



Home Office

# Vulnerability considerations for passports

Version 15.0

His Majesty's Passport Office guidance about identifying and handling vulnerability and safeguarding issues connected to our customers.

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# About: Vulnerability considerations for passports

This guidance tells His Majesty's Passport Office staff:

- what vulnerability means
- how to identify vulnerability considerations before, during and after a passport application
- what to consider when they identify a vulnerability indicator
- how to deal with passport applications when they identify a vulnerability indicator

## Contacts

If you have any questions about the guidance and your line manager or senior caseworker cannot help you or you think that the guidance has factual errors then email the Guidance team.

If you notice any formatting errors in this guidance (broken links, spelling mistakes and so on) or have any comments about the layout or navigability of the guidance then you can email the Guidance team.

## Publication

Below is information on when this version of the guidance was published:

- version **15.0**
- published for Home Office staff on **10 April 2025**

## Changes from last version of this guidance

This guidance has been updated to:

- reflect the change in our sovereign from Her Majesty Queen Elizabeth II to His Majesty King Charles III
- explain you must also consider if the customer can have an overlap passport for an exceptional reason
- update the referee terminology
- include references to our Contact Centres
- to reflect a change of name and role for the Guidance team
- to include links to:
  - Confirming identity checks which may help identify vulnerabilities related to child abduction and child trafficking
  - Safeguarding: consent issues which explains how to deal with safeguarding issues where we need additional consent for a child's application

- advise examiners that where a local authority have caring responsibilities for a child, they do not need to pay a fee when registration is required to gain British citizenship
- tell examiners what they must do if a customer advises them they believe they have been a victim of identity abuse
- make it clear how an examiner must send the customer an identity fraud leaflet
- clarify the General Register Office (GRO) no longer provide letters to confirm those under the age of 18 have not had their births registered

## **Related content**

[Contents](#)

# What we mean by vulnerability

This section tells HM Passport Office operational staff what we mean by vulnerability and about our role in how we support our vulnerable customers.

HM Passport Office defines vulnerability in three different ways:

- the presence of a mental or physical disability (or external factor) that could impact on a customer's ability to access our products and services
- the risk to a customer of having something done to them because of a vulnerability, for example, child abduction or human trafficking
- an activity or attempted activity that might occur as a result of someone's vulnerability, for example, suicide or being dishonest to try and get a passport.

Our role in supporting vulnerable customers is mainly a reactive one. We are often told about a vulnerability before or during the application process or, sometimes, after a passport has been issued.

We must think about each case individually and take the most appropriate action based on the circumstances of that specific case. It is important to remember that a vulnerability can occur and impact on both the travel and also the identity aspect of an application.

We must maintain records of vulnerable customers when we learn about vulnerability from information given to us by the customer, members of the public or by other UK and foreign government departments.

We meet our legal and Home Office responsibility by having policy and guidance in place that helps our employees identify the presence of a vulnerability and we have processes in place to make sure that any concerns are reported to the right areas, for example the police, or the Foreign, Commonwealth & Development Office (FCDO).

We also have a dedicated team in place (the Child Protection and Safeguarding team, based in Glasgow) to support the delivery of HM Passport Office's responsibilities in regard to vulnerability.

We must be aware that some of our customers may be vulnerable for more than 1 reason, for example there may be a mental health and child safeguarding vulnerability.

## Our role in supporting the vulnerable

Supporting vulnerability means we will try to reduce the impact of the vulnerability (if we can). We may do this by:

- supporting customers who cannot complete the standard application process or meet our requirements
- demonstrating sensitivity in how we communicate with our vulnerable customers and in how we ask for evidence about the vulnerability
- accepting and acting appropriately on notification of a vulnerability concern
- contacting the most appropriate area where concerns need raising more widely, for example, reporting concern to the police or to the FCDO
- highlighting and clarifying the most appropriate next steps that need to occur, for example, a court order needs to be produced before we issue a passport
- preventing the issue of a passport
- offering support to customers, for example signposting assistance available outside of the application process
- cancelling an existing passport

## When we become aware of a vulnerability

We may identify the presence of a vulnerability before, during or after a customer makes a passport application.

Individual customer circumstances may change, and this guidance focuses on what you must consider when a customer submits a passport application. We will update this guidance in the future, to explain what you must consider when you identify a vulnerability:

- before the customer makes a passport application
- after we issue the customer with a passport

## Vulnerability identified before an application is made

We may learn about a vulnerability before an application because:

- the customer asks us about meeting our application requirements (they are seeking information or are having problems)
- someone tells us about it

## Vulnerability identified during the application process

We may learn about the presence of a vulnerability during the application process because:

- additional documentation or information is required from the customer
- of an urgent request or change in circumstances
- someone tells us about it

## Vulnerability identified after a passport is issued

We may learn about a vulnerability after a passport is issued because:



- something happens to the passport holder
- someone else raises concern about the passport holder

## **Related content**

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# What vulnerability considerations are

This section tells HM Passport Office operational staff what vulnerability considerations are.

There are a number of personal or external factors which may result in an intended or actual passport holder being vulnerable (or causing someone else to be vulnerable).

The conditions and events listed below are not always a vulnerability in themselves but the impacts on the customer require us to consider if the presence of them might result in a vulnerability occurring. The consideration areas covered in this document are linked to:

- [mental or physical disability](#)
- [gender dysphoria](#)
- [child safeguarding and child welfare](#)
- [child abduction](#)
- [parental dispute](#)
- [victims of identity theft](#)
- [civil and political unrest](#)
- [overseas and UK crisis situations](#)
- [undocumented customers](#)
- [lack of documents or postal address](#)
- [confiscated passports](#)
- [abuse and exploitation](#)
- [suicide](#)
- [compassionate circumstances](#)

## What the vulnerability considerations show

For each vulnerability consideration, we have included:

- a description to explain what it is and when it may be a vulnerability
- what interventions (actions) we should consider using, for example:
  - offering support to a customer
  - preventing a passport from being issued to a customer
  - cancelling an existing passport
  - other specific interventions shown in current guidance (for example, referrals to the Counter Fraud or safeguarding team)
- links to our current guidance that relate to it and any legislation that may apply, for example the [Gender recognition Act 2004](#) and the [Equality Act 2010](#)
- specific overseas issues relating to it

## Case noting vulnerability considerations

You, the HM Passport Office member of staff, must record how you identified the vulnerability and any actions taken, for example, if:

- the customer claims to be vulnerable
- something during the application process makes us suspect there is a vulnerability
- we get information from another source to say there is a vulnerability

You must ensure that the record of this information is as factual as possible and you must avoid expressing any unwarranted personal judgement that is not evidentially grounded.

## Dealing with vulnerabilities sensitively

Dealing with vulnerabilities can be a sensitive issue for our customers. When dealing with an application that has a vulnerability consideration, you must:

- react to the information you have been provided with
- carefully consider what activity is required
- seek support or advice from your manager or the safeguarding team if you do not know what to do
- deal with the customer and any third parties fairly and sensitively

### Related content

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# Vulnerability: mental or physical disability

This section tells HM Passport Office operational staff about the mental or physical disability vulnerability consideration.

HM Passport Office considers all customer groups and, in providing products and services, seeks to support them by offering different ways to apply and by highlighting the services of third parties who support customers. Customers with a disability can usually access our services and products and may complete their application without any intervention (additional checks or support) from us.

This vulnerability happens when the customer is unable to:

- understand the application requirements
- apply online or using the paper application route
- meet our photo standards
- provide the relevant consent or authorisation in connection to the application
- provide us with the documents we need
- attend an interview
- sign a paper application or their passport and a third party is providing them with support
- sign a paper application or their passport and they are unaware that someone is making application on their behalf
- complete an online declaration and they are unaware someone is making an application on their behalf
- tell us that they do not want us to issue a passport

## Mental or physical disability: how we may identify it

We may:

- identify the vulnerability, if a customer or third party (for example, parent, relative or medical professional):
  - contacts us or our Contact Centres prior to the application and tells us about it
  - uses an address of a medical facility, for example, a hospital
  - tells us about the disability during the application process (for example, on the phone or when we invite the customer to an interview)
  - submits correspondence confirming a disability
  - submits a court order that was issued under section 15 of the [Mental Capacity Act 2005](#)
  - provides details of a disability on their application
- suspect the vulnerability, if:

- the customer's address shows they live in a supported community (in itself this is not evidence that a vulnerability is present or that they require support)
- the photo they submit does not meet our photo standards
- we get consent or an online declaration from a third party that shows a vulnerability may be present, for example power of attorney for health and welfare

## Mental or physical disability: dealing with applications

If we identify the vulnerability, we will offer support. If you, the HM Passport Office member of staff, identify the vulnerability during the application processes, you must:

