



Ap GIG
Cymru
NHS
Wales App



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GP Practice Guidance Identity Verification for the Welsh Identity Verification Service

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1. Introduction

Digital Patient Services are provided as a way of accessing NHS services. All health information relating to patients is confidential, and the NHS and its staff owe a duty of confidence to the patient. In addition, the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 places a legal obligation on those processing patient information to ensure data is accessed lawfully and securely. It is important both legally and ethically to verify the identity of the patient before giving access to Digital Patient Services, such as the NHS Wales App, to ensure that the information is only accessible by the correct individuals.

This guidance has been produced to assist General Practice in understanding the relevant considerations when verifying a patient's identity in order for them to access Digital Patient Services.

A Glossary of Terms not otherwise defined in this guidance is provided in Annex C for convenience.

2. Identity checks to use the NHS Wales App

Identification checks may be needed for a number of services in the NHS. This document can be used as a guide as to how identity can be verified using NHS login.

NHS login provides two-factor authentication when first used on a device, with an option of enabling biometric authentication for subsequent logins.

We recognise that every GP practice operates differently, with varying team sizes, capacity, and ways of working. It is therefore up to each practice to decide the most suitable way to support patients through the WIVS process. This could involve booking an appointment to complete the full WIVS journey in practice, or allowing patients to collect a verification letter and complete the final steps themselves at home using the NHS Wales App. To support practices, a suggested process flowchart is provided in **Annex D**.

3. Verification of Identity

NHS login provides a service whereby a patient can prove their identity using the online service. In some circumstances however, a patient may not be able to use this facility because they do not have documentary evidence required by the NHS login service, or they cannot use the service for some other reason, such as having a disability that limits their ability to use the service. On some occasions, individuals may not have the technical knowledge or confidence to complete the process or may not wish to upload their documentation. In these, and other circumstances that may present themselves, the Welsh Identity Verification Service enables a patient to be verified in person, in the same way that users were provided with access to My Health Online. This can take place at the practice, or where the patient cannot attend a practice for a reason, such as because of their health or a disability, the practice may facilitate this in another way, such as during a scheduled home visit by a doctor or nurse.

It is important that a person's identity is verified to ensure that the correct individual is accessing patient information. The Welsh Government have issued [The NHS Wales digital health identity standard for primary care \(NHS login\)](#) to set out how this can be



achieved in a way that ensures that patients identities are verified to access the full range of services. Three options are provided in the standard. These are:

There are two ways in which a patient's identity can be verified by the practice for the purpose of using the full range of services accessed by NHS login. These are:

- Proof of identification by presenting documentary evidence of their identity
- Face to face vouching

In both circumstances the patient must prove their identity in person.

3.1 Proof of identity of the patient by presenting documentary evidence

In order to verify a person's identity by presenting documentary evidence the practice should require:

- Two forms of documentary evidence as set out in Annex A to this guidance, one of which should be a photo ID.
- The patient must be able to answer one or more questions relating to information contained in their health records that confirm to the practice that the person presenting the evidence is the same person claiming the identity.

When examining identity documents, it is important to ensure that the document appears to be genuine. Copies of documents should not be accepted as proof of identification as these can be more easily altered. A visual comparison between the patient and their photo ID should be made to verify their identity.

Annex B contains an application form and associated file note that can be completed and uploaded onto the GP system to evidence the steps undertaken to verify the patient's identity.

Due to legal considerations in relation to certain documents, we would advise that practices do not retain copies of identity documents.

3.2 Face to Face Vouching

Face-to-face vouching can be used as an alternative method if the patient does not possess any form of acceptable ID listed in Annex A.

Face-to-face vouching should not be confused with other forms of identity verification such as countersigning passport or driving licence applications as the person verifying the patient identity must be a health professional who is authorised to access the healthcare record and can link the patient to that record.

This is usually more straightforward where there is an ongoing relationship between the patient and the healthcare professional treating them such as the practice nurse or a GP at the practice that is treating a patient. Where the link is less established however, vouching can be supported by any documentary evidence that a clinician working at the practice deems appropriate in their professional judgement, together with a series of questions relating to their health that can link the patient with the record. As a guide, any documentary evidence as contained in Annex A should be considered as appropriate documentary evidence.



