Introduction: The Conservative Science and Technology Forum was set up in 1977 by Sir Keith Joseph. Its principal aim then, as now, is to bring together Conservative-minded technical and scientific people to assist the Party in policy making and the role of science and technology within that function.

The CSTF Digital ID Working Group, co-Chaired by Lord Holmes of Richmond and Andrew Henderson met on the 9th of June 2021 and heard from industry experts and practitioners about how right to work checks run at present, the problems that the proposed process as of June 21st will cause both UK employers and potential employees and how digital systems would benefit everyone. The meeting also referred to work done by the APPG on Digital ID on this topic[1]. **One of the principal issues is that the reversion to paper based documents gets in the way of legitimate job applications by UK nationals while doing little or nothing to reduce the risk of employment fraud. Its only virtue is that in enables officials and organisations to say they have complied with a meaningless set of regulations.**

Evidence was submitted in particular by Keith Rosser who is a Director of Reed Recruitment, a privately family-owned UK firm and Andrew Henderson, a technologist and Co-Chair of this Group who has studied this topic extensively. The purpose of this brief is to present the case for the use of digital systems in improving the speed, efficiency and security of right to work checks. This will have four positive effects on the economy:

- It will enable people to get back into work more quickly and therefore help business recover and build back better
- It will enable people in employment blackspots to find jobs elsewhere therefore accelerating the levelling up agenda
- It will enable hybrid working, now a common method in the UK labour market
- It will cut the risk of fraud in a system that is open to it.

All of these points will help the Conservative Government to build back better and improve the lives of millions of people. It will also create fairness in a system where, under current proposals, non-UK nationals will continue to gain employment using online, remote methods but UK nationals will be limited to attending in person, or posting their documents to an employer, restricting the opportunities available to them and making it more expensive and time consuming for employers to hire UK nationals.

Key policy points:
1. **The Conservative Government should immediately extend the temporary use of online right to work checks whilst it consults with HR, recruitment and technology professionals on a permanent digital ID scheme.**
2. **The Conservative Government must give parity to the use of online digital ID checking and verification services alongside paper / face to face systems that it has mandated to date.**

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[1] Digital identities APPG – Exploring the impact of digital identity on the UK economy (wordpress.com)

3. **The Conservative Government should continue the modernisation of right to work checks announced in December 2018 (https://www.ein.org.uk/news/home-office-announces-changes-modernise-right-work-checks) to ensure digital ID schemes can be used permanently from mid-2022 onwards in place of paper-based and face-to-face checks.**

Background

Covid has forever changed the labour market for good. Trends in the way that we work have accelerated so that numbers home working or in the gig economy etc. are increasing. Hybrid working and business models are here to stay. There is no going back. The structures that underpinned the world of recruitment and hiring have also changed due to Covid.

In 2020 the Home Office temporarily announced that face to face / paper document based right to work checks could be done digitally. In March 2021 the Home Office announced a return to the status quo ante with very little notice. It was changed following pressure from business to June 21st. This is just as challenging for business and work seekers as lockdown restrictions have been extended and many employees continue to work remotely by default. The CSTF heard evidence that 0.5m people were recruited through that method, who would have struggled to find work otherwise during the pandemic, and there were no security issues or challenges around illegal working. In fact, it was widely agreed that physical, face to face checks are not secure as front line staff are not well enough equipped to identify fake documents, fraudulently obtained genuine documents, or even to fully understand right to work status for overseas nationals.

The CSTF is therefore asking for the current planned hiring system to change to enable us to succeed and build back better. The old ways of working will not serve our new ways of working and slow down the process too much.

What are the issues?

The meeting identified the following issues with the current system:
1. Cost - Additional cost of hiring thanks to Home Office red tape.
2. Crime - Fraud and criminal activity built into the process by the process itself.
3. Delay - Deliberately slowing down the hiring process due to red tape.
4. Lack of Parity – Non-UK nationals can apply and gain work remotely, whereas UK nationals will not be able to.

Cost

The process introduces a number of costs into the system which the Working Group believes are unnecessary and can be removed through a modern, digital one.

1) The mandatory face to face process adds cost into the system in a number of ways. It forces applicants to travel to an office to show an ID document. As more UK citizens now expect to work remotely this forces work seekers to travel with their identity document or send their document via the postal system, even where their role may be 100%

remote based. Additionally, for the economically disadvantaged, many of whom live in areas of high unemployment, they may not be able to afford to travel. This inhibits people seeking employment outside their local area.

2) As many businesses have moved to home-based or hybrid working systems, the need to meet face to face has people coming into the office for no other reason than a document check. Many organisations have reduced their office footprint meaning they may no longer have satellite or local offices. Organisations are increasingly digital, and may no longer even have a physical office, so document checks will have to be performed in a public place such as a bar or café – and in some cases existing staff travelling significant distances to meet a prospective employee

Crime

The requirement to present identity documents such as a passport and a driver's licence to prove who you are is open to fraud in three ways:

1) People can produce fake ID documents and the staff who read them are not trained nor do they necessarily have the equipment to test the document presented to them. One website[2] offers UK biometric residence permits for US$950. Another website, with a London contact address, also offers both real and fake documents[3]. The Metropolitan Police offer useful advice on Identity document validation technologies[4]. From the evidence given at the meeting it was apparent that these technologies are little known and not well used by hirers. The process effectively generates a "theatre of identity[5]" whereby people look at an ID document but do not know what it is meant to look like. For overseas documents, it is very difficult to know for certain whether or not it is genuine. The reason these technologies have not been adopted is the insistence of the Home Office for employers to conduct physical checks, this has required investment from organisations thereby limiting investment in technologies due to cost and due to the need to have to meet people in person anyway.

