

By email:

The Rt Hon Peter Kyle MP, Secretary of State for Science, Innovation and Technology
James Murray MP, Exchequer Secretary to the Treasury
The Rt Hon Liz Kendall MP, Secretary of State for Work and Pensions
Helen Wylie, Chief Digital and Information Officer, DWP

Cc:

Feryal Clark MP, Parliamentary Under-Secretary of State for AI and Digital Government, DSIT
Sir Chris Bryant MP, Minister of State for Data Protection and Telecoms, DSIT
Christine Bellamy, Government Chief Product Officer, GDS (DSIT)
Joanna Davinson, Interim Government Chief Digital Officer, GDS (DSIT)
Lindsay Mason, Interim Government Chief Data Officer, GDS (DSIT)
Daljit Rehal, Chief Digital and Information Officer, HM Revenue & Customs
Andrew Western MP, Parliamentary Under-Secretary of State (Minister for Transformation), DWP

Digital Status Services Stakeholder Forum (Home Office)
Independent Monitoring Authority

26 August 2025

Dear Secretary of State for Science, Innovation and Technology, Exchequer Secretary to the Treasury, Secretary of State for Work and Pensions and DWP Director General,

Non-British citizens excluded from UK Government online services

I am writing to raise our continued concern about the barriers to accessing UK Government online services, including critical HMRC and DWP services to manage income, tax, benefit and pension data and payments.

The3million is the largest grassroots organisation representing EU citizens who made the UK their home before Brexit and who were the first cohort to receive digital-only immigration status, now known as an eVisa, through the EU Settlement Scheme (EUSS), starting from late 2018.

Many among this cohort experienced problems resulting directly from the fact that the EUSS introduced the concept of a digital identity checking app that reads the chip in the individual's identity document (e.g. passport). The Home Office made a fundamental design choice in which an individual's identity document becomes the unique access key to viewing and proving their immigration status, and to use the information read from that document's chip as the 'single source of truth' of their name.

The fundamental problem with this approach is that it fails to recognise the many different ways in which the name read from an identity document's chip can diverge from a person's full and proper name displayed elsewhere in their identity document. There are internationally standardised ways in which these names can

diverge, as clearly set out by the International Civil Aviation Authority in their standards on Machine Readable Travel Documents.¹

We have done a significant amount of work over the last 7 years to engage with the Home Office and seek solutions and workarounds to these problems for a substantial minority of EUSS applicants and status holders. Since 2024 these same problems have expanded to almost all UK migrants due to their immigration status also being migrated to the digital-only eVisas.

However, these problems are not restricted to the Home Office, but rather are being propagated through other UK Government departments.

This is partly due to the use of APIs (Application Programming Interface) between Government departments and the Home Office², and partly because Government Digital Service has introduced its own identity checking app as part of its GOV.UK One Login programme and available as an identity checking option when creating a Government Gateway account.

The core design flaw inherent in this, namely the error in treating someone's name as read from their identity document chip as their full name, is therefore continuing to impact the same set of individuals, for the same technical reasons.

We are seeing people unable to create Government Gateway accounts, and thereby unable to access critical, essential HMRC and DWP services. We have reports of these individuals struggling to convince the NHS, the DVLA, the Student Loans Company and Local Authorities of their identity, lawful status and rights flowing from their lawful status.

This is therefore causing problems similar to those seen in the Windrush scandal in the sense that people who **have** rights are unable to **prove** those rights, and therefore face obstacles to going about their daily lives or worse, fall victim to the regulations of the Hostile Environment.

In the case of creating a Government Gateway account, there does not appear to be any solution to the issues identified, and individuals are finding it very challenging to reach UK Government helplines to find alternative workarounds to access the services that typically require a Government Gateway account. Whereas in the past people were able to use services like GOV.UK Verify³ through the Post Office⁴ or other services to verify their identity, now if the Government Digital Service's app cannot verify a person's identity, and the person does not already have the requisite list of HMRC documents (such as British passport, UK driving licence, credit record, P60s or payslips, previous self-assessment returns⁵) they are unable to set up an account. We set out the technical details and impacts in more detail below.

