

**GP Online Guidance**

*Identity verification*

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1. Introduction

Most general practice services rely on varying levels and methods of identity verification suitable for their purposes, but access to online services demands a more consistent and robust approach to ensure patient confidentiality while providing secure access to personal and sensitive data.

Patients may obtain an NHS Login where the patient’s identity is verified remotely. However, for practices secure identity verification process is required for patients who apply directly for GP online services. It is necessary to verify patient identity documentation, or individually vouch for patients requesting access to online services.

These processes need to be simple, quick, patient-friendly and not overly demanding for the practice.

This document provides an overview of the process.

1. Verifying Identity

There are three valid ways to verify the identity of the person who is asking for online access.

1. Most patients can prove their identities by presenting **two forms of documentary evidence**: one must include a photo that clearly matches the patient and the other must confirm that the applicants address is the one that you have on your records. Acceptable documents include passports or photo driving licences with photographs and documents bearing the address that are likely to have been posted to the patient such as a bank statement. Bills will not meet this requirement.
2. There will always be some patients (e.g. temporary residents, travellers or young people living with their parents) who do not have acceptable identity evidence. In these cases,
an authorised member of staff, who knows the patient well enough to verify that they are who they say they are, and that no deception is taking place, may be able to **vouch for their identity**. Practices must judge each patient on a case-by-case basis while ensuring that the agreed policy takes into account the duration of registration and frequency of patient contact
3. If neither of these two methods of verification are possible, consider **using information in the patient’s health record** to verify the identity of the applicant. A trained member of staff may be able to satisfy themselves of the applicant’s identity by obtaining responses to questions from information held in the medical records. This should take place discreetly and ideally in a planned appointment. It is extremely important that the questions posed do not incidentally disclose confidential information to the applicant before their identity is verified.

A full list of acceptable documents for identity verification is published by the Cabinet Office in their Good Practice Guide 45 which lists acceptable documents for identity verification.

 i [How to prove someone’s identity, Good Practice Guideline 45](https://www.gov.uk/government/publications/identity-proofing-and-verification-of-an-individual). Cabinet Office and Government Digital Service (2022)

1. Registration process for GP Online Services
* Every member of the practice team should know how to respond if someone asks
for access to the practice online services. They should know who will handle new applications if they are not trained to manage it themselves.
* Practice staff should be aware of the safeguarding risk from online access and be sensitive to indications that an applicant may be vulnerable to being coerced into sharing their online access unwillingly.
* Patients must complete all parts of the application form. You may want to use the RCGP application form template available from the GP Online Toolkit.
* There should be clear advice about the practice policy on checking records for potentially harmful information before record access is switched on. Patients will want to know how long it is likely to take.
* Patients must register in person so that their identity can be verified, after a successful record check for record access. Login details for online services must only be given to the verified patient themselves.
* Decide on the information you want to give patients who are new to your online services or record access. Consider offering all patients verbal and written information about how to activate their account, what they can use it for, how to keep their online access secure, and how to contact the practice if they encounter problems.
* If record access is refused, record the reason for the refusal.
1. Practice protocol

Identity verification protocols must be made available to all staff in each practice to ensure consistent and transparent processes. Protocols must clearly establish the different stages of the identity verification processes, detailing who is involved, what their contributions are and what to do in unusual situations.

Who can verify patients’ identities?

Every practice must decide which members of staff are authorised to perform verification of identities by presented documents and vouching, and record these in their practice protocol.

Document identity verification

Evidence should be entered in the patient record that identity checks have taken place, the nature of those checks, who did them and when, should be recorded. The application form must be completed and signed by the patient and scanned into the patient’s record. A SNOMED CT term can be added to aid searching for the information later.

To avoid non-clinical information being store in patient records, copies of bank statements, passports and other personal documentation used in identity verification must not be scanned and stored in the patient’s clinical record.

1. Reference

[*Identity Verification and Authentication Standard for Digital Health and Care Services,* NHS Digital](https://digital.nhs.uk/data-and-information/information-standards/information-standards-and-data-collections-including-extractions/publications-and-notifications/standards-and-collections/dcb3051-identity-verification-and-authentication-standard-for-digital-health-and-care-services),