



Home Office

# Names: aligning names on foreign documents

Version 28.0

His Majesty's Passport Office guidance on how to deal with passport applications when the name a customer applies in, does not match the name on their foreign documents

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# About: Names: aligning names on foreign documents

This guidance tells His Majesty's Passport Office operational staff how to deal with customers, when the name on their passport application does not match the name on their foreign documents. It tells staff:

- what the customer must do (before we issue them with a passport)
- when we will consider issuing a passport using the name on a passport application (even if it does not match the name on the customer's foreign document)

This guidance makes references to foreign documents and 'foreign passports'. For the purpose of this guidance, both 'foreign documents' and 'foreign passports' refers to non-British passports and national identity cards (for example, German citizens who have personal identity cards).

## 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 **28.0**
- published for Home Office staff on **11 October 2024**

## Changes from last version of this guidance

This guidance has been updated to:

- tell DAP examiners how to process paper applications where the customer declares a foreign passport
- tell DAP (Digital Application Processing) examiners to use letter 344 to ask a customer for official evidence which shows they cannot align the name on their foreign document
- remove reference to contacting Stakeholder management team for Belarus and Russia
- remove instructions to transfer applications to AMS (Application Management System)

- tell examiners to check previous applications for evidence of name alignment issues before contacting the customer

### **Related content**

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# Aligning a name on a foreign document

This section tells His Majesty's Passport Office operational staff about our 'use of names' policy and why we ask customers to align their name during a passport application when a customer applies for a passport in a name that does not match their name on their foreign document.

Our policy about aligning names on foreign documents, follows the Home Office policy on the use and change of name.

Customers applying for a British passport, must:

- tell us about their other valid (or expired) passports (for dual nationals, this will be their foreign passport (see declaring foreign passports)
- use the name they use for all official purposes (the name they use for going about their daily lives)
- make sure their official documents match the name they want to be known by, including their [foreign documents](#)
- make sure any spelling errors on their documents have been corrected. If the name cannot be corrected they must enclose a full explanation of the difference

We must carefully check the customer's name on their foreign documents match the passport application.

If a customer has not declared another passport when making their application, see declaring another passport when a customer makes an application.

## Why we ask customers to align their name

We will not issue the customer a passport if we cannot confirm that they have one name they use for all official purposes. For example, when the customer applies for a passport and they:

- provide a national identity card in a different name to the one on their passport application
- declare a foreign or other British passport (for example, a British National Overseas passport) in a different name to the one on their passport application

This is because, we:

- must protect the security of the British passport (by preventing, disrupting, and identifying those who change their name to commit crime or avoid detection)
- cannot accept documents that allow a customer to apply for a foreign passport, travel document or identity document in a different name

Customers may send us a passport application in a name that does not match their foreign documents. Unless it meets [one of our exceptions](#), we expect customers to change the name on their foreign document, so it matches the name on their passport application, before they send their application to us.

You, the examiner, must establish which name the customer uses and make sure that all documents are aligned to show that name. These documents include any:

- foreign passports
- travel documents
- identity documents

This may mean a customer needs to complete a formal process for the change of name to be accepted in the other country, for example, if the name can only be changed in court. We understand this may cause the customer additional effort and cost, so our exceptions try to reduce the impact on the customer. The exceptions consider:

- the legal, cultural, social, and technical restrictions of the country (where the document is from) that may stop the customer from changing their name
- if a customer gives us official evidence, that they:
  - cannot renew their foreign passport or document in their previous name, any further passport would be issued in the same name as their British passport
  - are already in the process of aligning the name on their foreign passport or document
- if it's reasonable to ask customers to change their name on a foreign document

Most customers (whose names do not align) have dual citizenship (also known as dual nationality) and either have:

- a foreign passport (or can get one)
- multiple British passports

The UK allows dual citizenship, but other countries may not. It is up to the customer to decide how they want to proceed with their passport application. We will not tell them what to do about gaining, maintaining, or giving up another country's citizenship.

## Customers who want to use their foreign passport for travel

It's up to customers to decide whether to use their foreign passport for travel. If they do not have a British passport and want to use their foreign passport for travel, they may need a certificate of entitlement to prove they have a Right of Abode in the UK.

Customers can find out more about [certificates of entitlement on GOV.UK](#), including:

- who can apply
- how to apply

- how much they cost

## **Related content**

[Contents](#)

# When a foreign document is in a different name

This section tells His Majesty's Passport Office operational staff how to deal with passport applications when a customer applies for a passport in a name that does not match their name on their foreign document.

Before you contact a customer who has given us a foreign document in a different name to the one on their passport application, you must first check if the difference is due to an added or removed hyphen, space, or apostrophe.

If the name difference is not because of an added or removed hyphen, space, or apostrophe, you must check for information which may be relevant for the country that issued the document. (See: Name difference: checking Knowledge Base)

If you, the examiner, receive contact by email from any embassy or foreign authority, you must not respond to it. You must send the email to the International liaison team for them to respond on your behalf.