The mismatch, between a person's name as read from the passport chip and a person's correct name as held by Government departments, has already caused problems to those eligible for status under the EUSS. In 2021, data sharing between the Home Office and HMRC / DWP resulted in EUSS status holders receiving letters threatening termination of their tax and welfare benefits if they did not apply for EUSS status. We wrote to

¹ International Civil Aviation Organisation (ICAO) - Machine Readable Travel Documents
<https://www.icao.int/publications/doc-series/doc-9303>

² APIs are in use by HMRC, DWP, the NHS, DVLA, Student Loans Company and Local Authorities.

³ See correspondence between the3million and HMRC about the impact of the withdrawal of GOV.UK Verify on non-British citizens

⁴ <https://www.theguardian.com/money/2022/apr/06/hm-revenues-id-rules-are-driving-me-back-to-pen-and-paper>

⁵ As listed as part of answer to Q10 in HMRC reply to the3million, 28 June 2022, available at <https://the3million.org.uk/publication/2022062801>

the Home Office and DWP⁶ about this issue on 23 August 2021. That letter included a section entitled “Difference between name as used by DWP/HMRC and name on (pre-)settled status”.

British citizens are less likely to be impacted by these issues than non-British residents in the UK, as we explain in more detail later in this letter.

We are concerned that the public authorities are breaching their general duty under the Public Sector Equality Duty, as certain groups of people with a protected characteristic are disproportionately impacted by these failures.

We are furthermore concerned that, for beneficiaries of the EU-UK Withdrawal Agreement, the public authorities are breaching the following Articles of that Agreement:

- Article 12 (Non-discrimination), which “*prohibits any discrimination on grounds of nationality within the meaning of the first subparagraph of Article 18 TFEU*”.
- Article 23 (Equal treatment), which states that “*all Union citizens [...] residing on the basis of this Agreement [...] shall enjoy equal treatment with the nationals of that State*”
- Article 24.1(e) (Rights of workers), which states that “*workers [...] shall enjoy the rights guaranteed by Article 45 TFEU and the rights granted by Regulation (EU) No 492/2011 of the European Parliament and of the Council. These rights include: [...] (e) the right to social and tax advantages;*”

We ask that you give this your most urgent attention, and implement measures to allow equal opportunities for all non-British citizens living lawfully in the UK to access essential UK Government services.

The remainder of this letter sets out:

- The **three identity checking apps** in use by the UK Government
- The **fundamental design problem** inherent in these identity checking apps
- Examples of the **impacts** caused by the inability to create a Government Gateway account
- **Lack of mitigation** for the inability to create a Government Gateway account
- **Government inter-department APIs** and how these do not solve the problem

We then conclude with a set of questions that we would appreciate answers to at your earliest convenience.

Three identity checking apps in use by the UK Government

- In November 2018, the Home Office introduced the use of the identity checking app: ‘[EU Exit: ID Document Check](#)’⁷. This app forms part of the process to apply for UK immigration status under the EUSS. It can only be used by holders of biometric EU, EEA or Swiss passports or national identity cards, or holders of UK-issued biometric residence cards (BRCs). It has been used by approximately 6 million people.

⁶ Correspondence to DWP and the Home Office available at <https://the3million.org.uk/publication/2021082301>

⁷ <https://www.gov.uk/guidance/using-the-eu-exit-id-document-check-app>, available in the Google Play Store at <http://play.google.com/store/apps/details?id=uk.gov.HomeOffice.ho1> and the Appstore at <https://apps.apple.com/gb/app/eu-exit-id-document-check/id1478914184>

- In September 2020, the Home Office launched another identity check app: '[UK Immigration: ID Check](#)'⁸. It can be used to apply for immigration status (outside the EUSS), but only by holders of biometric EU, EEA, Swiss citizens, BNO or HKSAR passports, or holders of biometric residence permits (BRPs).

