GPG 45 - ADVP comments/feedback

The comments in this paper only pertain to the section of the guidance that is titled "Confirm the evidence is valid".

Re the technical issues, there are three principal concerns:

1. **Checking the evidence has not been cancelled, lost or stolen**

Under the requirements to achieve a score 3, GPG 45 states on page 14:

"The person or system doing the check will need to make sure the evidence has not been:

- Cancelled by the organisation that issued it
- Reported as lost or stolen

They can do this by checking an authoritative database of cancelled evidence, for example Interpol for passports or a mobile phone operator for mobile phone contracts."

ADVP members only deal with the validation of identity documents, not utility bills or mobile phone contracts. As such, it has three questions regarding the GPG 45 requirements as set out above:

- How do ADVP members check whether a passport has been reported stolen outside of UK? GPG45 suggests checking against Interpol but every effort an ADVP member has made to access Interpol has been unsuccessful. Could you please confirm whether it is possible to do checks against Interpol as a private company – our understanding is that it is not?
- How do ADVP members check whether a UK government issued identity document has been cancelled? We are not aware that either DVLA or HMPO disclose that data now. We understand that such information may be made available in the future once the current HMPO trial is completed and a decision made to allow checks against HMPO and DVLA, but that is a long way off as we understand it and GPG 45 is relevant today?
- How ADVP members check whether a non-UK government issued identity document has been cancelled?

Is a solution to this challenge to simply insert the words "If available or accessible" when referring to possible databases that can be checked?

2. **Confirm the UV and IR security features are genuine**

Under the requirements to achieve a score 2, GPG 45 states on page 13:

"If the evidence is being checked by a person, they must:

- Be trained in how to detect false documents by a specialist trainer, such as the Home Office, National Document Fraud Unit of CPNI
- Refresh their training at least every three years"

A clear example of where this requirement becomes an issue is as follows:

An NHS Trust deploys a three-light scanner with RFID chip opening capability. The original document is presented by the document holder. All criteria lead to s score 4 level of validation. However, because the user is a HR administrator trained by the technology supplier, then the ADVP interpretation of GPG 45 is that the NHS Trust only achieves Score 2 due to the training requirement set out in the guidance. Many NHS Trusts will continue to use scanners as the initial identity check for the proposed NHS staff digital passport.

The clear issue re the training requirement is the obvious lack of suitable resource across government to conduct appropriate training for the private sector (should it even wish to do so). Would a solution therefore be to insert the following alternative words to make the requirement more flexible and appropriate:

- "have clear and evidenced experience in the checking of identity documents or be trained in how to detect false documents by a specialist trainer such as Home office, NDFU or CPNI or other competent private company or government agency"

3. Confirm the visible security features are genuine

Under the requirements to achieve a score 2, GPG 45 states on page 11:

"If the evidence is being checked in person, whoever is doing the check must make sure:

- The original evidence has been shown
- They do not accept scans, photos, or photocopies of the evidence (this is because it can be difficult to tell if these have been forged or counterfeit)"

Whilst the ADVP understands the rationale to this requirement, it feels more clarification needs to be given to Cloud based validation systems that do validate images of identity documents. The checker may still have seen the original document via videolink (not in person) and asked for a photograph of the document to be submitted to a portal via an email link/app. It is this image that is then validated by technology/analysts supplied by the ADVP member company. Such checks of images are proven to be more robust in detecting counterfeit documents than an untrained person seeing an original document. Clarification of this option would be very beneficial in the guidance and the ADVP would be very happy to work with GDS on appropriate wording.

The final issue the ADVP wishes to raise is that of the proposed use of GPG 45 going forwards. The ADVP has two principles interests in GPG 45:

1. **Digital identity** – GPG 45 is going to be a major factor in creating a secure and robust digital identity ecosystem in the UK. Potential IDPs will either have their own document validation technology or look to ADVP members to provide. As such, questions regarding levels of confidence as set out in the Identity Profiles section of GPG 45 will become increasingly common. Moving from a score 4 to a Score 2 on validation due to lack of clarity re training will have an unnecessary detrimental impact on the overall level of confidence achieved.
2. **Document validation in the non-digital environment** – GPG 45 is a live guidance document and is increasingly being used by companies in their evaluation of validation requirements. ADVP members are already seeing an increase in queries regarding how their validation technology measure against GPG 45. The ADVP welcomes this level of assessment, however, it also feels the guidance must address the technical issues raised above to ensure

there is no misunderstanding of how electronic validation can enhance overall confidence levels. The ADVP concern is that non specialist readers of the document (as is currently drafted) will not understand some of the carefully used words that are not meant to be prescriptive and therefore feels the language needs to be more obvious and not open to misinterpretation.

The ADVP hopes the comments set out in this document are helpful and constructive and looks forward to a response in due course.