By email:

Pat McFadden MP, Secretary of State for Work and Pensions
Stephen Timms MP, Minister of State for Social Security and Disability

CC:

Miranda Biddle, Chief Executive, Independent Monitoring Authority for the Citizens' Rights Agreements (IMA)

Ed Mackie, Deputy Director Cross-Cutting Service Operations (Visa, Status and Information Services), Home Office

18 November 2026

Dear Pat McFadden and Stephen Timms,

I am writing to you on behalf of the3million, a non-partisan grassroots organisation of EU citizens (by which we include EEA and Swiss citizens, and their non-EU family members) in the UK, formed after the 2016 EU referendum to protect the rights of people who have made the UK their home.

We are writing to express our concern over reports of repeated immigration status checks for some EU citizens with settled status under the EU Settlement Scheme who receive Universal Credit (UC). The personal accounts of these cases expose a systemic problem with the DWP-Home Office immigration status API. Where the Home Office and DWP each use different rules or technology to identify an individual, people are falling through the cracks of mismatched identities.

Examples where this happens include when someone is known to the DWP and the Home Office by different names, either because they changed their surname on marriage or by deed poll, and this name does not match the name recorded in the Machine Readable Zone (MRZ) of their identity document. While the DWP will have accepted this change of name into their systems, the Home Office will have recorded the MRZ name in its systems.

While we understand the challenges of such name mismatches for automated systems, the genuinely shocking issue is that there appears to be no manual intervention available to address the problem. The people we have spoken to have been burdened with bi-monthly automated checks over a period of several years, and despite their cases having been discussed in meetings between the Home Office and the DWP, the checks have not stopped.

We previously wrote to DWP[1] about the problems that ending in-person identity checks would cause for people who do not hold a UK passport. We then wrote a joint letter to DWP, DSIT and HMRC[2] about the exclusion of non-UK citizens in the design of the identity checking apps that UK

[1] April 2022 - Letter to HMRC and DWP about withdrawal of GOV.UK Verify from HMRC/DWP online services
[2] August 2025 - Letter to the Departments of Science, Innovation and Technology, DWP and HMRC about non-British citizens excluded from UK Government online services due to identify verification app design.

government departments use, such as 'GOV.UK ID Check' and the online service 'One Login'. DWP has not replied to either letter.

We kindly request a meeting with the technical department of DWP that handles UC beneficiaries to explore solutions for EU citizens and other non-UK citizens who may face incorrect welfare refusals and/or unnecessary immigration checks and administrative tasks due to the current naming practices.

The underlying problem and impacted cohorts:

For certain EU citizens and others who hold a UK immigration status, the way the technology captures a person's name can block them from proving their identity through the digital services of UK departments. The identity checking apps treat the name held in the MRZ of a passport as the single source of truth about who that person is. For several cohorts, the MRZ does not hold the name by which the person is known, and the individual has no means of changing it.

The International Civil Aviation Organisation (ICAO) accepts that the MRZ portion of a passport may not reflect someone's true name. The HM Passport Office[3] publishes detailed country notes on the different laws, standards and practices for displaying names. These notes show that certain nationalities, including for example French and Dutch, cannot amend the MRZ portion of their passport when someone changes their name through marriage. They also set truncation and transliteration standards for people whose names have too many characters or contain a letter with diacritics.

When the Home Office issues someone's eVisa, the name on the account comes from the MRZ portion of the identity document that the person supplied in their application. The MRZ portion of an identity document does not always reflect someone's true name. For example, the MRZ of a Dutch passport always contains the holder's birth name, even if the holder changes their name after marriage. Dutch law requires the MRZ to contain the birth name, so the visual portion of the document shows the married name instead, marked "EV" (echtgenoot van, meaning "spouse of"). The MRZ may contain only machine-readable characters, so if someone has an umlaut in their name, such as "ü", the issuing authority transliterates the letter under ICAO standards as either "ue", "uxx" or "u". Using the MRZ as a single source for someone's name can create a mismatch between how the person is known by other UK government departments and what their immigration records hold.