It can also be used by holders of any nationality passport that has a biometric chip, or holders of biometric residence permits, for uses other than applying for immigration status:

- Identify verification as part of setting up a UKVI account to gain access to an eVisa (to date this has been done by around 4 million individuals⁹)
 - Maintaining an eVisa to link new identity documents (this is an ongoing requirement for travel to the UK)
- In October 2022, Government Digital Service released a third identity check app: '[GOV.UK ID Check](#)'¹⁰. This can be used by holders of UK driving licences, UK passports, non-UK passports with a biometric chip, or by holders of biometric residence permits, biometric residence cards and UK Frontier Worker permits up to 18 months after their expiry date.

When setting up Government Gateway accounts, it can be used as an alternative identity verification method to HMRC's existing methods of identity verification (such as providing P60s, UK driving licence, or credit references). It is also used when signing into a government service with GOV.UK One Login.

The fundamental design problem inherent in these identity checking apps

As mentioned above, often, the name as stored in the identity document chip does not match the person's correct name, for reasons relating to international passport standards (ICAO¹¹) and national legislation governing the issuance of identity documents.

We set out a lot of these problems, and examples of their impact, in a briefing note: [Note on various eVisa problems when someone's name as stored in the Machine Readable Zone \(MRZ\) of a passport or other identity document is different to their full name](#).¹²

Common examples of differences between someone's full name in the Visual Inspection Zone (VIZ) of an identity document, and their name as shown in the Machine Readable Zone (MRZ) and stored in the chip of that identity document:

- **Married name vs birth name.** Some countries have national legislation that specifies that the MRZ should contain an individual's birth name even when they have changed their name through marriage.

⁸ <https://www.gov.uk/guidance/using-the-uk-immigration-id-check-app>, available in the Google Play Store at <https://play.google.com/store/apps/details?id=uk.gov.HomeOffice.ho2> and the Appstore at <https://apps.apple.com/gb/app/uk-immigration-id-check/id1499891460>

⁹ As at 30 April 2025, 4.3 million individuals who created a UKVI account to gain access to their eVisa <https://www.gov.uk/government/publications/online-immigration-status-evisa-ukvi-account-creation-data>

¹⁰ <https://www.gov.uk/guidance/using-the-govuk-id-check-app>, available in the Google Play Store at <https://play.google.com/store/apps/details?id=uk.gov.documentchecking> and the Appstore at <https://apps.apple.com/gb/app/gov-uk-id-check/id1629050566>

¹¹ As above, International Civil Aviation Organisation (ICAO) - Machine Readable Travel Documents <https://www.icao.int/publications/doc-series/doc-9303>

¹² <https://the3million.org.uk/publication/2025021901>

ICAO standards specify that the married name can be added to the surname in the VIZ by way of 'spouse of / epouse de' notation.

- **Truncation of names.** The MRZ has a character limit, therefore people with long names (e.g. composite surnames, many given names, which is more common for certain nationalities/ethnic groups) will have their name truncated. The ICAO standards specify the proper methods of necessary truncation.
- **Transliteration of characters with diacritics.** When a name has diacritics such as accents or cedillas, ICAO standards of transliterations specify how the name should be stored in the MRZ. For example, a name such as "Müller" can be stored in the MRZ as "MULLER" or "MUELLER" or "MUXLLER", as U, UE and UXX are all ICAO-compliant transliteration options.
- **No secondary identifier.** Some countries do not make a distinction between given names and surnames, and instead only display someone's entire name in the primary identifier (usually containing the surname), leaving the secondary identifier (usually containing the given name(s)) empty. The MRZ captures this through use of double / single "<" delimiters, and will therefore capture someone's entire name as a surname.

All these differences tend to occur far more in non-UK passports than UK passports, as recognised also by HM Passport Office's Knowledge Base¹³ which holds detailed notes about the passports of every nationality:

- In the UK, if a British national wants to change their name through marriage, they would likely get a new British passport issued with their married name. In many other countries, including the Netherlands¹⁴ and France¹⁵ as just two examples, it is generally not possible to do so. Instead the MRZ remains in the birth name, and the VIZ displays a 'spouse of' married name.

This issue generally affects far more women than men.

- Some nationalities more frequently have citizens with long names. For example Spain uses a naming convention known as a Hispanic naming convention, where someone's surname contains both the father's and mother's first surnames, which may be more likely to lead to a name being truncated. Citizens of other nationalities tend to have many given names.
- English is unusual among modern European languages in not having diacritics in common language.
- British passports make use of both the primary and secondary identifiers, therefore do not display the issue of appearing to have only a surname and no given name. However, many cultures across the world use different naming conventions¹⁶.

