

Photographic Standards Policy

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A business review has been carried out regarding the photographic standards policy which looked at ways of standardising customer, examiner and photo industry communications across all channels. The review team considered the importance of balancing the impact on the business with the need to produce high quality passports with a viable biometric that will meet current and future requirements. The Service Delivery Committee (SDC) has endorsed amendments to the existing policy to remove any ambiguity that may have previously caused confusion for the customer, examiner and the photographic industry.

The quality, style and appearance of passport photographs must meet the standard set by the International Civil Aviation Organisation (ICAO). This will make sure that a facial recognition image can be captured from each passport photograph which will be acceptable at UK and international border controls for both manual and automatic checking.

Examining staff will be responsible for making sure applicant's photographs meet the standard.

Some photograph checks will be done automatically (Photo QA), but examiners will **still** need to carry out manual checks as well. **The Photo QA checks are in addition to, not a replacement for, the manual checks. The final decision for accepting or rejecting a photo rests with the examiner.**

As more countries install automatic border controls, anyone whose passport photograph does not meet the standard may be delayed by more thorough checks. It is in our customers' best interests that we make sure they submit good quality photographs that comply with the standard, to prevent these potential delays.

This policy consists of a general standard for all applicants 6 years and older as well as separate standards specific to children aged 5 years or under.

All passports holders aged 6 years or over must hold passports that fully meet the standard, unless they fall into an exception criterion. As the passports of children aged 5 years or under will expire before they reach the age of 11 years the application of the standard to these applicants can be less stringent.

Black and white photographs should no longer be accepted. This is because it is difficult to distinguish skin-tones and does not provide a true likeness of the applicant, e.g. eye colour.

There are a number of instances where policy has been softened to minimise operational impact; over time these issues have been resolved. This amended policy reflects these changes.

Photograph requirements for applicants aged 6 years and over

These photographs must meet the full standard. The photographs must show the following:

- **Applicants wearing uniforms.** Applications that are submitted with photos that show the applicant wearing any type of uniform e.g. military uniforms, can be accepted as this is down to customer choice. In the case of school portraits and copyright issues, the responsibility of obtaining consent from the copyright holder of a school photograph lies with the customer, and IPS can assume consent has already been obtained.
- **Background colour.** White backgrounds can cause glare, definition and contrast issues between the applicant and the background. As from 1st October 2008, IPS will reject images on white backgrounds and only light grey or cream backgrounds will be acceptable. **Please Note: If a photograph received on a cream or light grey background is lightened by the scanning process to the extent that the background appears white on the system, but has suffered no other detrimental effect, then it should be accepted.**
- **Quality of Paper.** Photographs should be provided on photographic paper. Once the removal of white backgrounds is in force, the issue of backprints/watermarks should no longer be a concern Photographs should only be rejected if the watermark shows through on screen. Please also note that these photos must also be free of creases, serrated edges and ink marks, free of any visible damage (this includes staple marks or impressions from paper clips used to keep photographs together).
- **No shadows.** Shadows obscure facial detail and therefore prevent the capture of a good quality image. Photos with shadows that may interfere with the ability to take a viable biometric should be rejected. Small shadows beneath the ears can be accepted, as long as there is a clear definition between the face and the background. A

comprehensive list with visual examples (photographs taken) of acceptable/non-acceptable images is available to assist examiners in cases of doubt.

