

The challenge

There are therefore many situations where the MRZ displays a variation of the VIZ name. As just a few examples:

- Birth name vs married name, for example
 - VIZ: PRIMARY IDENTIFIER: "BIRTH_SURNAME wife of/épouse de MARRIED_SURNAME"
 - MRZ: BIRTH_SURNAME
- Names with accents, especially when the ICAO document gives more than one valid recommended transliteration option, for example
 - VIZ: PRIMARY: "Weiß", SECONDARY: "Jürgen"
 - MRZ option 1: WEISS<<JURGEN<
 - MRZ option 2: WEISS<<JUERGEN<
 - MRZ option 3: WEISS<<JUXXRGEN<
- Names that are too long, and get truncated in the MRZ, for example
 - VIZ: PRIMARY: "De Vries-De Jong", SECONDARY "Alexander Benjamin Constantijn Diederik"
 - MRZ (in passport): "DE<VRIES<DE<JONG<<ALEXANDER<BENJAMIN<CO"
 - MRZ (in credit card-sized ID card): "DE<VRIES<DE<JONG<<ALEXANDER<BE"

Crucially, **in such cases it is not possible to read the MRZ name and deduce what someone's correct full name is** as displayed in the VIZ. As just one example - this is most obviously the case if truncation has occurred - it would be impossible to 'guess' what has been truncated.

In other cases, there are different international practices, including e.g. some Indian citizens have only one name, or some passports (e.g. from Singapore, India, China, Hong Kong) display only one name field in VIZ rather than splitting into surname / given names, or some passports where the order of names is different to the order used in UK passports.

Clearly, the aim of any digital immigration status must be that an individual's correct name is displayed - as displayed in the VIZ. It should be correctly displayed not only to the status holder, but also to those checking their status. This is also so that their name correctly reflects the name that the individual uses in other state departments, like HM Revenue and Customs, the Department for Work and Pensions and the National Health Service, and with private entities including banks, employers, landlords, and educational establishments.

At the same time, we recognise that automated systems are geared towards reading the MRZ, as the MRZ has been specifically designed with optical readers in mind.

The challenge is how to satisfy both these requirements, and our contention is that the Home Office has entirely failed to do so - despite specific requests from the3million to engage on the detail of this problem from early 2018.

We consider there are obvious solutions that do not appear to have been implemented. We are receiving many reports from people unable to set up their eVisa, unable to update their eVisa, and/or unable to effectively use their eVisa to access the rights they should be entitled to, all as a result of not dealing with the MRZ/VIZ issues.

the3million engagement with the Home Office on this issue

The3million attempted to engage the UK Home Office on questions around this challenge from a very early stage in the design of the EU Settlement Scheme (EUSS), through a document of “questions to the Home Office”⁷ which was revised 3 times between April 2018 and February 2019. The earliest version of these questions predated our knowledge that the EUSS would scan passports and use the MRZ, and our expertise and understanding around ICAO standards.

However, from the earliest version ([version 1.0 - 9 April 2018](#)⁸) we included the following questions:

- 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 has also had very long-running correspondence with the Home Office on the subject of particularly married women, who want their digital immigration status to display their married name (as shown in the VIZ) even though the MRZ only contains the maiden name.

See this correspondence chain⁹ (between August 2021 and February 2024) which includes:

- Our letter from 23 August 2021¹⁰ in which we write: *“We have asked the Home Office team responsible for View and Prove whether it is possible for the EUSS status to show other names alongside that as read from the MRZ. After all, the EUSS application process asks people what other names they are known by, it allows people to upload marriage certificates, and it asks for a photograph of the identity document (further to the MRZ-scan of the identity document).”*

The letter quoted the unequivocal position of the Home Office which essentially said the MRZ was the only name being considered, and if there was a problem, people should simply find a way to change their identity document. The UK considered this to be the problem of the other country’s passport issuing authorities. The embedded quote from the Home Office was (our emphasis):

⁷ <https://the3million.org.uk/publication/2019022701>

⁸ <https://the3million.org.uk/sites/default/files/documents/t3m-questions-HO-EUSS1.0-09Apr2018.pdf>

⁹ <https://the3million.org.uk/publication/2024021502>

¹⁰ <https://the3million.org.uk/sites/default/files/documents/t3m-letter-HO-DWP-EUSSBenefitsMailshot-23Aug2021-2.pdf>

*“at this time, our position remains 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. [...] I appreciate that the French authorities are not willing to amend [...] passport to reflect her married name in its MRZ. However, **I am unable to comment further on how the French authorities record an individual’s name in their passport as the documentation of their citizens is not within our remit.**”*

We continued in our letter to respond to this quote: *“It is not acceptable for the Home Office to refuse to engage with the legislation surrounding identity documents in the other 27 EU countries, or to say that this documentation “is not within our remit”, given that it was the UK Government’s decision to leave the EU, and to set up and design the EU Settlement Scheme to allow all affected citizens who have made the UK their home to retain their rights.*

the3million raised a series of questions to the Home Office in 2018, while the EUSS was being designed, and we raised this issue even in its earliest edition of April 2018.”