- consider all the information that has been provided
- decide whether additional checks or investigations are needed to confirm if the vulnerability exists
- check the written confirmation of customers circumstances and ask for additional evidence (if you need it)
- check if you can apply an exception or exemption (for example, exceptions relating to interviews, photo standards or signatures)
- consider whether standard policy should apply if exception checks fail (for example, when a customer cannot provide evidence that they meet the exception criteria)
- check if the customer is already exempt from any of our usual process (for example, customers born before 2<sup>nd</sup> September 1929 who do not need to attend interview)
- check if the disability is likely to be temporary (if it is, you may consider issuing a restricted validity passport), for example a broken limb.
- apply sensitivity in any contact about the vulnerability and make sure you use the appropriate language, for example, the correct and current terminology for the condition.
- ask for help if you are unsure of what to do or if this guidance does not cover the situation you are faced with (from the Child Protection and Safeguarding team (CPSt), your manager, or the Quality Examination Support team (QuEST))

## Mental or physical disability: deciding what to do

The interventions (actions) you carry out may mean you need to:

- apply the correct exception, for example:
  - waive the interview and seek alternative evidence to support the application
  - override photo standards
  - issue a restricted validity passport
  - include the 'holder is not required to sign' observation
- refuse the exception (for example, if you do not have enough information or documentary evidence to apply an exception)
- refer the case to the Counter Fraud Team (CFT), to decide if the evidence may mean you need to refuse the application or cancel an existing passport

## Mental or physical disability: specific overseas issues

You must consider the relevant legislation in the country the customer is applying from. You may also need to consider whether the customer's mental or physical disability means that there is a need for the customer to request the support of the Foreign, Commonwealth & Development Office (FCDO).

## Mental or physical disability vulnerability consideration: legislation

The [Equality Act 2010](#) means we have a legal duty:

- not to discriminate against a customer on the grounds of disability, when we provide our services
- to make reasonable adjustments for disabled customers

### Related content

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# Vulnerability: gender dysphoria

This section tells HM Passport Office operational staff about the gender dysphoria vulnerability.

Gender dysphoria is a condition where a person experiences discomfort or distress because there's a mismatch between their biological sex (assigned at birth based on the appearance of the genitals) and their gender identity. It's sometimes known as gender incongruence.

The customer may be vulnerable because they are unable to meet our application requirements (not just because they have this condition).

## Gender dysphoria: when it may apply

Customers with gender dysphoria can usually access our services and complete their applications without our support.

This vulnerability may happen during the early stages of gender changes, if the customer:

- has difficulty changing their gender on their official documents, for example, because of:
  - the country they live in
  - their circumstances, for example they may not be able to produce documents
- is a dual national and the other country does not recognise gender changes
- does not identify in any gender (or identifies in both genders) and cannot be issued with a passport
- cannot provide other evidence, as the passport is the first document they are changing their gender on and they want to use it as a 'gateway document' (a document they can use to help change other documents)
- applies for a passport and their application is the first time they needed official confirmation of their gender change

As the Gender Recognition Act 2004 does not apply to those under 18 years of age for child applications, there are additional considerations in respect of evidence and authorisation and consent:

- when someone with parental responsibility requests to change the gender in a passport for a child (up until the child reaches the age of 16)
- when a young adult (16 – 17 years old) requests to change their gender in a passport
- because the Gender Recognition Act 2004 does not apply to those under age 18
- there is likely to be a smaller social footprint (less activity) showing the child uses the gender

## Gender dysphoria: how we may identify it

If the customer is able to provide all the evidence we require then there are no vulnerability considerations to make.

We may identify a vulnerability, if a customer, appropriate third party or someone with parental responsibility for the customer (for example, if the customer is a child or an adult with a disability):

- is unable to comply with our document requirements or cannot obtain confirmation
- confirms the customer is a dual national and their other country of nationality does not recognise gender change
- tells us about it during the application process

We may suspect the vulnerability, if:

- the renewal or replacement application is in a different gender to the one shown on the previous passport record
- the customer's photo (they submitted with their renewal or replacement application) appears to be in a different gender to the one in the passport
- the facial matching check fails and the customer's photo appears to be in a different gender to the one in the previous passport record but the gender on the application is the same
- the application form does not show a customer's sex marker or their application cannot continue through the online process because they have not declared a sex marker
- the customer tells us their appearance has dramatically changed and they have provided a referee when we would not normally need one

## Gender dysphoria: dealing with applications

If we identify a vulnerability, we will offer support. If you, the HM Passport Office member of staff, identify a vulnerability during the application process, you must:

- not disclose the customer's gender identity without their consent
- record the customer's change of gender in line with the gender recognition guidance
- make sure you use sensitive language when you contact the customer (see Gender recognition: customer contact)
- offer to discuss the matter with the customer if they are unable to provide the information required
- check any previous passport records and case notes for information about the gender if the application is a replacement or renewal
- check the outcome of any facial matching checks to see if you can identify the customer from their previous photo (you must contact the referee to confirm the customer's identity, if you need to)



- ask for evidence of the gender change (if the application shows we have asked for it but did not get it), for example, the gender recognition certificate (GRC)
- check the documents that confirm the change of gender meets our policy – if they do not, you must:
  - contact the customer by phone to ask for additional evidence (for adults only or applications for those aged 16 and 17 years when a court order is in force)
  - send a guidance query to the Quality, Examination Support team for advice about child applications, before you contact the person with parental responsibility
- check GRCs issued overseas against the [table of gender recognition systems in approved countries and territories under the gender recognition act 2004](#), to see if:
  - you can accept it
  - the customer can align the gender on their foreign passport (if they have one)
- check if the customer has a foreign passport – if they do, you must:
  - check Knowledge Base to see if the customer can align the gender on it
  - ask the customer or Foreign, Commonwealth & Development Office (FCDO) to confirm if the customer can align the gender on it
  - consider allowing more time for the customer to align the gender on their foreign passport
  - check the customer's supporting documents to confirm they have aligned their foreign passports – if they do not, you must tell the customer that we may not be able to show their preferred gender on the passport
- clarify with the customer regarding the requirement to complete a gender selection on the application if they have advised us that they do not identify in either gender and explain, if necessary, our policy on what gender must be shown
- check the customer's supporting documents confirm their identity – if they do not, you must tell the customer that we may not be able to show their preferred gender on the passport

## Gender dysphoria: deciding what to do

The interventions (actions) you carry out, may mean you need to:

- override a facial matching check
- accept the customer is exempt from our usual policy about aligning their foreign passport (because they are a dual national and the other country does not recognise gender change), meaning you can issue them with a passport without:
  - an observation
  - the customer needing to align their gender
- record your decisions in line with the gender recognition guidance
- refuse to issue a passport in the new gender if you do not have enough evidence
- not issue a passport until the customer has declared which gender they want it issuing in (for customers who do not identify in either gender)

## Gender dysphoria vulnerability indicator: specific overseas issues

Specific overseas issues related to this vulnerability include customers who live in countries:

- that do not recognise a change of gender
- where it is illegal to change gender (meaning they may be at risk of harm)

Customers in these countries will not be able to align their foreign passports in the new gender.

## Gender dysphoria: legislations

The [Equality Act 2010](#) means we have a legal duty:

- not to discriminate against customers on the grounds of gender dysphoria, when we provide our services
- not to identify (disclose intentionally or unintentionally) a customer as someone who has changed gender

The [Gender Recognition Act](#) enables transsexual people to apply to receive a Gender Recognition Certificate (GRC). A Gender Recognition Certificate is the document issued that shows that a person has satisfied the criteria for legal recognition in the acquired gender. The Act gives people with gender dysphoria legal recognition as members of the sex appropriate to their gender identity allowing them to acquire a Gender Recognition Certificate.

### Related content

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# Vulnerability: child safeguarding and welfare

This section tells HM Passport Office operational staff about the child safeguarding (protection) and child welfare vulnerability indicator.

A child may also be known as 'a minor'. In the UK and for safeguarding purposes this legal term recognises children as anyone who is under the age of 18.

For passport purposes, a child aged 16 or 17 can apply for and consent to their own passport application. It is important to remember that, regardless of this consent, in the eyes of the law they remain a child.

## Child safeguarding and welfare: when it may apply

As part of the Home Office, HM Passport Office have a legal duty to safeguard children and must act on any information (or evidence) that shows a child's welfare is (or may) be at risk, whether it is before or during the passport application process or after a passport is issued.