- **The applicant's full face, with head facing straight towards the camera.** If the applicant is not full face or facing forwards, their facial features will be captured at an angle, and facial detail will be obscured. For example, they may not meet the requirement for both ears to be visible unless covered by hair. The head must be straight, not tilted down or up (head tilted backwards or forwards should be rejected), to one shoulder, or facing left or right, otherwise Photo QA will have difficulty in finding the eye positions as well as the photo not being ICAO compliant. All photographs showing the head tilted down or up must be rejected. All photographs showing the head turned to the left or right must be rejected. The chin and the crown (top of the head) must also be clearly visible; if it is only the hair that has been cropped from the photograph this can be accepted. Photographs with the head tilted to one shoulder, should only be rejected for head tilt if Photo QA has failed the photograph. A comprehensive list with visual examples (photographs taken) of acceptable/non-acceptable images is available to assist examiners in cases of doubt.
- **A neutral expression.** That is without smiling or frowning (defined as any expression that affects the contours of the face which will not allow IPS to accurately obtain biometric measurements).
- **Mouth closed.** If the mouth is open, facial features are distorted and an accurate representation of the applicant is not captured.
- **No head covering.** Headwear can cause shadow or even obscure portions of the face. See paragraph 5.4 for advice on headcoverings worn for religious reasons.
- **Two photographs.** Both photographs should be identical.
- **Taken within the last month.** Examiners are not expected to verify this, however if it is obvious or known that the photo is older, the examiner should reject the photo. This includes where examining and approving the case has taken some time. If it is over a year since the application was submitted a new photograph should be requested.
- **Taken against a light grey or cream plain background** so that the features are clearly distinguishable against the background (please also refer to second bullet point above).
- **Printed on plain white photograph quality paper.** Very glossy or textured paper can produce side-effects including haze, glare and hotspots and distort the image on-screen. If the on-screen image shows any of these side-effects then they should be rejected. Paper that is not white on the reverse can be accepted. Paper with serrated edges should not be accepted. Examiners may accept a watermark unless it clearly shows through the scanned image on-screen. Embossed photograph paper should not be accepted.
- **Free of creases and ink marks.** The markings or writing will often show through on the scanned image.
- **Clear of writing on the back and front.** If a countersignature is required, only one of the photographs should be certified on the back, the other must be left blank. If the photograph scanned onto the system

has writing or printing on the back, and any of the writing shows through the scanned image on screen it must be rejected. This can clearly be seen during Photo QA. If the writing does not show through you can accept the photo. **Please Note: This can clearly be seen during Photo QA. If the writing does not show through you can accept the photo.**

- **Be in sharp focus and clear.**
- **Have a strong definition between the face and background.** Photographs that are blurred, too dark or too light are not acceptable (Examining staff should refer to the photo that has been scanned on the system to establish if the photo is too light, dark or blurred.)
- **Photographs should not be printed at home.** Photographs that are printed at home are unlikely to be acceptable because the image and paper are often not of good enough quality; therefore photographs that do not clearly match the quality of professionally printed photographs should be rejected.
- **The intended passport holder on their own.** Toys, dummies or people visible in the background are not acceptable.
- **No “red eye”.** (Red eye occurs when the lighting reflects off the back of the eye ball.) The effect of red-eye is easily seen when a red circle or crescent shape appears in the pupil. The photo must also be rejected if the red-eye is visible on the physical photo as opposed to the QA screen only.
- **Eyes clearly visible, no reflection.** (Without sunglasses or any type of tinted glasses, and no hair across the eyes.) If the applicant is wearing glasses, both eyes must be clearly visible through the glasses and the rims must not obscure the eyes in any way. Where hair is on the face, if the photograph has passed Photo QA and the eye positions have been correctly identified, it should only be rejected if hair is clearly across one or both eyes. So, photographs showing hair partially or completely across one or both eyes must be rejected. **Please Note: Glare on the applicant’s pupil, while not desirable, can be accepted as it will not effect the biometric.**
- **No sunglasses or any type of tinted glasses.** It should be strongly recommended that customers remove spectacles before the photo is taken.
- **No obvious reflection or glare on the applicant’s glasses, if worn.** If the reflection prevents the eyes from being seen clearly or Photo QA is not able to locate the eye positions the photograph must not be accepted. Reflection or glare on glasses that does not cover the eyes can be accepted. (Any customer experiencing problems with glare on glasses should be advised to remove their glasses).
- **A close-up of the applicant’s head and shoulders so that the face covers approximately 45 to 75% of the photograph (between 29 and 34mm high).** To ensure adequate distance (pixels) between key facial reference points are captured when scanned, head size should be between 29 and 34 mm high. This is not an absolute requirement as the key measurements is the number of pixels between the eyes once scanned, which will be carried out during Photo QA. Previous testing showed that these head sizes gave optimal pixel numbers, but the

templates originally distributed to Post Office Check and Send branches accepted images that subsequently failed Photo QA on this key measurement. New templates are being distributed that means the distance between the eyes instead of the head size. It is also intended that the template will be available to the wider photographic trade via the IPS website.