For EU citizens and other non-UK citizens who have lived in the UK for decades, since before Brexit and the introduction of digital services, the UK state, including DWP, would have known them by their chosen name. They may never have encountered any issues holding personal accounts in that name. The name mismatch may not have caused issues for people right away, but when a trigger event occurs, such as needing to apply for welfare support, Pension Credit, UC or NHS treatment, people face problems proving their identity, and crucially, their eligibility for that support.

[3] HM Passport Notes -https://www.gov.uk/government/publications/knowledge-base-caseworker-guidance

The systemic problem for people without a UK-issued document is that there appear to be discrepancies in how different UK government departments treat names. We are aware that data-sharing capabilities between the Home Office and DWP allow other UK government departments and local authorities to use someone's National Insurance number or document number to request that person's immigration status.[4]

Specific Cases[5]:

Case one: S, a French woman who changed her name after marriage, receives a request every two months to prove her immigration status.

DWP knows S by her married name since 2018. When S applied for status under the EU Settlement Scheme (EUSS), she was granted settled status, also known as Indefinite Leave to Remain, under her birth name - since that is the name that appears in the MRZ of her French passport, which in turn is the name read by the EUSS's identity verification app. S has been in receipt of UC since before she applied for settled status and under her birth name.

Since November 2024, S has received an automated message in her UC journal every two months asking her to prove her immigration status by providing her passport number. Her UC journal shows a To-Do titled 'Immigration Documents: we will check your immigration status'. To complete it, she must submit her passport number through the UC journal portal.

S has submitted her passport details more than 10 times since November 2024, but she has received no explanation of why the two-monthly checks continue. On 10 July 2025, the UC team told her in a message that it could not stop the request because it is 'system generated'. The UC portal explains that people need to provide immigration documents in the following circumstances:

"We do not have evidence of your current immigration status this could because

- You have your status, but not reported it
- We have not received an update from the Home Office about your status
- You have not received your biometric residence permit (BRP) or eVisa
- You have British citizenship or indefinite leave to remain"

Her current passport is correctly linked to her eVisa, but the eVisa account cannot display *just* her married name. According to Home Office standards, an eVisa must include the name held in the MRZ portion of the passport and can optionally show additional names as shown in the 'visual inspection zone' (VIZ) portion of the passport. S's only option is to ask the Home Office to change her eVisa to show her surname as "birthname ep. married name", which would match the VIZ of her passport but which would still not match the 'married name' by which the DWP knows her.

[4] 2026- Home Office Written evidence to "Harnessing the potential of new digital forms of identification"
[5] Personal details for cases can be shared if requested

S is currently undergoing cancer treatment and relies on UC to supplement her income. She reports that the regular requests cause her additional stress, and she is frightened that DWP will stop her support.

Case two: *Joint claimants J and I receive monthly requests to verify their immigration status, alternating between the couple. They both changed their names by deed poll, but neither can have their Polish passport reflect the change.*

J is in the early stages of vascular dementia, and his wife, I, is his primary carer. J is concerned that, as his condition worsens, the administrative task of proving his immigration status every month will become unmanageable.

Since their support switched to UC in November 2025, J and I have received more than ten monthly requests to verify their immigration status. Because they are on a joint UC claim, the automated system alternates each month between asking J and asking I to provide their immigration status. J and I have attended in-person sessions at the Jobcentre to verify their identity and to provide evidence of their name change by deed poll.

The process for providing immigration proof is the same as the process described above for S. On 6 August 2026, a caseworker told J and I through the UC journal:

"Unfortunately, this known error is still trying to be fixed. In the meantime you can ignore it and it will go away and not affect your Universal Credit claim. Again, we apologise for the trouble it is causing."

However, J and I are concerned that DWP could suspend their payments if they do not submit the monthly immigration documents.

Request for a meeting with DWP's technical team

the3million has previously raised the issues with digital access for people who do not have a UK issued identity document. We would appreciate an opportunity to meet with your technical team to explore potential possibilities for resolutions and assurances for those who continue to have to prove their immigration status.

Yours sincerely,

Kaelynn Narita

Research and Policy Manager, the3million