This vulnerability relates to the welfare risk or concern:

- of a child being (or possibly being):
  - abused or exploited
  - a victim of trafficking
  - a victim of modern slavery
- connected to a suspect overseas surrogacy case:
  - where the child is overseas for a long period of time
  - where the country permitting the surrogacy may not have the expected safeguards in place

Modern Slavery and Human Trafficking (MSHT) is a term that relates to crimes against children and adults who are forced, persuaded or deceived, for the purposes of:

- sexual exploitation
- forced labour
- committing a crime

## Child safeguarding and welfare: how we may identify it

We may:

- identify the vulnerability, if a customer (or third party):
  - submits a letter or notification that shows there are safeguarding concerns about a child

- submits a court order
- tells us during the application process
- identify the vulnerability, when we have (or get) information from other sources, for example:
  - solicitors, Social Services, foster carers, the police or another third party
  - when Social Services, a foster carer or the Foreign and Commonwealth Office (for international applications) consent to an application
- suspect the vulnerability, if:
  - the customer appears to be under pressure or there is an indication that someone pressured them into making an application
  - there is a watchlist entry that shows historic safeguarding concerns
  - there are concerns about who is consenting to the application
  - there are other signs there is a safeguarding concern during the application process (for example, suspicious behaviour at an interview, on the phone or during a visit to a public counter or when a parent discloses information about their activity)

## Child safeguarding and welfare: dealing with applications

If we identify the vulnerability, we will provide support and depending on the circumstances, may:

- prevent the issue of a passport
- cancel an existing passport

We must always find out where the child is before we decide to cancel a passport, for example they may be outside their country of residence and cancelling a passport might leave them unable to return home.

If you, the HM Passport Office staff member, identify the vulnerability during the application process, you must:

- check the documents you receive and any previous passport records, to help confirm the circumstances
- make sure any previous evidence is still valid (if there is any)
- check if the documents or verbal information you receive, meets criteria for you to take action, for example a court order detailing previous abuse. See Safeguarding: consent issues guidance
- discreetly consider any physical signs that a child may have been abused or is at risk of abuse (in cases when you are present with a child)
- refer to the warnings and matches guidance, when dealing with system and watchlist matches
- check the person applying for a passport is the same person who applied previously, for example, other parent or third party and we have appropriate consent
- check if there are previous records of court orders relating to the person, for renewal or replacement applications, applying on behalf of the customer
- provide the contact details for national (and local government) support services (if the customer asks for them)

- refer the application to the Counter Fraud team (CFT), if you have any concerns about the application

CFT will check the application to see if the risk of abuse means we need to take additional action, which may include:

- asking for additional documents (especially for international applications)
- investigation and evidence gathering with the government legal department or the Ministry of Justice (MOJ)
- investigating an existing watchlist entry or fraud file, to see if we need more information before we issue a passport
- considering if a court order means we must refuse the application, in line with the [written ministerial statement which outlines the grounds for issuing, withdrawing and refusing passports](#).
- referral to the Safeguarding team contacting Social Services or the Police to decide what to do next, if the risk of abuse has already been recorded or is currently under investigation
- contacting the FCDO for advice about overseas surrogacy cases, for example, to question whether the country has the expected safeguards in place
- contacting the Quality, Examination Support team and the Migration and Borders Group, to decide what other actions to take

## Child safeguarding and welfare: deciding what to do

The interventions (actions) you, the CFT staff member carry out, may mean you need to:

- contact the police to report your concerns (and provide them with the details)
- cancel an existing passport to prevent travel
- refuse to issue a passport, if:
  - a court order tells you to
  - there is clear evidence that a child would be at risk of abuse, if we issue them with a passport
- create a watchlist entry to prevent the issue of a future passport
- provide the contact details for national (or local government) support services

## Child safeguarding and welfare: specific overseas issues

Overseas issues related to this vulnerability might include:

- whether there is a Foreign, Commonwealth & Development Office (FCDO) presence in the country of residence and what their role is
- the risk of leaving a child who is overseas [undocumented](#) (with no passport)

## Child safeguarding and welfare: legislation

We have a legal duty to safeguard and promote a child's welfare, in line with:

- the [Children Act 1989](#)

- section 55 of the [Borders, Citizenship and Immigration Act 2009](#)

The [working together to safeguard children](#) document shows anyone in an official role that has contact with a child, what their responsibilities are.

## **Related content**

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# Vulnerability: child abduction

This section tells HM Passport Office operational staff about the child abduction vulnerability indicator.

This vulnerability relates to the welfare risk of a child being taken illegally (by force or deception) by a group (or individual) from the care of their legally appointed guardians, for example [a child who has been taken overseas by a parent or relative](#) without the consent of the other parent or court.

Someone may apply for a passport or ask us to cancel one, to help with their attempt to abduct a child. Requests for urgent passports (for example, child upgrades) can be common in abduction cases. Time and the request for certainty as to when the passport will be available are common factors connected to instances of child abduction and are the reasons why we do not permit premium counter appointments for child application.

It is important to understand that the involvement or presence of both parents in the application process does not mean that the child is not at risk. Parental abduction can occur for many reasons including, taking the child out of country:

- to avoid the intervention of Social Services
- because of [forced marriage](#)
- to expose them to Female Genital Mutilation ([FGM](#))

This vulnerability can happen before, during or after a passport application.

It is important to remember that children who are dual nationals are exposed to greater abduction risks as a passport can be obtained in the other nationality too.

## Child abduction: how we may identify it

We may:

- identify the vulnerability, if a customer (or third party):
  - sends a letter or notification that raises our concerns about an abduction
  - submits a court order
  - tells us about the concern during the application process, for example at interview
- identify the vulnerability if we have (or get) information from other sources, for example:
  - [Reunite](#)
  - the police
  - other third party, for example another government department
- suspect the vulnerability, if:
  - the customer appears to be under pressure or there is an indication that someone pressured them into making an application

- the customer or parent's behaviour at interview causes concern regarding the child's welfare
- there is a watchlist entry that shows historic abduction concerns
- there is an urgent application for a child at a public counter
- the person making an application wants to urgently upgrade it
- there is a sudden change in circumstances
- someone has falsely reported the passport as lost or stolen
- there are multiple applications for a child
- the expected authorisation and consent is missing

## Child abduction: dealing with applications

If we identify the vulnerability, we will try to provide support and depending on the circumstances, we may prevent the issue of a passport or cancel an existing passport.

If you, the HM Passport Office member of staff, identify the vulnerability during the application process, you must:

- check the documents you receive and any previous passport records, to help confirm the circumstances
- make sure any previous evidence is still valid (if there is any)
- check if the documents or verbal information you receive, meet the criteria for you to take action, for example a court order detailing the risk
- discretely consider any physical signs that a child may have been abducted or is at risk of abduction (in cases when you are present with the child)
- refer to the warnings and matches guidance, when dealing with system and watchlist matches
- check the person applying for a passport is the same person who applied previously
- consider if any report of a lost or stolen passport is false (as there may be an attempt to avoid our one passport per person policy in order to abduct a child)
- provide the contact details for local, national and international support services (for example, [Reunite](#)) if the customer asks for it
- refer the application to the Counter Fraud team (CFT) if you have any concerns about the application

CFT will check the application, to see if the risk of abduction means we need to take additional action, which may include:

- investigating a watchlist entry or fraud file, to see if we need more information before we issue a passport
- checking to see if we issued a passport to a child after a caveat watchlist entry has been put in place (CFT will consider the impacts if there is)
- considering if a court order means we need to refuse the application We must also consider whether refusal would leave the child [undocumented overseas making them vulnerable](#) in a different way. We must contact the Foreign, Commonwealth & Development Office (FCDO) to discuss the case before we make a decision to do this



- consider whether we should not comply with the court order (because doing so could make the child vulnerable through being undocumented or in another way) in this scenario you must inform the Migration and Borders Group immediately so that they can consult and take advice from the Home Office Legal department on the most appropriate next steps, investigation and evidence gathering with the government legal department or the Ministry of Justice (MOJ)
- contacting Social Services or the Police to decide what to do next, if the risk of abduction has already been recorded or is currently under investigation
- contacting the:
  - Central Authority for Child Abduction (England, Wales and Scotland) and the court and tribunal service (Northern Ireland) for advice about how to deal with the UK cases
  - FCDO for advice about how to deal with overseas cases
- contacting the Quality, Examination Support team and the Migration and Borders Group, to decide what other action to take (if you need to)

## Child abduction: deciding what to do

The interventions (actions) you, the CFT staff member, carry out may mean you need to:

- contact the police or Social Services to report your concerns (and provide them with the details)
- report any false declarations the customer made, to the police
- contact the UK port authorities to issue a notice to prevent travel
- cancel an existing passport (to prevent travel) after establishing where the child is (risk of leaving child undocumented) and considering whether the child is a dual national (cancellation might mean the child's whereabouts might not be traceable)
- refuse to issue a passport, if:
  - a court order tells you to
  - there is clear evidence that a child would be at risk of abduction, if we issue them with a passport
- follow any advice you get from the:
  - Central Authority for Child Abduction (England, Wales and Scotland)
  - court and tribunal service (Northern Ireland)
  - FCDO
- create a watchlist entry to prevent the issue of a future passport
- issue an emergency travel document (ETD) to return the child to their country of residence

## Child abduction: specific overseas issues

Specific overseas issues related to this vulnerability include:

- customers in countries which have not signed up to the [Hague convention](#), meaning the return of the child is less likely

- countries who are Hague Convention signatories are more likely to comply with a request to return the child, but this is still likely to take a long time
- countries whose legal system favours the rights of 1 parent over the other (usually on the basis of gender)

We must be careful regarding our involvement and contact with customers and any courts or officials overseas as we cannot be seen to take sides. We must contact the FCDO in the relevant country for advice on how to proceed (the FCDO will contact officials overseas for us if that is required).

