer remote digital checks to all applicants. We recognise, however, that remote digital checks may not be suitable in all circumstances, for example where applicants:
- are unable or unwilling to use a remote digital ID verification system, for a variety of reasons
 - can't successfully complete a remote digital ID check, for example where technical issues arise during the check, or where the digital system can't confirm the validity of their ID document.
- 31** These applicants will be offered the option to book and attend an in-person ID check in the UK, at a location we specify. Our objectives in carrying out in-person checks are the same as for digital ID verification.

Trusted and recognised source verification

- 32** There may be circumstances where we'll need additional assurance about an applicant's ID document. This is likely to be because we're unable to verify that ID document, either remotely or in person. In these circumstances we'll obtain the extra assurance we need through independent verification of the applicant's ID document by a trusted and recognised source. Examples of trusted sources include the applicant's home country's official representation (eg an embassy or diplomatic function) for passports or ID cards, or the Driver

and Vehicle Licensing Agency¹⁶ / Driver & Vehicle Agency¹⁷ for driving licences issued in the UK.

- 33** Responsibility for obtaining this verification will rest with applicants, but we'll give formal confirmation of the information we require, which applicants can provide to the appropriate authority if required. We'll usually expect to receive verification directly from the authority but, in certain circumstances, we may contact the authority directly to obtain verification. This could be when an authority will only accept a verification request from us rather than the applicant, or where we're able to carry out verification checks ourselves. We'll take steps to authenticate all responses we receive.
- 34** Applicants who've claimed asylum in the UK who are legally able to work¹⁸ in the UK before their asylum claims have been determined, may find it difficult to provide an appropriate ID document from our list of acceptable documents. For these applicants we'll consider (with them and on a case by case basis) the best approach to ID verification, taking appropriate and reasonable steps to accommodate their specific circumstances where possible.

Exceptional circumstances

- 35** 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 ID outside the terms of the policy. This could be where information contained in an application raises broad concerns about the applicant or where strict application may unfairly disadvantage certain applicants or groups of applicants (such as the refugee applicants described at paragraph 34).
- 36** 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.

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¹⁶ For licences issued in Scotland, Wales, and England.

¹⁷ For licences issued in Northern Ireland.

¹⁸ Asylum claimants covered by paragraphs 360, 360A and 360B of [Part 11B of the Immigration Rules](#).