- **Eyes in the top 40 to 70% of the photograph (vertical eye band).** New templates will be available to Post Office Ltd Check and Send outlets to ensure that this requirement has been fulfilled. The template will also be available to the wider photographic trade.
- **Eyes looking forward.** To ensure an accurate representation of the applicant is captured, they should be looking directly at the camera.
- **Both the applicant's eyes open.**
- **Photographs should be 45 millimetres (mm) high x 35 millimetres (mm) wide.** Examiners are not expected to measure photographs. If the photograph is too small, white gaps will show around the edges of the scanned photographic image on the Photo QA screen. If it is too big, the head size on the photograph scanned into the system will have become unacceptably large when Steria cuts it down to size
- **Nothing covering the face.** Birth marks, beards, moustaches, bindis ("coloured dots" on the forehead) and permanent tattoos should be accepted. Most body piercings such as lip rings, eyebrow piercings, nose studs or small rings can be accepted. However, if the body piercing is large or obtrusive, and therefore makes it difficult for Photo QA to judge where the outline of the eyes, mouth, nose, chin or cheekbones is, the photograph must be rejected. Extreme cases of faces covered in multiple piercings must be rejected. Piercings which create reflection will generally fail Photo QA and so must be rejected. A comprehensive list with visual examples (photographs taken) of acceptable/non-acceptable images is available to assist examiners in cases of doubt.
- **No mirrored images.** Photographs where the image is reflected left to right or right to left so that the picture is flipped from one side to another are not acceptable. This will only be obvious to an examiner on comparison with a previous passport if the applicant has a distinguishing mark or disability that is visible on one side of their face. In some rare cases, the photograph in the previous passport may in fact be a mirror image. If this is the case the applicant will have to confirm this in writing and state that the new photographs are a true likeness. Mirror images may cause issues at border control, so it is imperative that where a potential mirror image is discovered, it is challenged with the applicant.

Photograph requirements specific to children aged 5 years and under

Passport photographs for children aged 5 years and under (please note that this includes children who have not reached their 6th birthday) must show a true likeness of the child to help prevent child abduction and child trafficking. It is not necessary for these photographs to meet the full requirements of the

standard. A different, more simplified standard can apply, but it remains important that the photograph shows a clear image that is a true likeness of the child.

The requirements are as follows:

- **Both of the applicant's eyes open.** Unless the applicant is aged less than 1 year. Permanent or long-term eye patches such as those used to correct children's squints can be accepted
- **Neutral expression.** This can be waived for babies and children under six years
- **Mouth closed.** This can be waived for babies and children under six years
- **Two photographs.** Both photographs should be identical.
- **Taken within the last month.** Examiners are not expected to verify this, however, if it obvious or known that the photo is older, the examiner should reject the photo. This includes where examining and approving the case has taken some time. If it is over a year since the application was submitted a new photograph should be requested.
- **Taken against a cream or light grey plain background** so that the features are clearly distinguishable against the background (please also refer to section 2.1 second bullet point of this policy).
- **Printed on plain white photograph quality paper.** Very glossy or textured paper can produce side-effects including haze, glare and hotspots and distort the image on-screen. If the on-screen image shows any of these side-effects then they should be rejected. Paper that is not white on the reverse can be accepted. Paper with serrated edges should not be accepted. Examiners may accept a watermark unless it clearly shows through the scanned image on-screen. Embossed photograph paper should not be accepted.
- **Free of creases and ink marks.** The markings or writing will often show through on the scanned image.
- **Clear of writing on the back and front.** If a countersignature is required, only one of the photographs should be certified on the back, the other must be left blank. If the photograph scanned onto the system has writing or printing on the back, and any of the writing shows through the scanned image on screen it must be rejected. **Please Note: This can clearly be seen during Photo QA. If the writing does not show through you can accept the photo.**
- **Be in sharp focus and clear.**
- **Have a strong definition between the face and background.** Photographs that are blurred, too dark or too light are not acceptable. (Examining staff should refer to the photo that has been scanned on the system to establish if the photo is too light, dark or blurred.)
- **Photographs should not be printed at home.** Photographs that are printed at home are unlikely to be acceptable because the image and paper are often not of good enough quality; therefore photographs that do not clearly match the quality of professionally printed photographs should be rejected.

