



A guide to understanding the UK Trust Framework

Digital Right to Work and DBS criminal record checks have changed in line with the UK Trust Framework. Make sure you adhere to the latest UK government guidance



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A guide to understanding the UK Trust Framework

The UK Trust Framework has changed the way digital identity verification is carried out in the UK.

Summary

As of October 1st, 2022, changes have been implemented in the identity-checking landscape, introducing new digital standards.

The **UK Digital Identity and Attributes Trust Framework (UKDIATF)**, the UK Trust Framework, has been established to facilitate convenient online identity verification, access to regulated products or services, and secure reuse of identity credentials.

For businesses, the new framework offers a well-defined set of standards and a marketplace for selecting certified identity providers.

Sector-specific trust schemes, impacting DBS criminal record checks, Right to Work, and Right to Rent checks, became effective on 1st October 2022.

Businesses must enlist certified Identity Service Providers (IDSPs) for ongoing digital DBS checks. For Right to Work checks, businesses must either conduct in-person meetings for manual document verification or use certified IDSPs.

Businesses should consider establishing strong commercial relationships with certified IDSPs and fine-tuning their internal processes. They should thoroughly investigate and evaluate which accredited provider is the most suitable for their needs, ensuring that their processes align with the latest government guidance.



Introduction

The Digital Identity and Attributes Trust Framework (UKDIATF) is a new set of standards, rules and best practice guidelines for the digital identity market. It allows people to use their digital identity for multiple purposes such as opening a bank account, renting property and starting a new job, without having to prove their identity every single time.

The UK Trust Framework was set up to:

- Help people prove who they are without the need to repeatedly re-verify physical documents. If someone wants to prove their identity when buying a house, opening a bank account or starting a new job, they should be equipped with the tools to do so quickly and securely
- Codify rules around data protection, security, privacy and inclusivity
- Make people's lives easier and boost the country's £149 billion digital economy

Understanding the UKDIATF

A digital identity is a digital representation of an individual, i.e. a collection of information, which demonstrates an individual is who they say they are.

In 2019, the UK government ran a consultation to determine how to support the development and secure use of digital identities. It received over 100 responses from organisations that anticipated being consumers or creators of digital identity tools or services.

Based on the responses to the consultation, the government developed principles to frame the digital identity policy in the UK. The first working version of the UKDIATF was published in February 2021. Following consultation, revisions and implementation of new processes, the [latest version](#) of the UKDIATF document was published in June 2022. The UKDIATF covers organisations which fall into the following categories:

- Identity Service Provider (IDSP)
- Attribute Service Provider
- Orchestration Service Provider
- Relying Party

The service providers are required to undergo a certification process, completed by a UKAS-accredited certification body.



What has changed

Impact on identity service providers (IDSPs)

IDSPs must use the guidance laid down in the UK Trust Framework on how to prove and verify someone's identity. **IDSPs are required to go through a certification process** which includes regular audits and periodic recertification to ensure all the rules and requirements listed in the UK Trust Framework are satisfied. IDSPs who are certified against the UK Trust Framework are issued a **Trust Mark**. This visual representation makes it easier for users to identify trustworthy providers.

Impact on relying parties

Relying parties are the lawyers, recruiters, employers, estate agents, banks etc. who will use the information provided by IDSPs to run digital identity checks. Relying parties do not need to be certified against the UK Trust Framework to adopt digital identities.

With the UK Trust Framework impacting processes involving identity verification such as Right to Work, Right to Rent, DBS criminal record checks, Anti-money laundering etc., the relying parties need to **make sure they use certified IDSPs** for digital identity verification.

Impact on regulators

The Department for Digital, Culture, Media and Sport (DCMS) has worked extensively with industry stakeholders during the creation of the UK Trust Framework. It is expected that the national framework as well as sectoral frameworks will gain the endorsement of relevant regulatory bodies.

Recently, the Regulatory Response Unit, a cross-sector group of regulators including the Financial Conduct Authority (FCA), Solicitors Regulation Authority, Law Society of Scotland and many others have released a statement in support of digital identity verification adoption.

Identity verification methodology (GPG 45)

[Good Practice Guide \(GPG\) 45](#) is a government methodology incorporated in the UK Trust Framework. It is written by Government Digital Service (GDS) with help from public and private sector organisations. Its purpose is to guide the collection and verification of digital identity, as well as increase the confidence that can be placed in someone's digital identity created by a digital IDSP. IDSPs must validate and provide evidence that they meet the requirements of GPG 45.

What remains unchanged?