## Name difference: hyphen, space, or apostrophe

You must check if the difference is because the customer added or removed:

- a hyphen between their names (for example, the customer's surname on their foreign passport is Jones-Smith and the surname on their passport application is Jones Smith)
- a space between their names (for example, the customer's forename on their foreign passport is JohnPierre and the forename on their passport application is John Pierre)
- an apostrophe between their names (for example, the customer's forename on their foreign passport is John'Pierre and the forename on their application is John Pierre)

This is because we will not ask the customer to align their name when all the following apply:

- the only difference between the name is because the customer added or removed a hyphen, space, or apostrophe between their names
- the order of the name has not changed
- a surname has not become a part of a forename
- a forename has not become part of a surname

If the only difference between the names relates to a hyphen, space, or apostrophe we can accept, you must:

1. Accept the name.

2. Add a case note to show all the actions and decisions you have made with reasons (see Names: name related case notes for what you must include in the case note).
3. Issue a passport with full validity with an observation to show the customer's name in their foreign passport, you must amend observation code OBTZ:
  - o if the holder's forenames and surname are clearly recognisable to show:

THE HOLDER HAS A [name of country] [passport, travel document or identity document], NUMBER [passport, travel document or identity document number], ISSUED ON [date], IN THE NAME OF [name on that passport, travel document or identity document]. THIS [passport, travel document or identity document] IS DUE TO EXPIRE / EXPIRED] ON [date]

- o if you need to clearly show which are the customer's forenames and surname, to show:

THE HOLDER HAS A [name of country] [passport, travel document or identity document], NUMBER [passport, travel document or identity document number] IN THE FORENAMES OF [forename] AND THE SURNAME OF [surname], ISSUED ON [date]. THIS [passport, travel document or identity document] [IS DUE TO EXPIRE / EXPIRED] ON [date].

You must not add an observation if the foreign document is in a different gender to the new British passport.

If a customer tells you that adding an observation that shows they have a foreign passport or document will cause them problems, you must:

1. Check Knowledge Base to find out if an observation will cause travel problems or put the customer at risk.
2. Refer to when observations may cause travel problems, or put a customer at risk.

## **Name difference: initials**

If the name is different due to the use of an initial instead of the full name, for example, John P White, then the customer must be asked to align the passport.

If the initial(s) have been used due to the character limit not having enough space for the full name to be shown, you must accept this. You must case note the action taken and add observation code OBTZ.

THE HOLDER HAS A [name of country] [passport, travel document or identity document], NUMBER [passport, travel document or identity document number], ISSUED ON [date], IN THE NAME OF [name on that passport, travel document or identity document]. THIS [passport, travel document or identity document] IS DUE TO EXPIRE / EXPIRED] ON [date].

You must not add an observation if the foreign document is in a different gender to the new British passport.

## Name difference: spelling errors

If the name is different due to claimed spelling errors on the documents, you must fully investigate the name difference.

You must ask the customer to officially amend the name on the documents or provide an explanation of the difference before continuing with the application. You must follow confirming identity guidance when dealing with spelling errors on documents.

## Name difference: checking Knowledge Base

If the name difference does not relate to a hyphen, space, apostrophe or initials you must check Knowledge Base to see if the country (where the document is from), has any:

- legal, cultural, social, or technical restrictions, relating to:
  - name changes
  - gender changes
  - dual citizenship
  - the number of characters a foreign authority can use for the customer's name, and if it's less than what we can put in the British passport
- cultural naming conventions (rules that say how a name must be shown) that may explain why the name is different (see Names: how to show uncommon names in passports)

When you check Knowledge Base, you must consider, if:

- a customer can change the name on their foreign document and if they cannot, what evidence you need from them that shows they cannot
- a customer can only change their name on a foreign document by travelling to the country where it's from
- a customer can change the name on a foreign document without travelling to the country where the document is from, for example:
  - if a third party (such as friend, relative or solicitor) who lives in the country where the document is from, can change the customer's name on their behalf
  - if a customer can change their name by contacting the relevant UK based embassy, consular office, or High Commission
  - a customer who holds both an internal and international passport for another country, can change their residency status which allows them to change the name from the UK
- the country where a document is from does not allow dual citizenship (it's up to customers to decide what to do about their citizenship and must check with the consulate or High Commission about the effect of giving it up)

## When Knowledge Base shows cultural naming conventions

If Knowledge Base shows the country where the customer's foreign document is from has naming conventions, you must consider if this is the reason why their name is different.

You must check Knowledge Base to find out if the country where the document is from allows the customer to align their name. You may need to check previous applications to see if there is any information or case notes which would explain why the name is different.

For example, a previous application submitted for a child will show parents details and therefore explain why an adult customer who also holds a Japan passport may have a Japan passport in their mother's surname and a British passport in their father's surname.