- The reply of 14 October 2021 was the first time the Home Office agreed to change their position. They wrote (our emphasis): **“EUSS status is issued in line with the name recorded in the machine readable zone (MRZ) of the applicant’s passport provided at the time of application.**

*The Home Office has recently built in a process which, after EUSS status has been issued, allows applicants to **request their name be changed on their status to exactly match the name which is recorded in the Visual Inspection Zone (VIZ) of their passport instead.** We are aware that for many French and Dutch married nationals, this will take the form of “Birth Name Wife of Married Name”. This would enable applicants to have their married name displayed on their status whilst maintaining a link between the two names for security purposes.”*

- The further correspondence - stretching all the way to February 2024 is about how the process for people to request this change is unacceptable, requiring people to send their passports through the post, just to get their name to be displayed as displayed in the VIZ. The most recent reply, of 15 February 2024, says: *“As per the response of 18 November 2022, there is currently an interim solution in place. However, significant progress has been made towards delivering the strategic solution, which we will endeavour to have in place by the end of this year.”* In recent meetings, this updated functionality was promised by the end of February 2025.

However, this response also contains a further commitment to MRZ-centric thinking when asking about VIZ names being displayed on UKVI accounts: *“As a matter of policy, we do not allow text other than LATIN characters, without diacritical comments other than hyphens and apostrophes. We use the International Civil Aviation Organization (ICAO) standards to transliterate non-Latin characters into Latin ones. This follows the approach used for UK Passports.”*

More recently, the3million has raised this issue with the Digital Status Services Stakeholder (D3SF) forum, both via emails and in meetings. We have requested more detailed meetings dedicated to this subject.

Potential solutions

It seems very clear to us that:

- Any digital status must display an individual's correct name;
- any system dealing with reading identity documents must store **BOTH** MRZ and VIZ as database fields within their system; and
- caseworkers must be fully trained in understanding ICAO standards, as well as varying international practices around names in identity documents.

Proposed high-level description of functionality when identity document is first scanned (on immigration application, or on eVisa creation):

- Read and store the MRZ against the UKVI account
- Read and store the name(s) in VIZ against the UKVI account
- Display the VIZ name in the UKVI account (properly formatted as per VIZ, complete with diacritics, spouse of names, split into surname and given name if identity document shows those etc)

Proposed high-level description of functionality when wanting to link a new identity document:

- Read the MRZ of the new identity document
- Read the VIZ of the new identity document
- Apply the following logic:
 - if both **MRZ(new) = any MRZ(stored)** and **VIZ(new) = VIZ(stored)** - allow update
 - if **MRZ(new) = any MRZ(stored)** but **VIZ(new) <> VIZ(stored)** (*this would arise for example when someone gets married but MRZ stays in BIRTH NAME and VIZ adds "spouse of" line*)
 - Do a manual check and approve if change is acceptable
 - Store VIZ (new)
 - Display VIZ (new) in the UKVI account
 - if **MRZ(new) <> any MRZ(stored)** but **VIZ(new)=VIZ(stored)** (*this would arise e.g. if someone added a National Identity document to their UKVI account which previously had a passport, and different level of truncation had occurred due to different line lengths*):
 - Do a manual check and approve if change is acceptable
 - Store MRZ (new) alongside previous MRZ
 - Continue to display VIZ (old or new) in the UKVI account

Examples of reports we have received

Example 1. Transliteration of accents in name

“Our client is a senior executive of an overseas listed company. He has been granted leave under the GBM route. He is unable to add his passport to his UKVI account due to a technical issue. His surname in his passport contains a “ü” (U with 2 dots on it). In his UKVI account and BRP this letter appears as a “u” (without dots).

In November, our client submitted an online request to the Home Office to add his passport as a new document to his UKVI account. The UKVI responded to his request 3 weeks later stating that they could not approve his request because his name on the passport is different to that in his UKVI account, and the request was closed.

In December, our client called the Home Office to resolve the issue and was told to post his passport to the Home Office for verification and his account will be updated. Our client travels every week and cannot be without his passport. Sending it off will impact him and the business significantly. The client has umlauts in the surname; however, they appear as ‘xx’ within his name in the MRZ, as opposed to two dots on the u, when the passport is scanned to create their evisa account.

In January he tried again, taking a photo of his passport as requested. However, two weeks later he received another rejection of the request, stating *“You recently requested to add a new identity document to your UK Visas and Immigration account.”*

We could not approve your update request because your name on your new identity document is different to what is on your account. If your name has changed, you need to update your personal details first. We have now closed your request.”