¹³ <https://www.gov.uk/government/publications/knowledge-base-caseworker-guidance>

¹⁴ <https://www.gov.uk/government/publications/netherlands-knowledge-base-profile>: "The surname of a Netherlands national does not change when they marry."

¹⁵ <https://www.gov.uk/government/publications/france-knowledge-base-profile>: "France documents always address a person by the name shown on their birth certificate, as this name is considered their only legal name throughout life."

¹⁶ <https://www.gov.uk/government/publications/india-knowledge-base-profile>: "Hindu naming convention [for] citizens who live in the south of India, have 1 forename which may include the initial of their father's forename in front of their own forename"

Although the UK Government has knowledge of identity document discrepancies and cultural differences, as evidenced by the HM Passport Office Knowledge Base, the EUSS and the 'EU Exit: ID Document Check' app were developed without apparent due regard to this.

The3million raised these issues from as early as April 2018, once it became clear that both the application process and subsequent proof of status would be digital-only. At this stage the EUSS was still in the early design stage. We raised the issues as part of a list of questions¹⁷ to the Home Office, but were unable to get sufficient engagement from the Home Office at the time. Our questions included:

Q1.21: "What provisions will be made for applicants whose names do not match the name on their passport?"

Some examples:

- *married women must have their maiden name in their passport, with optional "spouse of" (e.g. Netherlands)*
- *it is customary for married women to use a hyphenated "married surname-maiden surname" in everyday life (e.g. Netherlands)*
- *citizens may have a formal name in their passport, but use a different given name all their lives – including on all UK documentation (e.g. Netherlands)*
- *the order of first names and middle names on the passport may not match the name in use in everyday life (e.g. Sweden)"*

Q1.22: "How will the application system deal with characters that cannot be input into a digital system, or a name that exceeds the maximum length expected by the system?"

E.g. German citizens entering "ue" as an alternative to "ü" or "ss" as an alternative to ß; or citizens of countries that use accents and other special characters?"

the3million also engaged with the Home Office through long-running correspondence¹⁸ on the subject of married women who wanted their digital immigration status to display their married name (as shown in the VIZ of their passports) even though the MRZ contains only the birth name.

The Home Office originally insisted *"that status under the EUSS is issued in line with the name recorded in the machine readable zone (MRZ) of an applicant's passport, in order to maintain secure identity and ensure continuity between an individual's status and their immigration document."*, and told applicants that they should simply ask their national governments to change their name on their passports (in contravention of the national legislation of those governments).

The Home Office has since accepted the need for the full name as displayed in the VIZ to be displayed in an individual's eVisa, however at time of writing this is still causing technical difficulties when such individuals wish to link a new identity document to their UKVI account. It must be emphasised that following the implementation of the UK's Electronic Travel Authorisation (ETA) scheme it is now a requirement to link travel documents to UKVI accounts to allow travel back to the UK, so when it is not possible to do so (due to the Home Office systems rejecting such updates due to an incorrectly perceived 'change of name') people face

¹⁷ <https://the3million.org.uk/publication/2018040901>

¹⁸ <https://the3million.org.uk/publication/2024021502>

problems ranging from additional friction when attempting to check-in for their flight all the way through to being denied boarding for a flight (or other journey) back to their home in the UK .

There are also still outstanding eVisa problems regarding diacritics, the lack of secondary identifiers and truncation of names.

The UK Government's rushed transition to 'digital-by-default' has not paid due attention to international identity document standards, or to cultural differences with regard to those identity documents.

As alluded to above, this lack of due regard to how an individual's identity is reflected and stored by the Home Office has been propagated to other departments, including HMRC and DWP, as impacted people are unable to set up a Government Gateway account.