If the country allows the customer to align their name, you must continue to ask the customer to change their name on their foreign document or provide evidence that it either can not be done or the process of aligning their foreign document would cause them problems (see administrative fairness test).

You must refer to Names: how to show uncommon names in passports, if Knowledge Base shows:

- the country does not allow the customer to align their name
- the name change will fall outside of the naming convention
- there are no naming conventions in the country, but the customer provides official evidence that explains the difference in the spelling of their name is because of a naming convention

## When Knowledge Base shows restrictions on aligning names

You must refer to the exceptions guidance, if Knowledge Base shows the country where the document is from, has legal, cultural, social or technical restrictions, relating to:

- name changes
- gender changes
- dual citizenship
- the number of characters a foreign authority can use for the customer's name, and if it's less than what we can put in the British passport

## When Knowledge Base shows there are no restrictions on aligning names

If Knowledge Base shows the country does not have legal, cultural, social or technical restrictions, there are no naming conventions or the difference does not relate to a hyphen, space or apostrophe, you must tell the customer:

- you have identified a difference between the name on their foreign document and their passport application
- the Home Office has a 'use and change of name guidance' policy
- to confirm the name, they use for all official purposes and to give you evidence (if you do not already have it)
- they must change the name on their foreign document, so it matches the name on their passport application (which is the name they use for all official purposes)
- you cannot issue them a British passport until they do, or they can give you evidence from the foreign authority that shows they cannot change the name on their foreign document

If you are dealing with the application on AMS (Application Management System), you must take a copy of the foreign document and return the original to the customer by secure delivery (so they can change the name on it). If you are dealing with a copy of the document, you must tell the customer to get the name on their original foreign document updated and continue to deal with the application on AMS.

If you are dealing with the application on Digital Application Processing (DAP) you must continue to deal with the application on DAP and follow the Returning documents on live applications guidance

If the customer has provided a copy of the original document on a DAP application, you must tell the customer to get the name on their original foreign document updated and continue to deal with the application on DAP.

If processing on DAP or AMS, you must:

1. Add a case note to show all the actions and decisions you made (see Names: name related case notes for what you must include in the case note).
2. Wait for the customer to send the updated foreign document to you. You may accept a colour photocopy of the document (by post or email) for any renewal applications. For all other application types you can accept a colour photocopy only where you have seen the original already. You must ask for the original if you have concerns with it. If the customer does not respond or you lose contact with them, withdraw the application (see passport application withdrawals).

If the customer tells you it is too difficult for them to change their name, you must refer to exceptions: administrative fairness test.

When you get the updated foreign document (or a suitable colour photocopy of it that you do not have concerns with), you must check if the customer's name matches the name on their passport application. If it:

- does, and you have no other concerns with the application, you must:
  - issue the customer a passport (in line with current guidance)
  - add a case note to show all the actions and decisions you have made, (see Names: name related case notes for what you must include in the case note)
- does not, you must check Knowledge Base to find out if any local naming conventions mean the name is presented differently, for example, where a Latin spelling changes the spelling of a name. If a naming convention shows this, you must:
  - accept the foreign document
  - issue the customer a passport (in line with current guidance), with an observation to explain the difference in spelling

If the customer's name does not match the name on their passport application and you cannot find any details of local naming conventions on Knowledge Base, you must:

- not issue the customer a British passport
- return the foreign document to the customer and ask them to change the name or provide evidence that shows why they cannot (see exceptions to our use of names in passports policy)

If the customer:

- does not respond, you must withdraw the application (in line with the passport applications withdrawal guidance)
- refuses to align their name, you must refer to if the customer refuses to change their name on a foreign document
- gives you evidence that they cannot change their name, you must check:
  - the evidence is from an official source (for example, a government website or issuing authority)
  - if the reason meets one of our exceptions to our use of names in passports policy
- tells you it is too difficult for them to change their name, you must refer to exceptions: administrative fairness test

## If a customer gives information not shown in Knowledge Base

If we do not hold information on Knowledge Base to confirm that a customer cannot change their name on a foreign passport, you must ask the customer to give us evidence from an official source to confirm this.

The official source can include:

- an official government website

- a credible website, for example, the:
  - United Nations International Children’s Emergency Fund site
  - European Asylum Support Office site
- an email from an official authority (for example, the Embassy or Consulate of the country of issue, that clearly shows they sent it)
- a letter from an official authority (for example, the embassy or Consulate of the country that issued the document)

If the information is not already in Knowledge Base, you must:

1. Email the document verification team with the information that needs updating.
2. Include a copy of the evidence the customer gave you.

The Guidance team will update Knowledge Base with the new information.

### **Related content**

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# If the customer refuses to change their name

This section tells His Majesty's Passport Office operational staff about when a customer applies for a passport in a name that does not match their name on their foreign passport, travel document or identity document and they refuse to change their name to align the documents.