Where identity documents are relied upon to part prove an individual's identity, it is important to ensure that the document appears to be genuine. Copies of documents should not be accepted as proof of identification as these can be more easily altered. Where photographic evidence is used, a visual comparison between the patient and their photo ID should be made to verify their identity.

Annex B contains an application form and associated file note that can be completed and uploaded onto the GP system to evidence the steps undertaken to verify the patient's identity.

Due to legal considerations in relation to certain documents, we would advise that practices do not retain copies of identity documents.

4. Auditing identity verification

In utilising the application form and file note contained in Annex B, this provides the practice with a mechanism to audit identity verification. In particular, this provides information on:

- The person who has verified the individual's identity, and
- The way in which identity was verified, and
- Documentary evidence provided to verify the patient's identity.

5. Clinical authorisation

While this guidance specifically relates to the process of verifying someone's identity. It is recognised that the process of verification may be undertaken at the same time as certain services are made available to the patient. Where access is to be given to any part of the health record, a process of clinical authorisation must take place. Records should not be made available in circumstances including:

- Where the clinician is of the reasonable opinion that making this information available will cause harm to the physical or mental health of the patient or any other person.
- The information contains reference to a third party, and it would not be in the reasonable expectations of that third party that this information be disclosed to the patient.
- The patient lacks physical or mental capacity to use online services themselves.
- A patient has been coerced into requesting access to their records, or the patient is at risk of being vulnerable to unwillingly share records.

This is not an exhaustive list of circumstances in which online record access should be withheld, and clinicians are advised to follow their own professional guidance.

The Royal College of GPs has produced a [GP Online Services Toolkit](#) that may also assist practitioners.

6. Managing Access: Administrative requirements

To support access to online services, a clear management process should be in place to determine how:



- The practice deals with managing patients who request online access to their health records.
- Incidents of reported unauthorised access to records are managed.
- The practice should deal with any suspected or confirmed safeguarding issues.

There should be a senior leader in charge of the overall process, this would usually be the Caldicott Guardian who can designate a number of responsibilities in the process such as:

- Verifying identity documents.
- Authorising any access.
- Managing Incidents of suspected or unauthorised access.
- Dealing with any suspected or confirmed safeguarding issues.

The practice should consider using an application form to record the patients request for access to NHS login. A template form is contained in Annex A. A template form is available in Word format and can be customised to suit your practice's needs, located in the GP practice toolkit (GP practice toolkit - Digital Health and Care Wales) The form can be personalised to suit the practices requirements.

The person investigating any incident relating to authorising access based on identity verification should be a different person from the person who has verified access to the system.

7. Further Guidance

Further guidance for online services is available in the [GP practice toolkit - Digital Health and Care Wales](#)

See also [The NHS Wales digital health identity standard for primary care \(NHS login\)](#) for detail on the standard being adhered to as part of this process.



Annex A: Verifying someone's identity by documentary evidence

When verifying someone's identity, it is essential that the person has a face-to-face meeting to ensure there is a clear link between the identification received, the person and their health record. This will usually take place at the practice but can where required in the circumstances happen at another location such as the patient's home during a home visit, although it may be necessary for another member of practice staff at the practice to verify details on the clinical system. Details of the type of identification accepted as identification should be noted on the appropriate section of the form in Annex B of this guidance

There are specific rules on copying some documents, therefore it is recommended that it is just noted what documents have been seen. The relevant form can be uploaded to the practice system instead of the identification documents.

The list below consists of examples of the types of evidence that should be viewed as accepted by UK Government.

Identification by Documentation

The standard requires at least one photo identification document should be provided as part of the identity process. Patients will need to provide:

- *Two pieces of evidence with a score of 3 or 4; or*
- *One piece evidence with a score of 2 and one piece of evidence with a score of 3 or 4*

Accepted evidence as contained in the standard issued by Welsh Government is detailed in the table on the next page.

Identification by Vouching

The person undertaking face-to-face vouching should be a health professional who is authorised to access the healthcare record and can link the patient to that record.

In cases where the relationship is less established, a clinician may accept such evidence as they deem necessary to ensure they have sufficient certainty to vouch for the patient.

Further information on identification by face-to-face vouching is contained in paragraph 3.2 of the guidance.