Examples of the impacts caused by the inability to create a Government Gateway account

Individuals frequently approach the3million asking us for help because they cannot create a Government Gateway account. They tell us they need one for a wide variety of reasons, including to:

- Get access to their HMRC / DWP records generally.
- Register as self-employed, in order to become a sole trader.
- Obtain proof of national insurance contributions, including to see if additional contributions can be made for missed years.
- Change their tax code.
- Send a self-assessment before a deadline to avoid a penalty.
- Settle a capital gains tax liability.
- Process a tax refund to which they are entitled.
- Apply for free childcare to which they are entitled.
- Obtain a document from HMRC to prove they are a resident in the UK to avoid double taxation in their country of origin.

We include a few first-hand accounts of their experiences:

- *"I am running into difficulty to prove my identity for the UK online gateway. I worked in the UK and have an NI number. However, I used my married name and so the recognition app cannot link my account with my name (I am French and my passport shows my maiden name). I have tried to get online help with HMRC but they don't seem to have any kind of helpful way to deal with this issue. How can I proceed? Surely, I am not the first one experiencing this issue. Note that I don't have any of the other documents they are asking..."*
- *"I'm a Portuguese citizen living and working in the UK since 2023. I've been trying for the past year to access/create my HMRC personal account, however, using the GOV ID app my identity verification continuously fails. I am not sure of the reason why and the helpline won't help me as well.*

What do you recommend to people going through the same issue that I have? How can I provide the HMRC with the correct data in order to create my personal account?

My problem is that I have used the online helpdesk as suggested, and they always tell me that some of the records they have about me do not match the records I submit. However, due to privacy reasons and fraud prevention they are unable to tell me which step or which information about me is wrong.

I have tried using the phone assistance as well (300 200 3600) but the automated message tells me that I should get assistance online.

I am not sure if this is happening because my name is too long (6 names), because I have special characters (~) in my name or any other reason.

In your experience has there been any way other people have sorted this issue? Is there any way I can update my information/documents with the HMRC? I have tried using the online form provided as well, but they say they cannot identify me as well using the information I have provided."

- *"My identity check keeps failing when the details obtained from my passport do not match the details I provided in the previous part of the Gateway account application. I have used my married name in the UK across all GOV.UK, including HMRC and DWP, but my passport only shows their birth name in the machine-readable zone (MRZ). I contacted HMRC but they are still unable to help me."*
- *"Hello. I need your assistance setting up my personal tax account on GOV.UK. I keep running into the "Cannot confirm your details" error message when doing the Identity Check. I am not originally a UK citizen. Please assist me. I have tried reaching out to HMRC but no one ever picks the calls. Only an answering machine that tells me to "wait, they're connecting me to an advisor" but as I said, there is never an answer. It is truly frustrating. It is a flaw in the algorithm that affects all international passports. I really hope it can be amended."*
- *"I am facing problem with identifying myself on HMRC app because I don't have a surname in my India passport and on my UK Driving License on the first column my full name is available and as I can't use my Indian passport to verify myself because it doesn't have chip in it so I am using my driving license but keep on failing, therefore, please help me what should I do in this case when I don't have a last name. I have tried typing my name entirely into the last name column (to match my driving licence) but typing first name is mandatory on the HMRC gateway website. I have tried everything but utterly failing authentication."*
- *"I was looking for an answer to pass the identity check. I've been stuck since 2 years ago and it's now become more important because I need to apply for a free childcare account. FYI, I'm Malaysian with a Malaysian passport that doesn't separate my name into first and last name. Is there any number I can contact though from HMRC or even their office if I have to go. It's become very annoying."*
- *"Not being able to verify my identity with the HMRC app means that I can not access my individual account, in particular for checking my state pension. After 30 years in the UK where I have contributed to the National Insurance, I want to see if there are any missing years I can contribute to. The deadline for this is the 5th of April 2025. I have called HMRC 7 times, waiting for 30mn each time (although the automated message says the average waiting time is 20mn). Not being able to sort this out means that I could badly lose out on my state pension."*
- *"I am trying to apply for UK pension benefits scheme to pay back years to qualify for British pension. The online UK gov is not allowing me access, as my passport is Irish. How do I get this form can it be*

sent by post if I can not get my UK gov account set up due to identity difficulties online. I understand this application needs to be submitted before April 4 2025. So I need a reply as soon as possible please"

Lack of mitigation for the inability to create a Government Gateway account

As an organisation, we have tried to find out what mitigation measures are in place when people cannot use the GOV.UK ID Check app to successfully verify their identity, and also cannot provide the other records that HMRC asks for to prove their identity in a different way.