If the customer refuses to change their name on their foreign passport, travel document or identity document, you must consider if the name on their foreign document is the name they use for all official purposes.

If the name on the foreign passport, travel document or identity document is not the name used for all official purposes, you must:

- not tell the customer to change their current name used on the passport application, to match their foreign document (for example, by deed poll)
- consider if the application meets any of our exceptions, or the criteria of the administrative fairness test

If the customer does not meet one of our exceptions or our administrative fairness test criteria, you must:

1. Tell the customer:
  - you cannot issue them a passport, until they either change the name on their foreign document, or register the change of name with the relevant authorities to match the name on their passport application
  - that dual citizenship is allowed in the UK, and they must check with the other country's official authorities to find out about that country's laws on dual nationality
2. If you are dealing with the application on:
  - AMS, pigeonhole the application in your team while you wait for them to decide what to do
  - DAP, send the customer a letter telling them what they need to do
3. Add a case note to show all the actions and decisions you have made (see Names: name related case notes for what you must include in the case note).

## Customer refuses to change name: if you lose contact

If the customer does not respond after you asked them to change their name, you must withdraw their application and archive the supporting documents (in line with the withdrawal of passport applications guidance).

If the customer has another type of British passport or additional passport and you have it (as they sent it with their application), you must send it to the archives on AMS, or long term storage on DAP.

If the customer has another type of British passport or additional passport and they still have it, you must raise a guidance query and ask the Quality and Examination Support team (QuEST) what to do about the other British passport. QuEST will decide what to do on a case by case basis and may contact the Passport Policy team for advice.

If the customer later asks us to return their old passport, you must refer to Customer refuses to change name: when we keep their old passport and they ask for it back.

## Customer refuses to change name: if you are still in contact

The customer may refuse to align the name in their foreign passport. How you deal with the situation will depend on whether the application is for their first British passport or renewal or replacement of an existing one.

### Customer refuses to change name: first time application

If you are still in contact with a customer who refuses to change their name and it's a first-time passport application, you must:

1. Discuss any concerns with your operational team leader (OTL), who may need to seek advice from QuEST. If you agree there is evidence of fraud concerns, and to arrange for the customer's details to be added to the watchlist, you must:
  - o refer the case to Enhanced Application Checking (EAC), if you are processing on AMS
  - o complete additional checks (in line with the guidance) and select **Refer for investigation**, if you are processing on DAP
2. Withdraw the application (in line with the withdrawal of passport applications guidance).
3. Return the customer's supporting documents.
4. Add a case note to show all the actions and decisions you have made.

### Customer refuses to change name: renewal and replacement applications

If you are still in contact with a customer who refuses to change their name and it's a renewal or replacement application, you must check if the name on their old passport matches the name on their foreign passport.

If the name in the customer's old passport matches the name on their foreign document but not the name on the passport application (for example, because the customer changed their name since we issued their old passport) you must:

1. Discuss any concerns with your OTL, who may need to seek advice from QuEST – if you agree there is evidence of fraud concerns, and to arrange for the customer's details to be added to the watchlist if required, you must:
  - o refer the case to EAC if you are processing on AMS
  - o complete additional checks (in line with the guidance) and select **Refer for investigation**, if you are processing on DAP

2. Withdraw the application (in line with withdrawal of passport applications and DAP name alignment task guidance).
3. Not physically cancel the old passport.
4. Return the old passport to the customer (in renewal applications).
5. Return any other supporting documents to the customer.
6. Add a case note to show all the actions and decisions you have made.

If it's a renewal application and the name on the customer's old passport does not match the name on their foreign document, you must:

1. Refer to customer refuses to change name: when we keep their old passport and they ask for it back, if the customer asks us to return their old passport.
2. Add a case note to show all the actions and decisions you have made.
3. Withdraw the application (and deal with the DAP name alignment task if you are working in DAP).
4. Not cancel the old passport and retain it in storage (using ARD, if you are working on DAP) or send it to archive (if you are working on AMS).
5. Return any other supporting documents to the customer.
6. Raise a guidance query if the customer has other British passports, to ask QuEST what you should do with it – when you do, you must include:
  - what type of British passport it is (including if it's an additional passport)
  - whether the customer sent it with their application
  - any differences with the customer's name between all their British passports and foreign documents
  - if there are any visas in it (if you know)
  - if the customer is using it (if you know)
7. Discuss the case with your OTL, who may need to seek advice from QuEST about arranging to add the customer's details to the watchlist (if you have fraud concerns).

## When a customer asks for their old passport back

If a customer refuses to change their name on the foreign document to match the name on their passport application, we will have withdrawn their application and kept the old passport, if:

- we lost contact with them during the examination process
- their name on the old passport did not match the name on the foreign document

If the customer asks us to return their old passport, you must:

- return it, if the:
  - name on the old passport matches the name on the foreign document
  - customer provides evidence that they are in the process of changing the name on their foreign document to match the name on their old passport

If the name in the customer's old passport does not match the name on the foreign document, you must raise a guidance query with QuEST.