While the UK Trust Framework strives to facilitate the adoption of digital identity products in the UK, it maintains a **provision for manual identity checks to ensure accessibility for users** who are unable to utilise the online service.

One such example is the Right to Work checks. With the temporary COVID-adjusted Right to Work guidance ending on September 30th, 2022, businesses must now engage a certified IDSP or conduct face-to-face meetings with candidates.

Benefits of using a digital IDSP

- ✔ Significantly faster employment checks
- ✔ Improving the security of your process by reducing fraud risk
- ✔ Eliminating the risk of human error
- ✔ Improving the scalability of processes to reach more candidates/clients
- ✔ Automating recording of transactions, document and data storage
- ✔ Enhancing candidates/clients experience and their perception of your business

Comparison between manual vs digital identity checking

| | Manual | Digital |
|------------------------------------|--|--|
| Collecting documents | Documents are collected via unsecured email, via post or in-person, and stored physically. | Documents are collected online via a secure encrypted portal and stored securely in digital form. |
| Checking authenticity of documents | The identity document is reviewed through visual examination. Results may vary depending on the training and tools available. The UKDIATF and GPG 45 are introducing training requirements for this process which will increase time, cost, liability etc. | The identity document is verified against many online secure sources of data. Checking the authenticity of identity documents digitally is a robust process that involves checking image quality, data integrity, and consistency, and gives accurate results. |
| Verification | The process can take up to two weeks. You may have to meet candidates face-to-face to verify their identity against their ID documents. | Advanced biometric comparison enables you to verify, identity and onboard in minutes. |

Sector impact

Sector trust schemes

The UK Trust Framework has been developed to work for identity verification, processed across the entire economy. Multiple sector-level schemes are already developed or will be developed under it. The reason for this is to provide sector-specific advice when it comes to the implementation of UK Trust Framework standards. The sector schemes are an opportunity to adapt the identity-checking methodology according to the requirements and levels of risk of each sector.

Sector-level identity schemes consist of different organisations that agree to follow a set of specified rules for using digital identity. The rules for specific schemes are not largely different to those for the UK Trust Framework, they may just be reframed to help practical applications of the specific sectors.

The organisations within a scheme are likely to be bound together by being from the same sector or providing a similar service to their users. The sector schemes currently in development are:

TISA for financial services

TISA or The Investing and Saving Alliance is a professional body organisation for UK financial services. It is currently developing a Digital ID scheme and governance body specifically for financial service firms.

The scheme will follow both the UK government, DCMS and FCA standards for identity checking and will allow Financial Service providers to use digital identity to conduct necessary AML and KYC checks with the help of certified identity services.

MyIdentity for the home buying and selling sector (HB&S)

The scheme called MyIdentity will represent anyone involved in the HB&S chain, including estate agents and mortgage intermediaries.

Its centrally agreed framework will be aligned with DCMS and [Practice Guide 81](#).

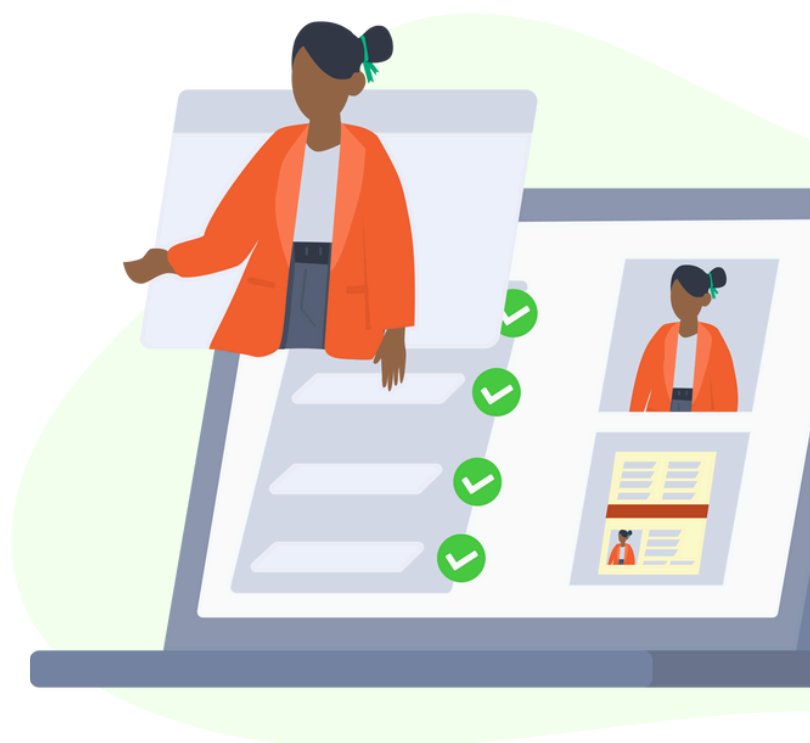
Etive has set up a portal to enable users to access any relevant information at myidentity.org.uk.