We must also be sensitive to any instances where we see competing orders issued by courts of different countries and seek advice from the Quality, Examination Support team (QuEST), the Migration and Borders Group (and if directed by QuEST or the Migration and Borders Group, the FCDO).

## Child abduction: legislation

The:

- [Children Act 1989](#) means we have a legal duty to safeguard and promote a child's welfare
- [Borders, Citizenship and Immigration Act 2009](#) means the Home Office has a legal duty to safeguard and promote the welfare of children in discharging our functions in respect to:
  - Immigration
  - nationality
  - customs
  - asylum
- [working together to safeguard children](#) document shows anyone in an official role that has contact with a child, what their responsibilities are
- [Hague convention on international child abduction](#)
- [EU rules on court jurisdiction](#) and conflict of law

### Related content and guidance

[Contents](#)

# Vulnerability: parental disputes

This section tells HM Passport Office operational staff about the [parental disputes](#) vulnerability indicator.

This vulnerability relates to any child application when there appears to be a dispute (or argument) between 1 or more people who have parental responsibility for a child. It is not limited to biological or adoptive parents and includes anyone who holds a court order that gives them parental responsibility.

In the majority of cases where parents do not agree on the issuing, holding or changing of the child's details in relation to a passport application, the child is not considered vulnerable.

Where a parent raises concerns through a court order or in contact with us, we will always consider their concerns.

We must always check with the parent who has raised a concern about their safety or the safety of the child about whether the Police or Social Services have also been approached and record their response.

If the Police or Social Services have not been approached, we will need to consider whether the claims are sufficiently serious for:

- us to contact them
- encourage the parent to do so

If the Police or Social Services are already involved this must be taken into account in dealing with any related passport application.

All cases where Police or Social Services involvement has been declared must be referred to the Safeguarding team via the local Counter Fraud Team (CFT).

We must not take sides when dealing with parental disputes and will always recommend that all parties should seek an informal agreement or resolution via the family law courts. However, we must take action if we suspect someone with parental responsibility is trying to fraudulently get a passport for a child, by avoiding our:

- one passport per person policy
- authorisation and consent policy

This vulnerability is closely linked to other vulnerabilities, for example, the [child safeguarding and child welfare vulnerability](#) and [child abduction vulnerability](#).

## Parental disputes: how we may identify it

We may:

- identify the vulnerability if a customer (parent or third party):
  - sends a letter or notification that confirms there is a dispute
  - submits a court order (or multiple conflicting court orders) that show there is parental dispute
  - tells us about the parental dispute during the application process
  - tells us about it at interview or in person at the public counter
- identify the vulnerability if we have (or get) information about it from another source (for example, the police or Social Services)
- suspect the vulnerability because:
  - there is a watchlist entry that indicates a parental dispute
  - 1 parent reports a lost or stolen passport but we have received it as part of another application or the other parent confirms they have it
  - someone falsely declares a lost or stolen passport
  - we receive multiple applications at the same time, from more than 1 parent
  - someone with parental responsibility refuses to give consent

## Parental disputes: dealing with applications

If we identify the vulnerability, we may (depending on the circumstances) prevent the issue of a passport or cancel an existing one.

If you, the HM Passport Office staff member, identify the vulnerability during the application process, you must:

- check if we have the correct consent
- check the documents you receive and any previous passport records, to confirm the circumstances
- check if any previous evidence is still valid (if there is any)
- check if the documents or verbal information you receive, mean that you must take action, for example a court order
- refer to the warnings and matches guidance to deal with any system or watchlist matches
- check if the person applying is the same person who previously applied
- consider if the report of a lost or stolen passport is false (as it may be an attempt to avoid our one person per passport policy)
- check if there are multiple duplicate applications from different people with the correct authority (if there is, you must allow 28 days for them to decide which application should continue)
- refer the application to the Counter Fraud team (CFT), if you have concerns that someone has made a false declaration

## Parental disputes: deciding what to do

The interventions (actions) you, the CFT or Child Protection and Safeguarding team member of staff, carry out, may mean you need to:

- report false declarations and vulnerability concerns to the police

- cancel an existing passport (if we incorrectly issued it and after we have confirmed where the child is, so that we don't leave a child undocumented overseas)
- refuse to issue a passport, if:
  - the customer is trying to avoid our one passport per person policy
  - a parent (or third party) refused to consent to a passport
- issue the passport in the original name, if we do not get the consent from everyone with parental responsibility (for child change of names)
- create a watchlist entry to prevent the issue of a passport in the future
- withdraw an application (for example, when there is no solution or agreement to the parental dispute or when we get duplicate or contradictory court orders)

## Parental disputes: specific overseas issues

Specific overseas issues related to this vulnerability include, separate and contradictory court orders from parents in:

- the same legal jurisdiction
- different legal jurisdictions

If this happens, you must get advice from the BCSPi team (using a guidance query to the Quality, Examination Support team) about the case. The policy team will contact the Government Legal Department (GLD) on your behalf and seek instruction. When GLD have provided you with advice, you must allow both parties 28 days to reach an agreement (before you withdraw the application).

## Parental disputes: legislation

We have a legal duty to safeguard (protect) and promote a child's welfare, in line with:

- the [Children Act 1989](#)
- section 55 of the [Borders, Citizenship and Immigration Act 2009](#)

The [working together to safeguard children](#) document shows anyone in an official role that has contact with a child, what their responsibilities are.

### Related content and guidance

[Contents](#)

# Vulnerability: victims of identity theft

This section tells HM Passport Office operational staff about the victims of identity theft vulnerability indicator.

This vulnerability relates to the effect of identity theft on the genuine holder of the identity. Customers who have been the victim of identity theft, may have been subject to an intervention (check) because of the theft, for example an interview.

Identity theft is when someone steals another person's personal details. Identity fraud is when the stolen details are used to access services such as benefits, mortgages, and passports. In most cases, the person stealing the details will use them to commit identity fraud.

The genuine holder of the identity may be unaware that their identity has been stolen and is being used by someone else.

Criminals will also try to use the identity of deceased people.

The reasons why people commit (or try commit) identity fraud, can be linked to criminality including:

- international terrorism (masking travel to evade detection at borders)
- people trafficking
- exploiting children or other vulnerable people
- illegal immigration
- drug related crime
- benefit fraud and access to public services that the individual is not entitled to
- fraudulent access to private sector services and businesses

If a customer tells us they suspect (or know) someone has stolen their details and is using their identity, we must act on it, regardless of whether they tell us before, during or after the passport application process.

When we become aware that an identity has been compromised (stolen or abused) then we must refer the application to the Counter Fraud team (CFT) for further investigation.

## Victims of identity theft: how we may identify it

We may:

- identify the vulnerability, if the genuine holder of the identity (or third party):
  - sends a letter or notification that gives us details about the theft
  - submits documents showing someone has stolen their identity (for example, letters from their bank or from a government department)
  - tells us about the theft (or their suspicions about it) during the application process, including at interview

- identify the vulnerability, if we have (or get) intelligence from the police, from another government department or an agency overseas
- suspect the vulnerability, if:
  - the outcome of a watchlist check shows the identity has been stolen
  - there is already a watchlist entry telling us the identity has been stolen
  - the passport photos or signatures on the current and previous passport application look different
  - we find (through our own checks) that a passport already exists during an application for a first passport
  - our system checks shows the customer already holds a previous passport that they did not declare on their application

## Identity theft: dealing with applications

If we identify the vulnerability, we will try to provide support to the genuine holder of the identity. Depending on the circumstances, we may prevent the issue of a passport or cancel an existing passport that we issued to an imposter.