QuEst may liaise with the Passport Policy team and will let you know if you can return the passport.

**Related content**

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# Aligning names for adopted children

This section tells His Majesty's Passport Office operational staff how to deal with a passport application where an adopted child's name does not match their name on their foreign document.

You must deal with applications for adopted children, in line with the adoptions guidance. If an adopted child's name on a passport application does not match the name on their foreign document, we:

- must check Knowledge Base, to find out if there are any reasons why the adoptive parents can not align the child's name on the foreign document
- expect the adoptive parents to change the child's name on the foreign document, to match the name on the passport application
- will not accept that the child's name is different because the adoptive parents want the child to maintain a cultural link with their country of birth, as a reason

In most cases, the parent can change the child's name on the foreign document by contacting the:

- correct UK based embassy
- High Commission
- consular office

You must not:

- encourage adoptive parents to add an observation that allows us to issue a child's passport in a name that does not match their name on a foreign passport (so as to provide a break with the old name)
- consider adding observations without evidence from the parents that shows they cannot change the name on the foreign document

## Adding observations to passports for adopted children

Before you add an observation to a passport for an adopted child to show they have a passport in a different name, you must consider if:

- the adoption record is sealed (kept private) which the:
  - General Registrar Office (GRO) can confirm, if it's a UK adoption (see adoptions guidance, for details of the GRO for England and Wales, Scotland and Northern Ireland)
  - Department of Education can confirm, if the customer adopts a child from another country (see adoptions guidance, for details of the Department for Education)
- there are safeguarding (child protection) concerns

## Adoption record is sealed or you have safeguarding concerns

If the adoption record is sealed (or you are unsure if it's sealed) or you have safeguarding concerns, the Quality, Examination Support team (QuEST) will decide if you can add an observation to show a child has a foreign passport in a different name (taking into account the parental rights of the birth and adoptive parents).

This is because we do not usually add an observation that shows an adopted child's previous name so we can protect their safety, in line with:

- the [disclosure of information in relation to a person's adoption](#) section of the [Adoption and Children Act 2002](#)
- section 15 of the [Children, Schools and Families Act 2010](#)
- overseas adoption laws (if it's on overseas adoption)

You must raise a guidance query and include all supporting evidence, if either the:

- adoption record is sealed
- adoptive parents agree that we can add an observation to the child's passport, that shows the name on their foreign passport (unless their name has changed, and the courts have noted it as 'the name to be known as' in the adoption agreement)

## Adoption record is not sealed and no safeguarding concerns

You may add an observation to an adopted child's passport to show they have a foreign passport in a different name, when all of the following apply:

- the adoption record is not sealed
- you do not have safeguarding concerns
- the reason the child cannot align the name meets one of our exceptions or you decided the customer does not need to align the passport in line with the administrative fairness test

### Related content

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# Exceptions to our 'use of names in passports policy'

This section tells His Majesty's Passport Office operational staff about the exceptional occasions when we will issue a passport in the name on the passport application, even though it does not match the name on a customer's foreign passport, travel document or identity document. It also explains when they must add an observation to show the customer has a foreign passport or document in a different name.

Customers must apply for a passport using the name they use for all official purposes and must match the name on their foreign documents. Although we expect the customer to change the name on their foreign document to match the name on their passport application, some customers may not be able to.

There are exceptions when we will issue a passport using a customer's name on their passport application, even though it's different to the name on their foreign passport or document. We will consider:

- the legal, cultural, social and technical restrictions of other countries that stop customers from changing the name on their foreign document
- if the customer cannot renew their foreign passport in their old name (Knowledge Base will confirm if a foreign authority will provide this evidence)
- if the customer's foreign passport is lost or stolen
- if the customer does not wish to renew their expired foreign passport, or replace a missing foreign passport
- if the customer is already in the process of aligning the name on their foreign passport
- if there is no reasonable way for a customer to change their name on a foreign document

If you are dealing with an application where a customer is unable to start the process of aligning their name due to an ongoing crisis situation, you must consider any exceptional measures agreed.

## Exceptions: legal, cultural, social and technical

Customers may not be able to change the name on their foreign document to meet our 'use of names in passports policy' due to the legal, cultural, social and technical restrictions of the country where the document is from.