Score of 2	Score of 3	Score of 4
A Home Office travel document: <ul style="list-style-type: none"> • convention travel document • stateless person's document • one-way document • certificate of travel 	Passports that meet the International Civil Aviation Organisation (ICAO) specifications for machine-readable travel documents , such as a South African passport	Biometric passports that meet the ICAO specifications for e-passports , such as a UK passport
Other official government or local authority issued travel cards as issued in the UK (for example, a Freedom Pass)	Identity cards from an EU or European Economic Area (EEA) country that follow the Council Regulation (EC) No 2252/2004 standards	Identity cards from an EU or EEA country that follow the Council Regulation (EC) No 2252/2004 standards and contain biometric information
A marriage or civil partnership certificate	UK photocard driving licences	A UK biometric residence permit
60 and Over Welsh Concessionary Travel Card	EU or EEA driving licences that follow the European Directive 2006/126/EC	
Disabled Person's Welsh Concessionary Travel Card	UK electoral identification document (for example, a Voter Authority Certificate)	
A firearms certificate	A US passport card	
An education certificate from a regulated and recognised educational institution (such as an NVQ, SQA, GCSE, A level or degree certificate)	A bank, building society or credit union current account (which the claimed identity can show by giving you a bank card)	
A birth or adoption certificate	A student loan account	
A Blue Badge	A credit account	
A ' substantial ' electronic identity ' from a notified eIDAS scheme	A mortgage account (including buy to let mortgage accounts)	
A proof of age card recognised under the Proof of Age Standards Scheme (PASS)	A digital tachograph driver smart card	
A gas or electric credit account	An armed forces identity card	
A rental or purchase agreement for a residential property	A proof of age card recognised under PASS with a unique reference number	
	A loan account (including hire purchase accounts)	
	A ' high ' electronic identity ' from a notified eIDAS scheme	



Annex B: Identity Verification Application Form

PART A: Patient Details and Agreement

1. Details of the patient

First name			
Last name			
Address			
	Postcode		
Email Address			
Date of Birth		NHS Number	
Home Number		Mobile number	

2. Agreement

In making this application to have access to NHS Wales services by verifying my identity at my GP practice, I agree that:

- i. I wish to have access to online digital services.
- ii. I understand that I will be bound by the NHS login Terms and Conditions that I signed up to when creating my account with NHS login.
- iii. I will be responsible for the security of any information that I see or download.
- iv. If I choose to share any information with anyone else, this will be at my own risk.
- v. I will contact the practice as soon as possible if I suspect that my information has been accessed without my agreement.
- vi. I will contact the practice as soon as possible if I believe any information contained in my record relates to another person, is inaccurate, or is incomplete.
- vii. I will notify the practice if I think another person may put me under pressure to access online services accessed by NHS login.

3. Signature of applicant

Signature		Date	
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Information for the patient: You can report any concerns, and/or can request that your practice remove your online access to specific online GP services by contacting the practice during opening hours.



PART B: For Practice Use Only

i. Type of Verification

Please indicate the type of verification used to identify the patient.

- Verification by documentary evidence ☐
- Verification by vouching with reference to the health record ☐
- Verification by vouching with reference to the health record and
documentary evidence of identity ☐

Where the patient's identity is verified outside of the practice, please detail how the patient's identity has been verified with reference to information contained in the health record of the individual.

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ii. Details of identity documents provided:

No.	Document	Level
1.		
2.		

iii. Verification of identity

Patient identity confirmed		Yes <input type="checkbox"/>	No <input type="checkbox"/>
Name			
Position			
Professional Body*		Registration Number	