If you, the HM Passport Office member of staff, identify the vulnerability during the application process, you must:

- check the documents you receive and any previous passport records to confirm the circumstances
- check the signature on the previous passport record (if there is one) to see if it matches the signature on the current application (if you have concerns, you must refer the application to the Counter Fraud Team (CFT))
- check the outcome of any facial matching checks and see if you can confirm the customer's identity from the previous photos (if you need to, you must contact the referee to confirm the customer's identity)
- refer to the warnings and matches guidance, when dealing with system and watchlist matches
- refer to the Lost Stolen and Recovered (LSR) passport guidance, if all of the following apply:
  - there is a previous passport match on passport records
  - it's a first time adult passport application
  - the customer's identity is not in doubt

If you, the examiner, can confirm the customer's identity from your checks and have no concerns, you must:

1. Progress the customer's passport application in line with current guidance).
2. Email them an [identity fraud leaflet](#) from your teams shared mailbox.

If you cannot confirm the customer's identity and you believe the identity is in doubt, you must refer the application for investigation to the relevant CFT. If during their investigation CFT discover more than one person is using the identity, they will investigate to determine who the genuine holder of the identity is and will take action in line with guidance.

## Identity theft: legislation

The Counter Fraud team (CFT) will investigate cases of fraud and will work with the appropriate authorities to prosecute imposters, under the relevant legislation.

### Related content and guidance

[Contents](#)



# Vulnerability: civil and political unrest

This section tells HM Passport Office operational staff about the civil and political unrest vulnerability indicator.

This vulnerability relates to customers who are in a country, or customers who have close links to a country, where there is period of civil or political unrest. This may be a period of disruption affecting the usual social order in a country (for example, strikes or protests) regardless of whether these are peaceful.

The situation in the country may prevent the UK from providing representation or offering repatriation (voluntary or involuntary transfer back to home country). For example, if the British High Commission (BHC) or Visa Application Centre (VAC) close.

Civil and political unrest can sometimes be declared a crisis event and you must always check whether any crisis specific guidance is in place and follow that.

The situation in a country might prevent the customer from:

- applying for a passport
- getting, sending or collecting documents
- attending an interview
- providing a voluntary DNA sample
- contacting us

## Civil and political unrest: how we may identify it

We may:

- identify the vulnerability because a customer or third party (for example, the Foreign, Commonwealth & Development Office (FCDO)):
  - sends us a letter explaining what is happening in the country and how it is affecting the customers' ability to apply for a passport
  - tell us about it during the application process
- suspect the vulnerability because:
  - the FCDO formally tell us about the situation
  - we know that the FCDO are not represented in the country where the unrest is occurring
  - we know that there are no Visa Application Centre (VAC) facilities in the country
  - the situation in the country is being reported in the news
  - Sopra Steria Ltd have noted that some of the customer's documents are missing

## Civil and political unrest: dealing with applications

If we identify the vulnerability, we will try to provide support to the customer in line with the current FCDO advice or any agreed Emergency Assistance Measures (EAM's).

You, the HM Passport Office staff member, must always check whether any crisis specific guidance is in place, for example a specific bulletin has been issued, and ensure that you follow that.

If you identify the vulnerability during the application process, you must:

- review each application on a case by case basis and in line with any published guidance issued by HM Passport Office in line with FCDO advice
- check if the correspondence or documents you receive meet any published crisis related exceptions, by checking:
  - country specific guidance in Knowledge Base
  - bulletins or specific crisis guidance that we issued at the time
  - directly with the FCDO (or other government department)
- consider on a case by case basis, if you need to waive any of our usual processes, for example extend the amount of time for the customer to return documentation to us, (you may need advice from the Quality, Examination Support team (QuEst) and the Migration and Borders Group using a guidance query, to decide what action to take)
- contact QuEst about applying discretion to allow postal or in person applications from a country that we do not normally
- refer the application (through a guidance query) to QuEst and Migration and Borders Group, if the British High Commission (BHC) or Visa Application Centre (VAC) is closed due to the crisis (so they can work with FCDO to consider other options)
- examine the application using 'a balance of probabilities' (BOP) approach and consider asking for alternative documents (this approach is about decision making that must occur when standard application requirements cannot be met by the customer, meaning that you must decide based on the evidence that can be produced and where the evidence provided by the customer shows the facts or event probably occurred. The person making the BOP decision must be more than 50% sure the evidence supports the event occurring)
- consider interviewing the customer to confirm their identity, their claim to nationality and entitlement and to also confirm that there are no grounds for refusal or any safeguarding concerns
- contact the FCDO to set up alternative arrangements for interviews or voluntary DNA testing (if you need to)
- contact the FCDO to consider issuing an Emergency Travel Documents (ETD) to help with travel (in exceptional cases and only if we can confirm the customer's nationality, entitlement and identity)
- ask the customer to provide additional evidence (in cases where we cannot establish the claim)
- follow any guidance that we publish about the crisis

## Civil and political unrest: deciding what to do

The interventions (actions) you, the HM Passport Office staff member, carry out mean you need to:

- waive our usual process (only on a case by case basis and with advice from BICSPI who will if required discuss the case with the FCDO)
- allow additional time for the customer to provide information (for example, a voluntary DNA test or return documents)
- allow interviews to take place in a neighbouring country
- issue a passport in line with:
  - crisis specific guidance
  - BICSPI and FCDO instructions
- issue an ETD
- send the passport to an alternative address or change the collection method

## Civil and political unrest: specific overseas issues

Specific overseas issues related to this vulnerability include:

- customers who have lost their passport (or whose passport has expired) and the FCDO withdraw consular assistance from the country they are in (meaning the customer cannot travel to a neighbouring country to apply for their passport)

### **Related content and guidance**

[Contents](#)

# Vulnerability: overseas and UK crisis situations

This section tells HM Passport Office operational staff about the overseas and UK crisis situations vulnerability considerations.

This vulnerability relates to customers who urgently need help because of a crisis or emergency situation in the UK or overseas. A crisis may happen because of:

- [civil or political unrest in a country](#)
- a man-made or natural disaster (for example, a terrorist attack, disease pandemic or earthquake)

The Foreign, Commonwealth & Development Office (FCDO) will consider events overseas and in the UK, it is the Home Office who will decide what response is required and whether to declare a crisis response.

In crisis situations, a ministerial decision will normally be made about repatriating (voluntary or involuntary transfer to home country) affected British citizens who are overseas.

HM Passport Office will publish crisis specific guidance on what staff are expected to do once the decision has been made to declare a crisis overseas or in the UK and when any Emergency Assistance Measures (EAMS) have been agreed.

This guidance will cover the whole process and will also provide specific guidance on any decision regarding fees and fee waivers.

Customers may need a passport:

- to allow them to be repatriated
- to replace one that has been destroyed in a crisis (to allow them to access services or public funds)

The crisis situation may:

- prevent the customer from:
  - getting, sending or collecting documents
  - submitting an application
  - attending an interview
  - providing a DNA sample
  - contacting us
- mean the customer is evacuated to a safer country, without:
  - their documents
  - a way of getting their documents

## Overseas and UK crisis situations: how we may identify it

We may:

- identify the vulnerability, if a customer or third party (for example, the Foreign, Commonwealth & Development Office (FCDO)):
  - send us a letter explaining what is happening in country in crisis and how it's affecting a customers' ability to apply for a passport
  - tell us about it during the application process
- suspect the vulnerability because:
  - the FCDO formally tell us about a crisis
  - the situation in the country is being reported in the news
  - Sopra Steria Limited have noted that some of the documents are missing

## Overseas and UK crisis situations: dealing with applications

If we identify the vulnerability, we will try to support the customer. If you, the HM Passport office staff member, identify the vulnerability during the application process, you must:

- check if any correspondence or documents you receive, meet any published exceptions relating to the crisis, by checking:
  - country specific guidance in Knowledge Base
  - bulletins or specific crisis guidance that we issued
  - check with the FCDO or other government department directly
- consider any requests to waive our usual process (including the fee) on a case by case basis (you must send a guidance query to refer the application to the Quality, Examination Support team (QuEST) and the Migration and Borders Group, to confirm what action you need to take)
- contact QuEST to ask if you can accept a postal or in person application from a country that we do not usually offer this service to
- contact QuEST and the Migration and Borders Group, if the British High Commission (BHC) or Visa Application Centre (VAC) is closed due to the crisis (so they can contact the FCDO about other options available)
- examine the application using a balance of probabilities approach (this approach is about decision making that must occur when standard application requirements cannot be met by the customer, meaning that you must decide based on the evidence that can be produced and where the evidence provided by the customer shows the facts or event probably occurred. The person making the Balance of Probabilities (BOP) decision must be more satisfied than not that the person is who they claim to be and that the claimed events happened and ask for alternative documents
- consider interviewing the customer to confirm their identity
- contact the FCDO to set up alternative arrangements for interviews or voluntary DNA testing (if they are needed)
- check with the FCDO to consider issuing an Emergency Travel Document (ETD) to help with travel (only in exceptional cases and when we can confirm the customer's nationality, entitlement and identity)