Pensions Dashboard Programme

The Pensions Dashboard Programme (PDP) is a digital service that enables individuals to see all their pensions in one place. They aim to provide an identity service that will fit under the UK Trust Framework, having identified the latter as an integral step toward a safe and secure digital identity market in the UK.

Right to Work, DBS and Right to Rent

Outlined on the next page in detail.



Right to Work, DBS & Right to Rent

Timeline(s)

Since April 2022, digitally processed **DBS** checks have been possible using a certified Identity Service Provider (IDSP).

Several IDSPs have gone through the process of certification. By opting for a certified provider, businesses can ensure that they meet the necessary standards for governance and verification of a candidate's identity, as recognised by the DBS.

The temporary COVID-adjusted Right to Work and Right to Rent checks initially planned to end in April 2022, were extended until September 2022. This extension aimed to allow employers ample time to establish relationships with IDSPs, facilitate a smoother transition and allow IDSPs to complete the certification process.

Starting from October 1st, 2022, businesses are obligated to choose between conducting face-to-face meetings with candidates for manual document verification or utilizing the services of a certified digital provider.

What are identity service providers (IDSPs) doing?

IDSPs are actively pursuing certification and undertaking various internal efforts to meet the stringent standards required for certification. This includes enhancing the security of their software, creating partnerships with other organisations, developing integrations, and more. Some IDSPs have completed accreditation and are now fully certified, with Amiqus being one of them. You can find the list of certified IDSPs on the gov.uk website.

What do I need to do?

You are not required to obtain certification personally. Instead, you can select an IDSP that has already achieved certification, eliminating the need for certification within your organisation.

The Department for Digital, Culture, Media & Sport (DCMS) and relevant scheme owners have made available an online list of certified providers [online list of certified providers](#), easily identifiable by the presence of the digital identity Trust Mark.

The transition period, intended for preparation regarding the changes to digital checks, has now expired. It is expected that firms have already adjusted their onboarding and implementation processes to comply with the mandatory rules governing digital checks.

When conducting Right to Work/Right to Rent verification, you still have the option to choose not to use digital checks and instead meet candidates in person. However, ensuring the authenticity of a candidate's document becomes considerably more challenging when relying solely on in-person inspection.



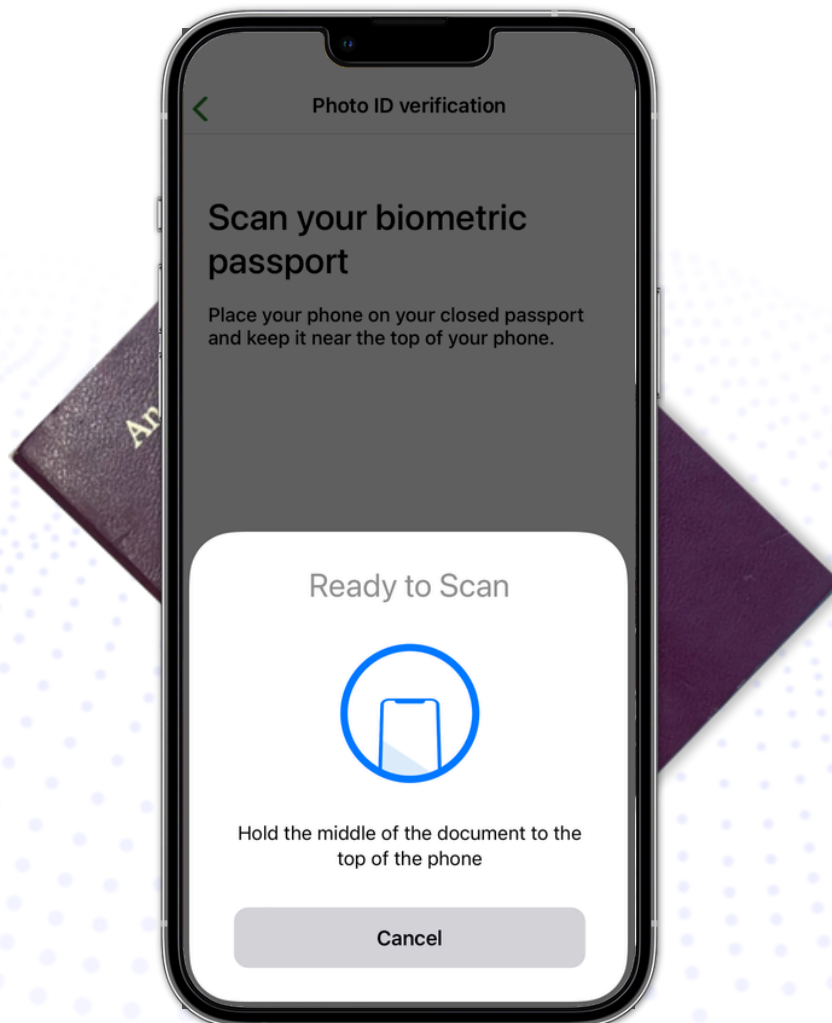
Penalties for failure to conduct Right to Work checks have significantly increased as of February 13, 2024. Employers can now face fines of £45,000 per illegal worker hired and £60,000 for repeat breaches.