**Where applicable*

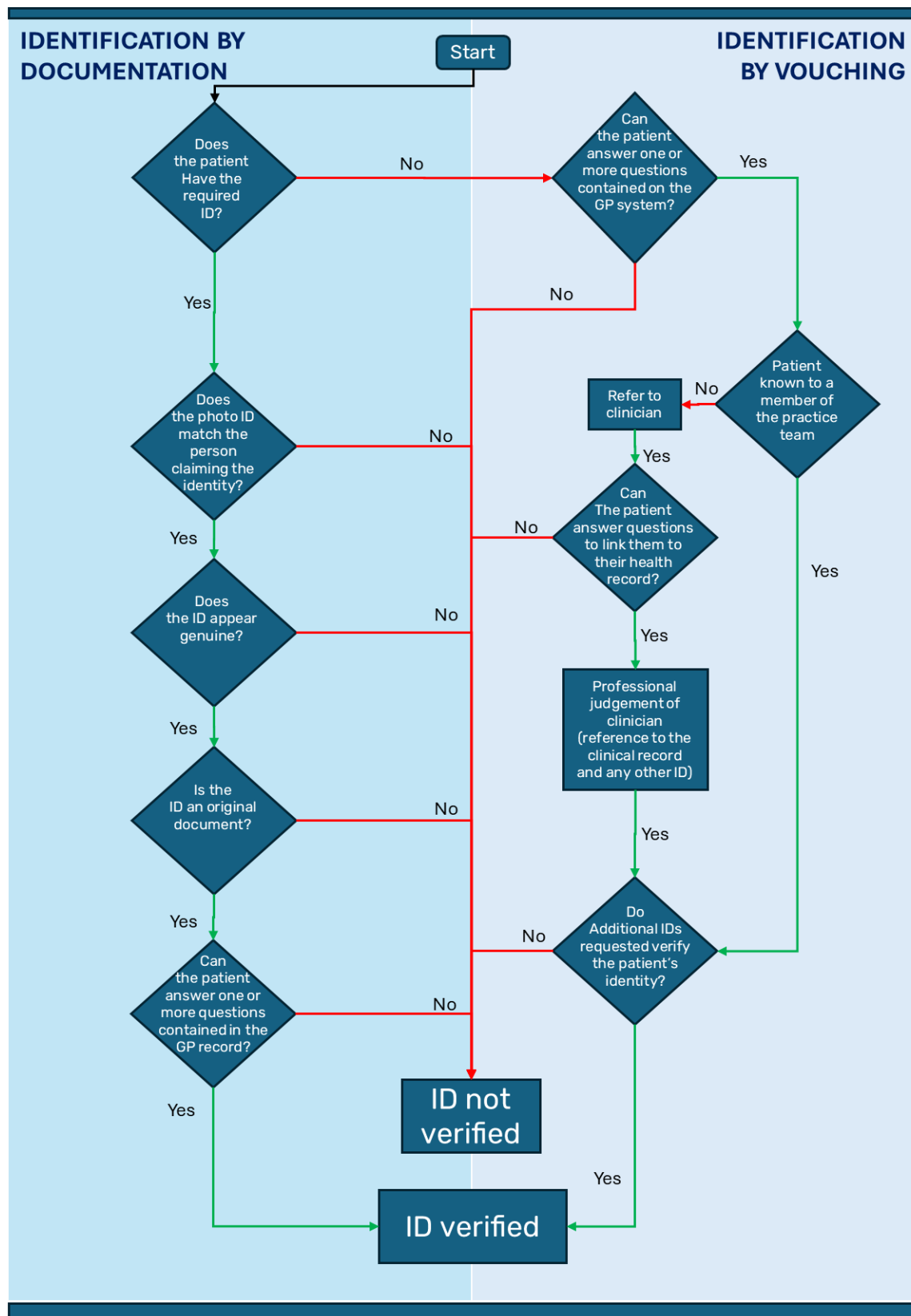
Note: The patient will by default be able to access those services provided to all patients at the GP practice. Practices should bear in mind that it will be necessary to consider clinical assurance where the practice provides access to summary care records and detailed coded health records.



Annex C: Glossary of Terms

Term or Abbreviation	Definition and further information
Identity Verification	Verification of identity evidence that may be presented by a person to support proving their identity.
Physical Comparison	Comparing the likeness of a person to trusted photo documentation that they have presented to support proving their identity. For example: a passport or driving licence.
Health Professional	A person employed by the organisation for the purpose of delivering NHS services. This includes clinical staff and non-clinical staff with delegated authority to undertake activities that relate to the delivery of those services.
Clinical Staff / Clinicians	A medically qualified health professional, registered with a professional body, who is directly responsible for the care and treatment of individuals.
Authentication	Authentication of a person's identity. Credentials issued and checked on subsequent visits.

Annex D: Process Chart (Guidance)



Note: Identification by vouching should be considered on a case-by-case basis, and in some cases will be based on professional judgement.