- ask the customer:
  - for additional evidence
  - to travel to another country so we can carry out further checks (in cases when we cannot confirm the identity, nationality or their entitlement))
- follow crisis specific guidance (if we have issued it)

## Overseas and UK crisis situations: deciding what to do

The interventions (actions) you carry out, may mean you need to:

- waive our usual application process (only on a case by case basis and with advice from the Migration and Borders Group who, where needed, will discuss the case with the FCDO)
- give the customer more time to complete the application process (for example, to complete a voluntary DNA test)
- allow interviews to take place in a neighbouring country
- issue a passport in line with:
  - crisis specific guidance
  - the Migration and Borders Group and FCDO instructions
- temporarily reduce our passport loss and theft reporting rules (in agreement with any HM Government emergency measures declaration)
- arrange to issue a British passport to a British national in a foreign country where there is no consular assistance available (to help with their repatriation)
- contact the FCDO to arrange the issue of an ETD
- send the customer's passport to an alternative address or change collection method

## Overseas and UK crisis situations: specific overseas issues

Specific overseas issues related to this vulnerability include:

- customers who have lost their passport (or whose passport has expired) and the FCDO withdraw consular assistance from the country they are in (meaning they cannot travel to a neighbouring country to apply for another passport)

### Related content and guidance

[Contents](#)

# Vulnerability: undocumented customers overseas

This section tells HM Passport Office operational staff about the undocumented customers overseas with no access to consular assistance vulnerability consideration.

Some people may find themselves in a foreign country without a passport and where they have no access to consular assistance to support their travel or identity needs. In some countries there is a requirement for people to hold a passport or have a valid visa. If they do not, they are considered 'undocumented' because they cannot prove their identity. Authorities in some of these countries may fine or imprison someone who is undocumented.

## Undocumented customers overseas: when it may apply

This vulnerability relates to customers who are in a country where HM Passport Office cannot accept an application from and there is limited or [no consular assistance](#) available.

If there is no consular assistance in the country, a customer will not be able to travel to another country for help.

## Undocumented customers overseas: how we may identify it

We may:

- identify the vulnerability if a customer or third party (for example, the Foreign, Commonwealth & Development Office (FCDO)):
  - send us a letter explaining what is happening in the country and how it's affecting the customer's ability to apply for a passport
  - tell us about it during the application process
- suspect the vulnerability, if:
  - the FCDO formally tell us about a customer

## Undocumented customers overseas: dealing with applications

When we identify this vulnerability, we will try to provide support to the customer.

If you, the HM Passport Office staff member, identify the vulnerability during the application process, you must:



- tell the customer to contact the FCDO to discuss their situation (the FCDO can sometimes arrange to issue travel documents via other nations embassies in those countries where we are not represented)
- tell the customer to seek advice on what to do in the country they are in, for example, contact the police
- check if the correspondence or documents you receive meet any published exceptions, by checking:
  - the country specific guidance in the Knowledge Base
  - the bulletins or crisis specific guidance (if we have issued any)
  - directly with the FCDO (or other government department) via the agreed route
- consider any requests to waive our usual processes (including the fee) on a case by case basis (you must send a guidance query to the Quality and Examination Support team (QuEST) to ask advice from the Migration and Borders Group, to decide what to do)
- contact the FCDO to set up alternative arrangements, for example, arranging for interviews or voluntary DNA testing to take place in another country (if a customer needs an interview or a voluntary DNA test)
- check the signature on the previous passport record (if there is one) to see if it matches the one on the current application (if you have any concerns, you must refer the application to the Counter Fraud team (CFT))
- contact the referee if there is one to help confirm the customer's identity and carry out any other checks that you need to
- interview the customer to confirm their identity
- ask for alternative documents and examine the application using a balance of probabilities approach (this approach is about decision making that must occur when standard application requirements cannot be met by the customer, meaning that you must decide based on the evidence that can be produced and where the evidence provided by the customer shows the facts or event probably occurred. The person making the BOP decision must be more than 50% sure the evidence supports the event occurring)
- check with the FCDO to see if they are considering issuing the customer with an Emergency Travel Documents (ETD) (only in exceptional cases to help with travel and if we can confirm the customer's nationality, entitlement and identity)
- follow any specific instructions that we, the FCDO or the policy teams have issued

## Undocumented customers overseas: deciding what to do

The interventions (actions) that you carry out, may mean you need to:

- waive our usual processes (only on a case by case basis with advice from the Migration and Borders Group or the FCDO)
- allow our processes to take place in a neighbouring country (for example, interviews or voluntary DNA testing)
- send the customer's passport to an alternative address or change collection method



## Undocumented customers overseas: specific overseas issues

Specific overseas issues related to this vulnerability include:

- customers who are unable to travel to or stay in another country (in these cases, we may have no option other than to refuse the passport application)

### **Related content**

[Contents](#)

# Vulnerability: lack of documents or no postal address

This section tells HM Passport Office operational staff about the lack of documents or no postal address vulnerability indicator.

This vulnerability relates to customers who are unable to give us the documents we need or access our services, because:

- their birth may not have been registered
- they are homeless (for example, they do not have a permanent address and we are unable to establish their residential footprint)
- they cannot get documents from a country due to political unrest or because of a crisis situation
- they cannot provide evidence of their identity, claim to British nationality or entitlement to the passport (for example, if they are not in contact with their family and have difficulty getting the documents we normally accept)
- they are a child who is looked after by a local authority and cannot provide evidence of their claim to British nationality, or do not have an automatic claim to British nationality

This list is not exhaustive, and you must consider the customer's circumstances and decide if this vulnerability applies to them or if they can give us alternative documents (see: supporting documents not available and balance of probabilities guidance).

## Lack of documents or postal address: how we may identify it

We may:

- identify the vulnerability if the customer (or third party):
  - submits a letter telling us that their birth has not been registered
  - formally tell us in writing (for example, a letter from the General Register Office (GRO) confirming there is no trace of a customer's birth)
  - submits a letter explaining the customer does not have a permanent address (for example, we get a letter from a charity explaining that a customer is homeless)
  - gives us a letter telling us they have made every effort to get the documents we need but they cannot get their parents or grandparents documents (or evidence of their parent or grandparent's change of name) because they are not in contact with them
  - tells us during the application process
- suspect the vulnerability, if:

- the Foreign, Commonwealth & Development Office (FCDO) or another government department, for example, the Department of Work and Pensions (DWP) formally tell us about the situation
- some of the customer's documents are missing (either because Sopra Steria Limited tell us or we find out during the application process)
- a Lifetime Event Verification (LEV) check shows there is no information for the customer (for child applications only)
- the address on the application shows the customer is homeless or is for a homeless shelter or charity

## Lack of documents or postal address: dealing with applications

If we identify the vulnerability, we will try to provide support to the customer.

If you, the HM Passport Office member of staff, identify the vulnerability during the application process, you must:

- contact the customer to confirm if they have alternative certificate details (in cases when there are no results from a LEV check)
- ask the customer for alternative documents (if they have any) and review them in line with the supporting documents not available and balance of probabilities guidance
- check if you can accept the correspondence or documents you receive, as an alternative document
- check if the customer is homeless (in cases when they do not provide a residential address) and confirm where to send the passport (for example, a letter from a third party confirming the customer is homeless and that they will accept delivery of the passport and any supporting documents)
- make a decision using a balance of probabilities approach and ask for a:
  - letter from the UK GRO (or correct overseas authority) confirming a birth has not been registered in the customer's details. The GRO will only issue these letters for customers over the age of 18 years old.
  - statutory declaration from an elder relative that confirms why the customer's birth has not been registered
  - contemporaneous evidence (evidence from the time that the event took place) to support the birth (for example, birth records, hospital records, ante natal records, and photos)
- contact the referee to confirm the customer's identity and carry out any other checks that you need to
- interview the customer to confirm their identity
- refer the application to a Counter Fraud Team (CFT), if you have concerns with the customer's identity or address
- case note your decisions, actions and outcomes

## Lack of documents or postal address: deciding what to do

The interventions (actions) you, the HM Passport office member of staff carry out, may mean you need to:

- follow our:
  - searches and checks guidance
  - supporting documents not available guidance
  - balance of probability guidance
- waive our usual application process (only on a case by case basis and with advice from the Migration and Borders Group or the FCDO)
- refer the customer to UK Visa and Immigration (UKVI) to register or naturalise (in cases when we cannot confirm the customer's nationality). If the customer is a looked after child, you must advise they will be exempt from the registration fee if they meet the criteria. They must:
  - be a child who is [looked-after by a local authority in the UK](#) or a child outside the UK under similar arrangements
  - be under 18 at the time of the application to register
  - follow the guidance on [UKVI](#) and submit the [evidence requested](#)
- issue the customer with a passport, in line with any case specific guidance or instructions from the Passport Policy Team or FCDO
- post the customer's passport and documents to an alternative address or give them to a third party (only when you have the customer's permission)
- case note the application in line with the how to record case notes and passport notes guidance

## Lack of documents or postal address: specific overseas issues

Specific overseas issues related to this vulnerability include:

- consideration of how best to support the customer if born overseas
- directing the customer to contact the FCDO to establish what support they might be able to offer in terms of providing contacts who might be able to assist

### Related content and guidance

[Contents](#)

# Vulnerability: confiscated passports

This section tells HM Passport Office operational staff about the confiscated passports vulnerability consideration.