THE3MILLION NOTE: uxx is a valid transliteration of ü as per ICAO. The individual would clearly not wish to have his eVisa name displayed as containing UXX.

Example 2. Truncated name

“I have had EUSS Settled Status for several years. I have 4 middle names hence my full name takes more than 39 characters. I recently renewed my French passport, and submitted the update request on the UKVI website on 10Dec. I received a reply on 31Dec that the update request was rejected because “We could not approve your update request because your name on your new passport is different to what is on your account.” However that is not true! The name on my passport precisely matches the name on the account (I haven't changed my name since the last passport so that's still the case). What doesn't match is the shortened name in the middle of the MRZ, but obviously the name on the passport is shown under the “Surname” and “Given name” fields and this is what should be used, not some parts in the middle of a cryptic sequence of characters without well identified fields (ie the MRZ). I called the Resolution Center on 31Dec, the estimated wait time was too long (1h40 mins) so I tried again on 2Jan. I waited more than 1h to speak with someone, as I need to get that updated. He explained to me that the MRZ was likely causing the issue and told me he would raise the request internally with a note to check the name on the passport scan. I called again today 13Jan to check on the progress. The adviser told me that he was not seeing any request in progress. He advised me to say that my details have changed, even though they haven't, and to send my passport by post. I pointed out that this is quite strange as they have exactly the same

information in the passport scan I provided. I asked for how long they would keep the passport but he did not want to provide a possible timeline. I travel regularly, both in the EU and outside the EU, and both for work as well as personally (with a family of 4, so if we have to cancel, costs are quite substantial, not to mention the lost opportunity as we can't take holidays whenever we want). I don't understand why it took 21 days to reject the request if that was processed automatically. If that was processed manually, then how come it wasn't approved? Sadly the Resolution Center advisers are not able to access the passport scan hence they cannot check the name match themselves. It's now been more than 1 month that I'm trying to update the passport with no clear solution. It was supposed to be simple but it's a bit disappointing that a rather basic consideration like names shortened in the MRZ was overlooked."

Example 3. Truncated name

"I have tried updating my passport due to the passport being renewed. They said that the name don't match. My name hasn't changed. But the MRZ leaves off one final letter from my last given name - because my given names and surname are one character too long. The "update" took 1 month (instead of 2 weeks, which is already ludicrous). The agent acknowledged that this is a mistake as the names do match. They have raised a ticket with people that are totally unaccountable to progress as there is no way to contact them and there is no timeframe to expect an answer. To the question "What am I supposed to do when I travel to come back into the country", the answer was "We cannot give travel advice here".

The passport update was raised on the 2nd of January as soon as I got my new passport (uploaded online all per standards). The email about the issue was only sent on 30th of January, almost a month after submitting the update which is a ludicrous amount of time. I immediately got on the phone and got a ticket raised (which was painful as the IVR is designed so nobody can get through) and it is the 14th of February with no answer and no timeline to when it will be resolved.

Example 4. Truncated name

"It took 20 attempts on separate occasions to scan my BRP in the UK ID check app. It then has scanned only half of my name, despite me typing in my full name. There is no way to edit this so have had to submit my application with half of my middle name missing. I am currently outside of the UK and meant to be returning just after my BRP card finishes. I am very stressed as I now currently have no proof of my status and can't book my flight or return until I do. I am now separated from my wife despite holding a UK visa!"

Example 5. Truncated name

"I started my EVisa registration but I am unable to progress further due to my name mismatch.

The name on the front of my BRP card is correctly spelt as [NAME1] [NAME2] [NAME3] while the details at the back of my card is spelt as [NAME1] [NAME2] [NAME3], but omitting the final letter of [NAME3].

Due to this, I have been unable to progress with my registration as my given name is different from the scanned details on my BRP card. I am worried that I have to get it done before the year runs out. I called the UKVI customer service line and I was told to send a mail but I am yet to receive a response. I don't know if I should register with the name on my BRP and apply for a correction after my EVisa has been registered."

Example 6. Only one name on Vietnamese passport

“The name shown on my wife’s passport is “[NAME1] [NAME2] [NAME3] [NAME4]”.

This is all on one line under the heading "Full Name" because, in practice Vietnamese passports do not have different lines for "surname" and "first name(s)".

On her UKVI account, on the page titled "personal details" her name appears exactly the same “[NAME1] [NAME2] [NAME3] [NAME4]”.

The only explanation (possibly) is that on her passport the words [NAME1] and [NAME2] have diacritical marks because they are written in Vietnamese language . I can't express them on my keyboard but they are an upside down circumflex above the "A" in [NAME1] and a dot beneath it ; and similar for [NAME2] (dot beneath the i). They denote accents just like the French circonflexe and aigu etc .