In-Person Identity Check for GOV.UK One Login

A blog by Government Digital Service dated August 2023¹⁹ states:

Core to GDS's mission for GOV.UK One Login is our commitment to make sure as many people as possible can easily prove their identity to access government services.

We are therefore excited to announce that we are now working with the Post Office to run an in-person identity check in their branches, for people who need additional support to use GOV.UK One Login.

The in-person service has been created to assist people who want to use GOV.UK One Login, but are unable to use the app or browser journey for identity verification. We've designed this route specifically for users without smartphones, or those who have a low level of confidence in using a digital platform to input their document details. Offering an in-person service allows for a wider range of people to access vital public services online. Once having proved their identity people will, in the future, be able to reuse this to access services across government.

The service is currently in private beta which means that together with the Post Office we are testing the route and making improvements. Once these changes have been made and tested, the service will be fully available to the public.

We were unable to find information confirming that this in-person service was live, so therefore we contacted the GOV.UK One Login helpline on 0300 373 9020.²⁰

As soon as the call is answered, the automated message states:

"Please note you will not be able to prove your identity if your details on the photo ID you are using do not match the details held for you by the service you are trying to access. Please check you have photo ID that matches or use an alternative method to prove your ID."

Choosing the options "for HMRC or Government Gateway inquiries" and then "If you have a HMRC government Gateway inquiry", the call was terminated with an automated message:

"The Gov.uk One Login support team cannot help with HMRC Government Gateway access issues or technical inquiries. You will need to contact HMRC directly on 0300 200 3600."

¹⁹ <https://gds.blog.gov.uk/2023/08/30/the-new-in-person-identity-check-for-gov-uk-one-login/>

²⁰ <https://home.account.gov.uk/contact-gov-uk-one-login>

We therefore tried to call again, but instead chose the option for trying to prove identity using the ID Check App.

We were connected to an agent, and asked how this in-person service worked.

The agent told us that there are several journeys through the identity verification process, and that some people are offered the option to go to a post office with photo identification, and others are not.

He was unable to tell us how people can request this option.

We next contacted “Technical support with HMRC Online services” on 0300 200 3600.²¹

After a lengthy wait we were able to get through to a very helpful agent. We explained that we were calling from an organisation, to find out what mitigation was available to people who could not use the identity verification app on account of their name as recorded in their MRZ not matching the name as held by HMRC.

After a thorough discussion, the agent confirmed that if the name does not match *exactly* (meaning exactly matching first name, middle names, surname), then the app cannot be used, and the only course of action available to the individual is to contact the HMRC tax office to request that the HMRC name is adjusted to match the ID.

We explained that it is obviously not desirable (or even possible) for an individual to have their name adjusted on HMRC to deliberately truncate it, remove a first name, use an unhelpful diacritic transliteration, or to change it to their birth name when they are known throughout the UK (to employers etc) by their married name.

The caseworker suggested that we call the HMRC tax office on 0300 200 3300 because he said they would know how to deal with such discrepancies.

We therefore contacted “Income Tax: enquiries” on 0300 200 3300.²²

At our first attempt, we had to abort the call after over 50 minutes due to needing to be elsewhere. At our second attempt at a quieter time of day we got connected to, again, a very helpful agent.

Having explained the problem again, he understood the issue completely and was very sympathetic, and volunteered to speak to someone more senior and then call us back. When he did so, he apologised that the answer was not very helpful. He was only able to reiterate that, whatever appears on the passport must match the HMRC system - so in the example of the married name, if the identity verification app reads the birth name from the MRZ, then the HMRC records must be in the birth name.

We then asked whether, in such cases, there was a different way to set up an account, especially for someone who doesn't have a UK driving licence, existing tax records or a sufficient existing credit rating. He was not able to provide any information on a different way to set up an account.