This vulnerability relates to customers in the UK and overseas who have had their passports confiscated. It may have been taken:

- legally, by an authority (for example, by foreign law enforcement officials or by the legal action of a health provider)
- illegally (for example, by hotel staff because of non-payment for a service or by a family member who is in dispute with the customer)

The confiscation of a passport could be harmful to the customer, for example, they may

- become undocumented (if they are overseas and need a passport to confirm identity, residence and right to work)
- not be able to travel to get help
- be at risk of:
  - having their identity stolen
  - extortion (obtaining something, especially money, through force or threat)

## Confiscated passports: how we may identify it

We may:

- identify the vulnerability if a customer (or third party):
  - submits a letter telling us their passport has been confiscated
  - submits a loss report that shows the details of the lost passport
  - tells us during the application process
- suspect the vulnerability because:
  - the Foreign, Commonwealth & Development Office (FCDO) formally tell us about the situation
  - a solicitor is involved
  - a local mental health authority is involved
- already be aware about the vulnerability, if we have got:
  - a letter or notification from the police (or a foreign law enforcement agency) about a confiscated passport
  - a court order that references a confiscated passport (for example, a court order issued under the [Mental Capacity Act 2005](#))

## Confiscated passports: dealing with applications

When we identify this vulnerability, we will try to provide support to the customer and depending on the circumstances, we may consider cancelling the passport.

If you, the HM Passport Office member of staff, identify the vulnerability during the application process, you must:

- check the customer's circumstances and compare it to the circumstances that we have been given (for example, by a court or the police)
- check the previous passport records (if there are any) to confirm the customer's evidence or ask for additional evidence
- check if the documents you receive showing the customer's circumstances mean we can apply an exception to our usual processes
- send a guidance query to ask the Quality and Examination Support team (QuEST) and the Migration and Borders Group for advice about if the passport was legally or illegally confiscated)
- check with the FCDO, other government department, police or other enforcement authority about why they confiscated the passport and what action has been taken, for example, the FCDO may have contacted the holder to ask for the passport back
- refer the Counter Fraud team (CFT) if the passport has been confiscated in the UK or overseas by:
  - the courts
  - the police
  - other law enforcement agencies
- check with QuEST and the Migration and Borders Group, if you have doubts about if you can issue a new passport
- ask for a report of the loss or theft of a passport (if you need to)

## Confiscated passports: deciding what to do

The interventions (actions) you, the CFT member of staff, carry out, may mean you need to:

- contact the UK (or overseas) authority who have confiscated the passport illegally, to tell them:
  - the passport remains the property of HM Government
  - third parties cannot hold a passport in bond (keep the passport until monies owed are paid) unless it is for law enforcement purposes or the prevention of crime
  - they must return it to us
- send the customer a letter to tell them:
  - the passport remains the property of HM Government
  - third parties cannot hold a passport in bond (unless it is for law enforcement purposes or the prevention of crime)
  - to forward the letter to the authority illegally holding the passport
- cancel the existing passport (in cases when a third party confiscated it illegally and have not returned it)
- destroy the current passport, when a third party illegally confiscated it but returned it to us (we cannot return it to the customer as it may have been tampered with)
- issue a new passport directly to the customer, as long as:

- QuEST, the Migration and Borders Group or the FCDO (if the customer is overseas) agree you can
- you have the correct consent (for child applications)
- refuse to issue a new passport and create a watchlist entry to stop the customer from being issued with a future passport (if the passport was legally confiscated, for example, as part of criminal proceedings)

## Confiscated passports: specific overseas issues

Specific overseas issues related to this vulnerability include consideration of whether the customer is overseas and faces greater risk because of being undocumented.

### Related content and guidance

[Contents](#)

# Vulnerability: abuse and exploitation

This section tells HM Passport Office operational staff about the abuse and exploitation vulnerability consideration.

This vulnerability relates to customers who are at risk (or who are already the subject) of abuse or exploitation.

Exploitation is the act of treating an individual unfairly, to benefit from them.

This vulnerability may apply, and we must act when we confirm a customer is:

- suffering from forced marriage
- suffering from female genital mutilation (FGM)
- a victim (or possible victim) of modern slavery and human trafficking
- suffering from domestic or other forms of abuse (including threats to harm parent or child that are linked to providing or seeking consent)

All staff working with suspected or actual victims of abuse and exploitation need to be aware of the “one chance rule”. If the victim does not receive the appropriate support or advice, that one chance might be wasted.

In your consideration around interventions, you must remember you may only have one opportunity to speak to a victim (or potential victim) of abuse and exploitation and therefore may only have one chance to save a life.

## About forced marriage

A [forced marriage](#) is a crime and a form of abuse where one or both people do not (or in cases of people with learning disabilities or reduced capacity, cannot) consent to the marriage as they are pressurised, or abuse is used, to force them to do so.

The UK recognises forced marriage as a form of domestic or child abuse and a serious abuse of human rights. It can affect men, women and children from many communities and cultures.

The pressure put on someone to marry against their will, may be:

- physical (for example, threats, physical or sexual violence)
- emotional or psychological (for example, making someone feel as if they are bringing shame on their family)
- financial abuse (for example, taking someone’s wages)

There are sometimes cultural reasons or financial motives that drive parents or third parties to try to force their children or other people to marry. ‘Honour’ based abuse is a term used to describe a variety of offences adopted by a family or community to coerce or punish individuals for undermining what is perceived to be the correct code



of behaviour. 'Honour' based abuse can be a trigger for forced marriage when a family or community try to force a person into marriage to control behaviour and protect perceptions of 'honour'.

Although women and girls are the main victims of forced marriage, men may also be at heightened risk of forced marriage and 'honour' based abuse if they identify as LGBT+ (lesbian, gay, bisexual, transgender and those whose sexuality and gender identity is not based on a traditional gender binary).

## About female genital mutilation

[FGM](#) is the deliberate procedure to cut, injure or change female genitalia when there is no medical reason to. It's also known as:

- female circumcision
- cutting

FGM is illegal in the UK and is a form of child abuse.

FGM is usually carried out on young girls between infancy and the age of 15, most commonly before they start puberty. It's very painful and can:

- seriously harm the health of girls and women
- cause long-term problems with sex, childbirth and mental health

## About modern slavery and human trafficking

[Modern slavery and human trafficking \(MSHT\)](#) is the term used for the trade of people (usually women and children) and does not always involve the movement of the person from one place to another.

MSHT includes:

- forced labour
- sexual slavery
- commercial or sexual exploitation
- providing someone for:
  - a forced marriage
  - the extraction of organs or tissues
  - for surrogacy

MSHT is a crime due to the:

- violation of the victim's rights of movement, through force
- the commercial exploitation and the abuse victims may suffer

## About domestic and other abuse

Domestic abuse is violence (or other abuse) made by one person against another, in a domestic setting (for example, a marriage or while living together). It can:

- take place:
  - in heterosexual or same-sex relationships
  - between former spouses or partners
- involve violence against:
  - children
  - parents
  - the elderly

Like other abuse types, it:

- may take a number of forms, for example:
  - physical abuse
  - verbal abuse
  - emotional abuse
  - economic abuse
  - religious abuse
  - reproductive and sexual abuse
- can range from subtle, manipulative forms of abuse, to marital rape and violent physical abuse, for example:
  - choking
  - beating
  - FGM
  - acid throwing that results in disfigurement or death

## Abuse and exploitation: how we may identify it

We may:

- identify the vulnerability before, during or after an application from a customer (or third party), when they:
  - submit a letter telling us about the abuse or exploitation
  - submit a court order that mentions the abuse
  - submit a [forced marriage protection order](#)
  - submit a [slavery and trafficking prevention or risk order](#)
  - tell us during an identity interview
  - tell us during the application process
  - mention the abuse or exploitation when they report a lost or stolen passport
- suspect the vulnerability, because:
  - the customer appears under duress when they contact us (for example, their behaviour at an interview causes concern or they appear to have been forced into making an application)
  - the Foreign, Commonwealth & Development Office (FCDO) formally tell us about the abuse or exploitation

- the abuse is recorded in a previous watchlist entry or as part of a previous passport application
- when we consider the passport application as a whole and we suspect the customer is being abused or threatened with abuse (for example, if it becomes clear a third party is controlling their passport)
- there is an urgency connected to the process, for example the customer (or third party) requests a quick service
- already be aware of the vulnerability because the police told us not to issue a passport to a customer

## Abuse and exploitation: dealing with applications

If we identify the vulnerability, we will try to provide support and may (depending on the circumstances) decide not to issue a passport or cancel an existing one.