Embracing digital identity checking offers numerous advantages. It helps mitigate the risk of human error, bolsters the security of the verification process, enables automated recording of transactions, documents, and data, improves scalability, and elevates the perception of your organisation by your clients and candidates.

The UK Trust Framework is expected to eventually encompass the entire identity-checking landscape, and multiple sector-level schemes have already been developed or are planned to be developed under it, as described earlier. Therefore, it is highly probable that your business will be impacted in some way or another.

What does it cost?

There is a small cost to digitally verifying individuals' data to the UK government standards. However, you will save money by going digital due to low insurance premiums, as well as save time with a faster and more efficient process.



“

Failure to conduct Right to Work checks on employees poses a significant risk. The UK government stipulates that businesses may face civil penalties of up to £45,000 per worker for non-compliance.

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Certification and trials

What is currently happening?

The Home Office guidance on Right to Work checks along with DBS have been identified as key trial schemes where we have witnessed the first use of 'government standard' digital identity.

Both checks are an important part of the pre-employment screening process and require the use of a certified IDSP when conducted digitally.

Several IDSPs have gone through the process of certification. By using a certified IDSP, you will know that your business is meeting the highest standards for verification of a candidate's identity.



Who has to become certified?

Under the UK Trust Framework, all IDSPs like Amicus need to be certified. You don't need your own business to be certified. As long as you choose to work with a service provider that is certified and carries a Trust Mark, there will be no certification requirements for your organisation.

What is the certification process?

Under the UKDIATF, certification is completed by a UKAS-accredited certification body. Once the IDSPs are assessed by a combination of desk reviews and on-site audits, the certification body advises the DCMS and the IDSP of their recommendation regarding certification.

The DCMS then reviews the assessment process and, if all requirements have been met, the name, contact details, and certification status of the IDSP are published on the DCMS website. It is important to note that certification is a time-limited process and IDSPs need to undertake an annual audit and biennial recertification to remain on the list of certified IDSPs. A step-by-step process for how providers become certified against the UK Trust Framework and Right to Work, Right to Rent and DBS Schemes can be found on the [DCMS website](#).

What does certification mean for you?

It makes procurement easier for you by turning complex requirements into something recognisable. You can look for certified IDSPs and have confidence that your chosen IDSP meets relevant scheme guidance and the standards set out in the UK Trust Framework. This means recruiters and employers can reduce risk by recruiting more safely. They can verify and assure prospective employees' identities and eligibility using consistent and more secure methods.

Conclusion

The new rules laid down by the UK Trust Framework provide a gold standard of assurance within a typically complex and fragmented marketplace of service providers to navigate for recruiters and employers. With the new Right to Work legislation coming into force on 1st October 2022, recruiters and employers must work with a certified IDSP to carry out digital Right to Work checks.

Besides the certification status, firms need to decide what they are looking for in an IDSP, i.e. cost, integration, security etc. and choose one accordingly. As a certified IDSP and in alignment with the DBS and Right to Work schemes, Amiquis provides our clients with an end-to-end approach, covering all aspects of identity orchestration, verification, and digital back-office management.

[Book a free demo](#)



About Amiquis

Amiquis is the UK's leading trusted compliance and onboarding platform and one of the first ten Identity Service Providers certified by the UK government.

Trusted by 500+ organisations of all sizes across different sectors, we collaborate with regulators and governing bodies to ensure our software meets and surpasses regulatory requirements.

Whether it's digital identity verification or pre-employment screening, Amiquis empowers you to carry out a full range of checks and end-to-end onboarding, all from a single platform.

Get in touch: amiquis.co | sales@amiquis.co