- **The intended passport holder on their own.** Toys, dummies or people visible in the background are not acceptable.
- **The full head, without any head covering**
- **No “Red Eye”.** (Red eye occurs when the lighting reflects off the back of the eye ball.) The effect of red-eye is easily seen when a red circle or crescent shape appears in the pupil. The photo must also be rejected if the red-eye is visible on the physical photo as opposed to the QA screen only.
- **No sunglasses or tinted glasses**
- **No mirrored images.** Photographs where the image is reflected left to right or right to left so that the picture is flipped from one side to another are not acceptable. This will only be obvious to an examiner on comparison with a previous passport if the applicant has a distinguishing mark or disability that is visible on one side of their face. In some rare cases, the photograph in the previous passport may in fact be a mirror image. If this is the case the applicant will have to confirm this in writing and state that the new photographs are a true likeness. Mirror images may cause issues at border control, so it is imperative that where a potential mirror image is discovered, it is challenged with the applicant.

A comprehensive list with visual examples of acceptable and unacceptable images is available to assist examiners in cases of doubt.

Exceptions to policy

Photographs of applicants with a physical or mental impairment that prevents them from meeting one or more of the following criteria can be exempted from that criterion provided it is clear from the photograph that the applicant cannot meet the criterion. These are the standards that may be relaxed if the applicant fails to meet them:

- Eyes in the top 40 to 70% of the photograph (vertical eye band).
- The applicant’s full face, with head facing straight towards the camera (head roll). Regardless of this exception to head roll, it is important that the photo shows the applicant’s full face i.e. facing forward. There may be rare instances where this is not possible; such cases must be dealt with sensitively and should be accepted if we are advised, in writing, that a full face image is not possible because of disability.
- Neutral expression.
- Mouth closed.
- Eyes open. Permanent or long-term eye patches such as those used to correct children’s squints are also acceptable. This should be supported by a written statement from the applicant, their parent or doctor. Temporary eye patches must be removed.
- Eyes looking forward.

If it is not clear from the applicant’s photograph that they have a condition which prevents them from meeting the criteria, the application should be

supported by a written statement from the applicant, their parent/carer or doctor.

Where it is not clear from a photograph that the applicant cannot meet a criterion, but the counter examiner is satisfied the applicant is unable to meet the criteria because of a physical or mental impairment, the counter HEO should note the back office form. This should be accepted and case noted by the back office HEO.

Head coverings for religious reasons can be accepted as long as they do not cover the face. Also, if there are clear medical reasons, for example, head wounds, hair loss through medical treatment or illness, a scarf or bandage can be accepted as long as it does not cover the face. If the head covering is not clearly for religious or medical reasons, the photograph should be rejected initially. If the customer replies in writing that the head covering is for religious or medical reasons, this can be accepted. However, if the examiner continues to have doubts on whether to accept the head covering or not, they should refer the case to their line manager for a decision to be made, and possible escalation via the Policy Network Officer to Operational Policy.

Rejections

If a customer's photograph has already been rejected one or more times, either by Steria or the Identity and Passport Service (IPS), and their new photographs are also unacceptable, contact the customer by phone rather than by letter to explain clearly what is wrong with the photograph. In these circumstances, written contact should only be considered following unsuccessful attempts to contact the applicant by phone. Telephone calls, and attempted telephone calls, should be case noted.

Should an applicant's photograph be rejected, but they refuse to send in a further photograph, a passport should not be issued. The onus is on the customer to provide a correctly completed application form, documents, payment and photographs that meet our requirements. If these criteria are not met a passport should not be issued and any request for a refund should be dealt with under the refunds policy.