In most cases, the customer will have dual citizenship (also known as dual nationality) and either have:

- a foreign passport
- multiple British passports

The legal, cultural, social and technical restrictions that stop the customer from changing their name on the foreign document are when, the:

- law in the country (where the document is from) does not allow a change of name or only allows a partial change of name (see when the law in the country where the document is from, does not allow a change of name or only allows a partial change of name)
- country (where the document is from) does not allow dual citizenship (see when the country where the document is from, does not allow dual citizenship)
- customer can only change the name by travelling to the country (where the document is from) but they would be placed at a high level of risk, if they did (see when the customer has to travel to the country where the document is from to change their name on it, but would be at risk if they did)
- customer has changed their name because they have changed gender and the law in the country (where the document is from) does not allow or recognise a change of gender (see when the law in the country where the document is from, does not allow or recognise a change of gender)
- foreign authority that issued the document used a shortened version of the customer's name, because it was too long to fit on the foreign document (see [foreign issuing authority could not fit customers full name on the passport](#))
- foreign authority that issued the document will not issue a new document to show the name change until we have issued a British passport in the customer's new name

As long as Knowledge Base or official evidence (for example, from an official government website or issuing authority) shows a customer meets an exception, we will issue them a passport, using the name on their application, even though it is different to their foreign document.

We add observations to British passports when a customer cannot change the name on their foreign passport, to provide a direct link to the names (unless the difference in the name is because the customer has changed gender). This includes if a customer is unable to change the name on their foreign document until we have issued a British passport showing their new name. We will issue the passport with an observation in this scenario, but we expect the customer to take steps to align their name on the foreign documents before their next passport replacement.

You, the examiner, must always check Knowledge Base before adding an observation to a customer's passport.

It's up to the customer to tell us during the application process if an observation about their foreign passport will cause them problems. However, we have the right to add observations to help confirm their identity.

## Country does not allow a change of name

We will issue a passport in the customer's name on their passport application and add an observation to the British passport, if:

- Knowledge Base or official evidence from the customer (for example, an official document from an embassy, consulate or High Commission) shows the law in the country (where the document is from) does not allow a change of name or only allows a partial change of name
- there are no other concerns with the application

The information may also be shown on an official government website. We will accept this as evidence, as long as it clearly confirms the customer cannot change the name because of the law in the country where the document is from.

You must:

1. Tell the customer you will issue them a passport with an observation to show they have a foreign passport in another name.
2. Add an observation in the passport to show the customer's name in their foreign passport or document.
3. Amend observation code OBTZ:
  - if the holder's forenames and surname are clearly recognisable to show:

THE HOLDER HAS A [name of country passport, travel document or identity document], NUMBER [passport, travel document or identity document number], ISSUED ON [date], IN THE NAME OF [name on that passport, travel document or identity document]. THIS [passport, travel document or identity document] IS DUE TO EXPIRE / EXPIRED ON [date]

- if you need to clearly show which are the customer's forenames name and surname, to show:

THE HOLDER HAS A [country] [passport, travel document or identity document], NUMBER [passport, travel document or identity document number] IN THE FORENAMES OF [forename] AND THE SURNAME OF [surname], ISSUED ON [date]. THIS [passport, travel document or identity document] IS DUE TO EXPIRE / EXPIRED ON [date]

4. Add a case note to show all the actions and decisions you have made (see Names: name related case notes for what you must include in the case note).
5. Make sure any evidence the customer gave you is permanently scanned on the system (see scanning supporting documents).
6. Issue the passport.

We will only issue a passport without an observation, when:

- the customer provides evidence that they have changed the name on their foreign document (to match the name on the passport application)
- they send us a fully completed passport application, photos and fee
- their foreign document is in a different gender than the new British passport

If a customer tells you that adding an observation that shows they have a foreign passport or document will cause them problems, you must refer to when observations may cause travel problems, or put a customer at risk.

## Country does not allow dual citizenship

The constitution or legislation of some countries deliberately stops their citizens from holding the citizenship (also known as nationality) of another country. In most cases, you can find this information in the Knowledge Base.

You must not tell a customer to give up another country's citizenship or cancel their foreign passport, as they must decide themselves whether to tell an overseas authority about their British citizenship. Before they do, they must check with the consulate or High Commission about the effect of giving up the other country's citizenship.

If the customer tells you they will give up the other country's citizenship and cancel their foreign document, you must tell them:

- it's their decision about what to do and they must check with the consulate or High Commission about the effect of cancelling their citizenship
- they must give you official evidence that shows they gave up (or lost) the other country's citizenship and the foreign authority has cancelled their foreign passport

If the original foreign document is held in the DHU, you must use ARD (Application Receive Domain) to return the original document to the customer by secure delivery, then follow the steps below.

On DAP or AMS, you must:

1. Make a copy of the original foreign document and return it to the customer by secure delivery if you have it and you are working on AMS. (If you have a photocopy this does not apply).
2. Write to the customer using letter 344 if you are working on DAP (335 if you are processing on AMS) to tell them they must give you official evidence.
3. Wait for the customer to respond. If you do not get a response, withdraw the application (see withdrawal of passport applications guidance).
4. Check the evidence using Knowledge Base (when you get it) as there may be different types of evidence you can accept, depending on the country.
5. Check the document is scanned onto the system as a permanent record (see scanning supporting documents).
6. Add a case note to show all the actions and decisions you have made (see Names: name related case notes for what you must include in the case note).
7. Issue the customer a passport (in line with current guidance).