Government inter-department APIs and how these do not solve the problem

We are aware that there are Application Programming Interface connections (APIs) between the Home Office and a variety of Government departments including DWP, Islington Council - Connect, Social Security Scotland,

²¹ <https://www.gov.uk/find-hmrc-contacts/technical-support-with-hmrc-online-services>

²² <https://www.gov.uk/find-hmrc-contacts/income-tax-enquiries>

the NHS, DVLA the Student Loans Company, and to carriers when travelling.²³ A GOV.UK media factsheet²⁴ states:

“Customers can access many UK government services and benefits without needing to present proof of immigration status. This is because selected government departments and authorities including the Department for Work and Pensions and the National Health Service in England and Wales, can securely access immigration status information automatically through system to system checks.”

The cohort described above who cannot create a Government Gateway account due to name mismatches, are usually also not helped by these system to system checks between Government departments.

Taking the example of a married woman who has lived in the UK for many years and is known only by her married name in various Government departments, but whose MRZ contains only her birth name (and hence her eVisa is in her birth name):

- Trying to renew her UK driving licence (in her married name) with DVLA is a problem because system to system checks will not match her name with her eVisa, and she will need to request the DVLA to consider a share code instead.
- Similarly, applying for benefits with DWP, applying for a student loan, or receiving NHS treatment will be a problem because the system to system checks will not match her name with her eVisa. In each case she will have to understand what the underlying problem is and convince the relevant state entity to accept alternative proof of status such as a share code, and to furthermore accept the name difference.
- Even if this person then updates their eVisa to have their name reflect the VIZ part of their passport, so that the surname says “BIRTHNAME EP DE MARRIEDNAME”, the system to system checks may not correctly interpret this to return a positive match.

Exactly the same type of problems happen with system to system checks where someone’s name is truncated, or names with accents are transliterated differently in the MRZ than is stored in in e.g. DVLA, NHS or DWP records, or where first name and surname are stored entirely in the MRZ surname field.

These problems ultimately all derive from the decision to treat the MRZ name in identity documents as the source of truth of an individual’s identity.

To solve this situation, it is necessary to have a thorough cross-governmental approach to identifying individuals in the digital-by-default world envisioned by the UK Government. A large variety of detailed use-cases must be worked through, to ensure that the system works for everyone and no-one is left behind.

Every individual who has the right to access UK Government services must be able to do so smoothly, regardless of Government department, regardless of the national travel document regulations of their country of origin.

²³ <https://www.gov.uk/government/publications/view-and-prove-your-immigration-status-evisa/your-immigration-status-an-introduction-for-eu-eea-and-swiss-citizens-accessible-version#where-we-provide-automatic-access-to-your-immigration-status> and <https://www.gov.uk/evisa/travel-with-evisa>

²⁴ <https://homeofficemedia.blog.gov.uk/2024/04/17/media-factsheet-evisas/>

Our questions

In 2022 we wrote to HMRC about the withdrawal of GOV.UK Verify from HMRC/DWP online. The correspondence is available on our website.²⁵

At this stage, a great many people were struggling since GOV.UK Verify had been withdrawn with little to no notice, leaving many people completely unable to access their online HMRC/DWP records despite having previously been able to do so. The reply we received from HMRC dated 28 June 2022 informed us of the intention to allow the use of an identifying verification app by the summer, although we only became aware of the option to use it in the Government Gateway application process in early 2023.

We would like to ask the following questions:

- Q1. Please confirm what (if any) mitigations are in place for those who encounter the issues identified in this letter (i.e. issues with accessing HMRC and DWP services) to ensure they can still access essential support and services.
- Q2. Were any impact assessments carried out when HMRC changed from the mechanism involving User ID/password/activation code sent through the post, to the use of HMRC's Identity Verification? If so, could we receive a copy of them?
- Q3. Were any impact assessments carried out for the development of the GOV.UK One Login identity checking app (GOV.UK ID Check)? If so, could we receive a copy of them?
- Q4. Would you agree to a meeting with the3million where we can discuss these issues in more detail? From our experience with Home Office meetings it would be most helpful if both policy staff members and technical staff members were able to attend such a meeting from the Government's side.

Yours sincerely,

Monique Hawkins

Head of Policy and Advocacy, the3million

²⁵ <https://the3million.org.uk/publication/2022081201>