If this is the explanation then it is just craziness because there is no way I can fix it ! If its something else I have no idea what.”

Further update:

“I thought I would let you know that I phoned the Home Office help line yesterday and after an hour (and 174 ahead of me in the queue) the person I spoke to said that the reason for the "names not matching " and the rejection of my attempt to add my wife’s passport to her UKVI account was as follows:

<NAME1<NAME2<NAME3<NAME4 = how her name appears in the MRZ section of her BRP (used to create her UKVI account)

<NAME1<<NAME2<NAME3<NAME4 = how her name appears in the MRZ of her passport .

Spot the difference ? Two chevrons between NAME1 and NAME2 in the passport and only one in the BRP.

Utterly absurd and i am now having to send her passport to Liverpool - for manual update - with attendant risk of postal / other loss (not just the passport itself but the 5 year Schengen / other visas it contains)”

THE3MILLION NOTE: The double chevron is the delineation of surname and given names. This is correct in the passport, but the UK-issued BRP was clearly issued incorrectly in the past because the caseworker probably took the entire “name” from the previous identity document and entered it into the Home Office systems as either all surname, or all given name. They could / should have understood from the MRZ that NAME1 was to be considered surname, and NAME2 NAME3 NAME4 the given names.

Example 7. Only one name on passport

“My clients are Indian and only have one name, no surname. They have started creating the online account but the app does not scan their BRP correctly, as it does not recognise the machine readable zone.

They have been advised to create their online account entering their name on both name and surname fields but this does not correct the issue when using the app. I, as rep, have been in touch

with a Home Office senior contact to find a solution. They are looking into it but what they have suggested has not worked.”

Example 8. Only one name on passport

“I was trying to enter the evisa details of my husband, his first name and surname is in the first name space in passport, hence I entered both names in surname , I tried to scan the brp, after the I'd check when I submitted it says wrong details, could you please help me”

Example 9. Married name v birth name

“I am really concerned that the Home Office gave me my Settled Status using my maiden name rather than my married name, in spite of the fact that I made the application using my married name as it is the one I actively use in my everyday life in the UK (bank account, NHS registration, HMRC etc.). My passport shows both names but the Home Office only takes the first name, which happens to be my maiden name on my passport. I'm worried it could be a problem when I have to prove my identity.”

Example 10. Married name v birth name - more complex example

This person is French, and married. The MRZ contains her surname as [BIRTH_SURNAME]. The VIZ displays “[BIRTH_SURNAME] ép [MARRIED_SURNAME]”.

When she first obtained status under the EU Settlement Scheme, the status was issued in her married name. This was unusual - if she had applied using the “EU Exit: ID Document Check” app, it would have been issued in her birth surname (because the App will always issue in the name found in the MRZ).

However, they had not used the App to apply, but had sent in their passport to the Home Office. Since she is known by her married name, she would have stated that in her EUSS application process, but including her birth surname in the appropriate questions of whether she'd been known by other names.

“I have settled status under the EU settlement scheme. When logged onto the Home Office website I see my married surname. I click on “add a new identity document”, then upload my new passport. I then get a screen which shows the number of my new passport together with my maiden name. It also states my surname which is also shown as my maiden name. I mistakenly added “ép [MARRIED_SURNAME]” to this, which has been rejected. Should I have left it in my maiden name or changed it to [MARRIED_SURNAME]? As you can see my name is recorded as [MARRIED_SURNAME] and I think this is what I should have used, the Home Office has already seen my old passport when awarding the settled status. I will be going to France in May and I am concerned that I may have difficulty returning to the UK if my new passport is not added to my records.”

We asked the Home Office what this person should do - since it seems like she faces a problem either way.

There are only three things she can do when within the ‘add a new identity document’ process and facing the screen which has just read her passport / MRZ. It appears all of these 3 options will likely lead to a rejection and insist on her posting in her passport:

- If she accepts the MRZ-read name of [BIRTH_SURNAME], then the system will see a change between EUSS name of [MARRIED_SURNAME] to [BIRTH_SURNAME]
- If she overrides the MRZ-read name and enters [MARRIED_SURNAME], then the system will see a change between MRZ name of [BIRTH_SURNAME] to [MARRIED_SURNAME]
- If she overrides the MRZ-read name and enters “[BIRTH_SURNAME] ép [MARRIED_SURNAME]”, the system rejects it also (this has already happened).

It seems extraordinary that:

- These changes are clearly looked at by someone (or some system) because the update request takes around two weeks or more before it is rejected;
- During this manual process, no-one appears to be able to take a more sensible approach and accept the passport update - given NOTHING has actually changed between previous passport and new passport; and
- When I requested advice from the Home Office, there was no available advice, rather it required escalation. It seems there is no standard way of solving this problem.