If the customer decides they do not want to tell the overseas authority about their British citizenship, they must change their name on the foreign document to match the name on their passport application, in line with this guidance.

## Customer has to travel to the country but will be at risk

In most cases, customers can change their name on a foreign document, by contacting the:

- relevant UK based embassy
- High Commission
- consular offices

If Knowledge Base shows the customer must go to the country where the document is from so they can change their name on the document and no other exceptions apply, you must tell them, to:

- attend the country where the document is from, to change their name on the document
- confirm in writing with evidence, why they cannot travel to the country to change their name, if they tell you they cannot travel to the country to change their name

While we try to reduce the impact travelling has on a customer, it is outside of our control, as we must protect the security standards of the British passport.

If a customer tells you that travelling to the country where the document is from will put them at risk, you must check the country's [Foreign, Commonwealth & Development Office \(FCDO\) website](#), for:

- travel related advice
- general security advice

## FCDO advice shows there is a risk of travelling

If Foreign Commonwealth & Development Office (FCDO) advice shows there is a risk of travelling, we will consider issuing the customer a passport, with:

- restricted validity (RV) using the name the customer applied in (if FCDO advice confirms the risk of travelling is likely to be short term)
- full validity, using the name the customer applied in (if the FCDO advice confirms the risk of travelling is likely to be long term or it does not show how long the risk will last)

We cannot list every situation where the risk of travelling is likely to be short term. However, an example may be when there has been an earthquake and FCDO advice is to avoid travel in the short term.

The Quality, Examination Support team (QuEST) will consider if you need to issue an RV or fully valid passport. You must:

1. Raise a guidance query and include all supporting evidence with your query.

2. Put the application on hold (on DAP) or pigeonhole the application (on AMS), while you wait for a response.

QuEST will review the evidence and may contact the FCDO for advice. If QuEST confirms you can issue the customer an RV (or fully valid passport) and there are no other concerns with the customer's application, you must:

1. Add a case note to show all the actions and decisions you have made (see Names: name related case notes for what you must include in the case note).
2. Add observation code OBTZ to the passport, to show the customer's name in their foreign passport or document, you must amend the observation code:
  - o if the holder's forenames and surname are clearly recognisable to:

THE HOLDER HAS A [name of country] [passport, travel document or identity document], NUMBER [passport, travel document or identity document number], ISSUED ON [date], IN THE NAME OF [name on that passport]. THIS [passport, travel document or identity document] IS DUE TO EXPIRE / EXPIRED ON [date]

- o if you need to clearly show which are the customer's forenames name and surname, to:

THE HOLDER HAS A [country] [passport, travel document or identity document], NUMBER [passport, travel document or identity document number] IN THE FORENAMES OF [forename] AND THE SURNAME OF [surname], ISSUED ON [date]. THIS [passport, travel document or identity document] IS DUE TO EXPIRE / EXPIRED ON [date]

3. Add observation code OBTU to show you have issued an RV passport (if you are issuing an RV passport).
4. Issue an RV or fully valid passport, depending on what QuEST tells you to do.

We will only issue a passport, without an observation, when:

- the customer provides evidence that they have changed the name on their foreign document, so it matches the name on their passport application
- they send us a fully completed passport application, photos and fee
- the foreign document is in a different gender than the new British passport

If a customer tells you that adding an observation that shows they have a foreign passport or document will cause them problems, you must:

1. Check Knowledge Base to find out if an observation will cause travel problems or put the customer at risk.
2. Refer to when observations may cause travel problems, or put a customer at risk.

## **FCDO advice shows there is no risk of travelling**

If Foreign Commonwealth & Development Office (FCDO) advice shows there is no risk of travelling, you must refer to exceptions: administrative fairness test guidance.

## Customer has previously been granted asylum or refugee status

Customers granted asylum or refugee status in the UK may be at risk if we ask them to align the name on their foreign passport with the name on their British passport application. You must check if they will be at risk if they contacted the foreign authority to align the documents.

If the customer or information in their application indicates they were previously granted asylum or refugee status, you must check UK Visa and Immigration (UKVI) systems to:

- confirm the customer was granted asylum or refugee status
- check the reason they were granted asylum or refugee status

There are many reasons why a person may seek asylum or refugee status and not all of these will put them at risk if they contact the authorities to change their passport.

The customer may have been granted asylum or refugee status for protection from the state (or bodies associated with the state), and this could mean they may still be at risk if they contacted those authorities. For example, because that government is still in power. If the customer may still be at risk you must:

- not ask the customer to align the foreign passport, travel document or identity card
- issue the British passport in their new name
- include an observation referring to the foreign document unless:
  - the customer tells you an observation may cause them problems)
  - it is in a different gender than the new British passport.