If you, the HM Passport Office member of staff, identify the vulnerability during the application process, you must:

- find out where the customer is, when you speak to them or meet with them in person
- discreetly consider any physical signs the customer may have been abused or is at risk of abuse (if you are meeting them in person, for example, at an interview or visit the public counter)
- check if the documents or verbal information you receive mean you need to take action
- refer to the warnings and matches guidance, to resolve any system matches or watchlist matches
- refer the application through the Counter Fraud team (CFT) to the Child Protection and Safeguarding team (CPST) to consider the customer's circumstances
- contact the correct agency (for example, the forced marriage unit, FGM unit, MSHT unit or the policy team) to decide what action to take (if the risk of exploitation or abuse has already been recorded or it's currently under investigation)
- contact the Quality, Examination Support team (QuEST) and the Migration and Borders Group, (using a guidance query form) for advice about what to do
- ask for a loss or theft report (if you need to)
- consider temporarily waiving our passport loss and theft reporting rules (for example, an abusive parent who was issued with the previous passport does not need to make a report). This would occur only on a case by case basis and following referral to QuEST and in agreement with any instructions from the Migration and Borders Group
- provide the contact details for national (and local government) support services
- confirm where to send the customer's passport or documents to or where the customer should collect them from (for example, when a letter from a refuge confirms the circumstances and that they will accept delivery)

## Abuse and exploitation: deciding what to do

The interventions (actions) you, the CFT or CPST member of staff, carry out, may mean you need to:

- contact the police to report your concerns (and give them details of your concerns)
- contact the Forced Marriage Unit (FMU) if the concern relates to forced marriage and give them details of your concerns (including any information you may have identified about a dual national status of the potential victim)
- waive our usual application processes (only on a case by case basis and in agreement with any instructions from the Migration and Borders Group)
- cancel an existing passport (to prevent travel)
- refuse to issue a passport, if:
  - a court order tells us to
  - there is evidence the customer would be at risk of abuse or exploitation, if we issue them with a passport
- create a watchlist entry to prevent the future issue of a passport
- post the passport to an alternative safe address (for example, a refuge or third party that the customer or FCDO has agreed)

## Abuse and exploitation: specific overseas issues

There are no specific overseas issues related to this vulnerability.

## Abuse and exploitation: legislation

[The Domestic Violence, Crime and Victims Act 2004](#) concentrates on legal protection and assistance to victims of crime, particularly domestic violence.

[The Forced Marriage \(Civil Protection\) Act 2007](#)

[The right to choose: Government guidance on forced marriage](#)

[The Female Genital Mutilation Act 2003](#)

[The Modern Slavery Act 2005](#) was introduced to make provision about slavery, servitude, exploitation and forced or compulsory labour and about human trafficking, including provision for the protection of victims.

[The Human Trafficking and Exploitation \(Criminal Justice and Support for Victims\) Act \(Northern Ireland\) 2015](#) also refers.

### Related content and guidance

[Contents](#)

# Vulnerability: suicide or threats of self-harm

This section tells HM Passport Office operational staff about the threat of suicide or threats of self-harm vulnerability considerations.

This vulnerability may apply when it relates to customers who tell us they plan to end their life or self-harm. It may happen:

- because of a decision we made during the passport application process (for example, to cancel a passport or refuse it)
- the customer is asked for information that causes them distress
- when someone who is not a passport customer but wants to talk to us

Staff who are concerned about customers who have threatened to hurt themselves or others, must follow instructions (including the 6 point plan) contained in the Suicide and Self-harm; Supporting vulnerable customers guidance.

## Suicide or threats of self-harm: how we may identify it

We may find out about the vulnerability when a customer (or third party) tells us about it.

## Suicide or threat of self-harm: dealing with applications

If we identify the vulnerability, we will try to provide support.

If you, the HM Passport Office staff member, identify the vulnerability during the application process, you must:

- listen to the concern raised or acknowledge (if concern raised in writing)
- offer options to resolve the concern if there are any unexplored options available
- not make a promise that we can do something if we cannot
- ask for help from a colleague or manager if you feel the situation is escalating
- assess from the context provided whether the threat made is likely to be acted upon
- encourage the caller to contact someone who is able to provide specialist help
- get the details of where the customer is, what their plans are and what actions they have already taken (if you are speaking to them)
- provide the contact details of [helplines and online services and resources that help individuals who have suicidal thoughts](#)
- call the police or the Foreign, Commonwealth & Development Office (FCDO) (if the customer is overseas) and give them the details of the situation and the urgency

- contact Social Services, a social worker, solicitor or person with parental responsibility to tell them the customer has made a threat (if we have their details)
- contact the Quality, Examination Support team and the Migration and Borders Group (using a guidance query form) for advice on what action to take
- add a record that the person has made a threat

If you are personally affected by the vulnerability, you must ask for support by:

- making your colleagues, manager, for example your operational team leader (OTL) aware of the situation
- checking what resources are available through your local welfare representatives, for example, a mental health first aider on site

## Suicide or threats of self-harm: specific overseas issues

If the customer is overseas then you must contact the FCDO with details of the situation and urgency.

### Related content

[Contents](#)

# Vulnerability: compassionate circumstances

This section tells HM Passport Office operational staff about the compassionate circumstances vulnerability consideration.

This vulnerability relates to customers whose application does not meet the criteria for a premium service, but need to travel urgently, as:

- they are ill and need treatment overseas
- their partner (or close relative) is ill and they need to travel to be with them
- their partner (or close relative) has died overseas
- they are a terminally or critically ill child and a charitable organisation (for example, Make-A-Wish foundation) has arranged travel to give them a positive end of life experience

You must be aware that there are special considerations in respect of children and urgent travel. Our [child safeguarding responsibilities](#) mean that we do not offer a 4 hour premium service at the public counter.

## Compassionate circumstances: how we may identify it

We may:

- identify the vulnerability before or during an application, when a customer or third party (for example, medical or healthcare professional):
  - submits a letter telling us about the treatment, illness or death
  - submits a letter confirming medical treatment has been booked overseas
  - tells us about the situation during the application process
- suspect the vulnerability, if:
  - the Foreign, Commonwealth & Development Office (FCDO) formally tell us
  - we receive other information that suggests the vulnerability exists, for example a letter from a care worker
- already be aware that the vulnerability exists, if we have received:
  - a letter from a registered charity about the customer (for example, a letter from the Make-A-Wish foundation)

## Compassionate circumstances: dealing with applications

If we identify the vulnerability, we will try to provide support.

If you, the HM Passport Office member of staff, identify the vulnerability during the application process, you must:

- check if the documents or verbal information you receive are genuine (can be verified) and meet the criteria for you to take action

- check if you can deal with the application in the usual postal or Tiered Application Service turnaround timescale (in order to meet the customers travel needs)
- check if the customer meets the 'exemption from interview First Time Adult (FTA)' criteria and if you can issue a restricted validity (RV) passport
- check if the FCDO will consider issuing an emergency travel document (if the customer is overseas)
- tell the customer if they do not meet the criteria for us to apply an exception

## Compassionate circumstances: deciding what to do

The interventions (actions) you do, may mean you need to:

- temporarily waive our interview process when you issue a RV passport (you must arrange an interview when the customer sends an application to renew the restricted validity passport)
- send a guidance query to the Quality and Examination Support team, to:
  - review it
  - refer it to Passport Policy to consider if the customer can have an overlap passport for an exceptional reason
- issue a RV passport when you know we will be able to apply our usual processes and we are confident that usual application requirements will be met in the future
- refuse to apply an exception if the evidence of compassionate circumstances is unsatisfactory

## Compassionate circumstances: specific overseas issues

There are no specific overseas issues related to this vulnerability.

### Related content

[Contents](#)