Customers whose photographs are rejected at the counter can in most cases be directed to the photo booth located in most regional offices. Where this is not possible, direct the customer towards a local photo booth or studio. It is acceptable for staff to advise they believe a certain booth provides acceptable photographs. What is not acceptable is for staff to direct customers towards particular makers to the exclusion of others. For example, "We've received acceptable photographs from the booth in Tesco / Snappy Snaps on the corner" is allowed, because you can speak from experience and are not inferring all Snappy Snaps etc. produce acceptable photographs – only the branch or booth you have actual experience of. Saying "You can use any Photochoice / Snap / Tesco / Photo Me booth / photographer's because they are approved," is not allowed, because this implies we approve one company

over all others. This will help the IPS to offer good customer service whilst remaining impartial.

If a customer asks for advice on where to go if they need to send in new photographs of a baby or young child, advise that the IPS recommends photographs of babies and young children be taken at photographic studios.

The photograph to be used for the passport must show the same person and, appear to show the person at the same age, as in the certified photo. If the original photograph received is acceptable, but the countersignature is not then, to, cover all eventualities, request 2 further photographs, one countersigned. However, if you are satisfied that the photograph already scanned onto the system shows the same person, and appears to show the person at the same age, as in the new certified photograph then the photograph already scanned onto the system can be used in the passport provided it passes all manual and automatic photograph policy standards.

Return of Photographs

Photographs should not be returned to the applicant as they become part of IPS official records. However, if an applicant specifically requests the return of unused photos in writing, then any uncertified photos may be returned.

Annex A - Questions & answers: photographic standards policy

1. Can bare shoulders be accepted?

The customer's state of attire, including showing bare shoulders or the wearing of a uniform, is a matter for the customer and not the concern of the IPS. Under no circumstances should a photograph be rejected purely because the shoulders and upper body are uncovered without the authorisation of a line manager.

2. Is it acceptable for customers to wear Alice Bands?

Yes. Alice bands that cover the crown can be accepted as long as there is a contrast between the head and the background. However, should the Alice band change the shape of the head, it should be rejected.

3. Can photographs where the applicant is sitting at an angle be accepted as long as they are facing forward?

The ICAO standard states that the applicant should be facing square onto the camera, this includes face and body. If they are not sitting square to the camera it is very unlikely that the photo will be full face. Reject.

4. Are photographs where the applicant is wearing a collar pulled up to ear level acceptable?

Not if the collar is obscuring facial features.

5. How should we define 'eye'?

The 'eye' means the pupil, iris and white of the eye.

6. How should we define 'eye socket'?

The 'eye socket' is the hole in the skull that the eyeball rests in. It typically extends from just below the eyebrow to just below the bottom eyelid.

7. Is it recommended new photos are requested from applicants with temporary facial injuries, e.g. black eye? If not, should a disclaimer be included explaining problems could be encountered at border control?

As a black eye is not a permanent feature we should reject. If imminent travel is claimed then we should make it clear the photo is not acceptable, but issued to facilitate travel and the passport must be replaced at the customer's cost as soon as possible. A case note should be added to show that the photo has been accepted to facilitate urgent travel, and that the applicant has been advised that they must obtain a new passport when the eye patch is removed at the customer's own cost.

8. If a customer naturally has a very large head and has his photograph taken in a photo booth, his photograph could fail on either distance between the eyes or head size. What advice can examiners give in these circumstances?

If the applicant cannot obtain an acceptable photograph from a booth it would be appropriate to suggest that a photographer be used.

9. Elderly people are occasionally stooped. Can these photographs be exceptionally accepted if Photo QA fails them on head roll?

If the customer has a disability which prevents them from looking straight at the camera their photograph should be considered under the exceptions criteria.

10. Should a photograph showing a visually impaired or blind person wearing tinted glasses be rejected?

Yes, the eyes must be clearly visible (with no sunglasses or heavily tinted glasses, and no hair across the eyes).

11. Should I accept or reject a photograph of a visually impaired or blind person if their eyes are shut?

You should accept such a photo (see section 5.1 “exceptions to policy”).

12. Is the full fee required from a customer when he/she has undergone plastic surgery or suffered trauma to their face and the examiner cannot identify the passport holder from the photo in their passport?

Yes, when there is a permanent and significant change to an individual’s face such as they cannot be identified from the photograph on their passport, then they should apply for a passport at their own cost