2) Documents can be sent in for checking by post. This produces a huge risk of theft in transit. Under the previous system some 400,000 UK passports go missing every year[6],the proposed Home Office process will likely lead to an increase in this number as more documents are sent by work seekers around the UK, which at the same time increases the risk of criminal activity with this process.

3) The process asks HR people to build up a honeypot of photocopies of passports, driver's licences etc. which they need to prove that they did the check in the first place. There are clearly 1000s of these copies in

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[2] Buy registered UK residence card online, Buy Fake UK Residence permit card, Buy UK fake Residence card, British Fake temporary residence permit, Buy Fake PR card of United Kingdom, Buy UK original residence card online. (buyrealfakepassport.cc)
[3] Resident Permits - COUNTERFEITI
[4] Identification Document Validation Technology - GOV.UK (www.gov.uk)
[5] Welcome | David G.W. Birch (dgwbirch.com)
[6] 400,000 UK passports go missing every year with many being sold | Daily Mail Online

offices around the country or being transported from public places where physical checks are being conducted away from offices

Delay

As with any process the speed of undertaking it can be a help or a hindrance. For reasons outlined in our "Cost" section the need for face to face introduces an artificial break into the hiring process. One UK Bank commented: "In just the last 5 weeks we have hired circa 150 people into entry level roles in employment hotspots of NE England and South Wales. We plan to continue in this vein through the next 6 months but will be severely limited by the changes and will have to narrow where we hire."

A number of correspondents estimated that the face-to-face process adds 75% more in time terms than the temporary digital one.

Moreover, it is quicker to hire a non-UK worker. Non-UK nationals are able to evidence themselves via the online checking service rather than the face-to-face process. A UK national does not have the same opportunity. As a consequence, it will be faster, quicker and easier for employers to hire non-UK nationals from 21st June when face to face checks return.

Parity

The process as proposed by the Home Office from June 21st allows non-UK nationals to perform their checks online. This is because the Home Office have set up the Online Checking Service[7] which allows a prospective employer to perform an online check on non-EEA nationals who hold biometric residence permits or biometric residence cards and EEA nationals who have been granted settled status under the EU Settlement Scheme.

What does digital offer?

Digital ID offers a faster, quicker and more secure method of identifying people. The Government have adopted digital for instance with NHS Trust ID and online testing for visa checks through the Home Office's Online Checking Service (https://www.gov.uk/government/news/online-right-to-work-checks). This demonstrates that the Government can do digital if it wants to.

Passports exist in a standardised world governed by ICAO[8]. Similarly there are standards for Digital ID generated here in the UK: PAS 499[9] from the BSI and Good Practice Guides 44[10] and 45[11] from HMG. There are UK companies building digital ID systems that are used by the UK Government in other areas which could be simply re-purposed for right to work checks. These systems are more secure than face to face checks, will speed up the process and reduce the cost. Digital ID will remove the issues raised above.

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[7] https://www.gov.uk/government/news/online-right-to-work-checks
[8] ePassport Basics (icao.int)
[9] PAS 499 Code of practice for digital identification and authentication (bsigroup.com)
[10] Using authenticators to protect an online service - GOV.UK (www.gov.uk)
[11] How to prove and verify someone's identity - GOV.UK (www.gov.uk)

What are the asks?

❑ The Home Office should recognise that technology has reached a state whereby parity between digital and face to face would allow choice with an improvement in security, speed and lower costs. We are not saying digital only, we are asking for both to run side by side. This is essential in helping the UK compete internationally.

❑ We want a non-discriminatory job market that does not make it harder for British workers to get into jobs.

❑ We want the Home Office to recognise that remote hiring has been proven to work well over the past 15 months. Moreover, a return to physical checking will limit job opportunities, hybrid job opportunities and will create an unequal jobs market. It will drive up document theft and will reduce the ability to identify illegal working. The idea that seeing an original document makes us better at identifying an illegal document is nonsense. It will add in extra cost, time and friction.

CONCLUSION

In sum it is about getting people back to work more quickly and therefore getting the economy moving again. The UK will not build back better until it has reformed right to work checks and brought the process up to date.

Key policy points:
1. **The Conservative Government should immediately extend the temporary use of online right to work checks whilst it consults with HR, recruitment and technology professionals on a permanent digital ID scheme.**
2. **The Conservative Government must give parity to the use of online digital ID checking and verification services alongside paper / face to face systems that it has mandated to date.**
3. **The Conservative Government should continue the modernisation of right to work checks announced in December 2018 (https://www.ein.org.uk/news/home-office-announces-changes-modernise-right-work-checks) to ensure digital ID schemes can be used permanently from mid-2022 onwards in place of paper-based and face-to-face checks.**

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