You must ask the customer to align the name on their foreign document if they were previously granted asylum or refugee status, but it does not appear they would be at risk if they contact the authorities. For example, they will probably not be put at risk by contacting the authorities if:

- they claimed protection from a family member
- they claimed protection from groups in their society
- the situation they fled from no longer exists

You, must raise a guidance query to QuESt if:

- UKVI systems do not:
  - confirm the customer was granted asylum or refugee status
  - show the reason for the asylum or refugee status
- you ask for the document to be aligned and the customer feels they would still be at risk

QuESt will advise you if the customer needs to provide further evidence and what name you can issue the passport in.

## Country does not allow or recognise a change of gender

We expect customers who change their name because they have changed gender, to change the name on their foreign document to match the name on their passport application. However, we will issue a passport using their name on the application, as long as:

- Knowledge Base (or acceptable evidence from the customer) shows that the country where the document is from, does not allow or recognise changes to gender

Before you apply this exception, you must consider the passport application as a whole and make sure you are satisfied with the evidence the customer gave you (in line with the gender guidance).

If you are satisfied with the evidence, you must:

1. Add a case note to show all the actions and decisions you have made (see Names: name related case notes for what you must include in the case note).
2. Issue the passport (if you have no other concerns with the application).
3. Not enter details of a foreign passport as an observation, in the customer's new British passport, unless it is in the same gender as their new British passport. This is because disclosing an identity in a previous gender, breaches the [Gender Reassignment Legislation](#) and the [Adoption Act](#).

If you are not satisfied with the evidence, you must raise a guidance query with QuESt and include all supporting evidence.

## Technical restrictions mean full name is not on the passport

If it appears the name in the foreign passport is different because it has been shortened, you must:

- check Knowledge Base to see if there is information that shows the country where the foreign passport is from, has a character limit less than ours
- ask the customer for official evidence (for example, from an embassy, government authority, consulate or High Commission) that shows the name has been shortened as it was too long to fit on the foreign passport (if Knowledge Base does not show it)

As long as the name has been shortened because it was too long to fit on the foreign passport, and you have official evidence to show it (from Knowledge Base or the customer) you must:

1. Add a case note to show all the actions and decisions you have made with reasons (see Names: name related case notes for what you must include in the case note).
2. Check the document is scanned onto the system as a permanent record (see scanning supporting documents).
3. Issue a passport with full validity with an observation to show the customer's name in their foreign passport or document. You must amend observation code OBTZ:
  - if the holder's forenames and surname are clearly recognisable to show:

THE HOLDER HAS A [name of country] [passport, travel document or identity document], NUMBER [passport, travel document or identity document number], ISSUED ON [date], IN THE NAME OF [name on that passport]. THIS [passport, travel document or identity document] IS DUE TO EXPIRE / EXPIRED ON [date]

- if you need to clearly show which are the customer's forenames name and surname, to show:

THE HOLDER HAS A [country] [passport, travel document or identity document], NUMBER [passport, travel document or identity document number] IN THE FORENAMES OF [forename] AND THE SURNAME OF [surname], ISSUED ON [date]. THIS [passport, travel document or identity document] IS DUE TO EXPIRE / EXPIRED ON [date]

We will only issue a passport without an observation, when:

- the customer provides evidence that they have changed the name on their foreign document (to match the name on the passport application)
- the customer sends us a fully completed passport application, photos and fee
- the customer's foreign document is in a different gender than the new British passport

If a customer tells you that adding an observation that shows they have a foreign passport or document will cause them problems, you must:

1. Check Knowledge Base to find out if an observation will cause travel problems or put the customer at risk.
2. Refer to when observations may cause travel problems, or put a customer at risk.

## Exceptions: customer cannot renew passport or document in old name

We will issue a British passport, using the name on the passport application if the customer gives us official evidence (for example, from an embassy, government authority, consulate or High Commission), that shows they:

- are not able to renew their passport in their old name

- if they did renew their foreign passport, it would be in the same name shown on the British passport application

On either AMS or DAP, you the examiner:

1. Must check the evidence the customer gave you, to make sure it's from an official authority (for example, a foreign passport office) that shows the customer:
  - cannot renew their foreign passport in their old name
  - can only renew their foreign passport using the name shown on their British passport application
2. Check the document is scanned onto the system as a permanent record (see scanning supporting documents).
3. Add a case note to show all the actions and decisions you made, with reasons (see Names: name related case notes for what you must include in the case note).
4. Issue a passport with full validity with an observation to show the customer's name in their foreign passport. You must amend observation code OBTZ:
  - if the holder's forenames and surname are clearly recognisable to show:

THE HOLDER HAS A [name of country] [passport, travel document or identity document], NUMBER [passport, travel document, or identity document number], ISSUED ON [date], IN THE NAME OF [name on that passport, travel document or identity document]. THIS [passport, travel document or identity document] IS DUE TO EXPIRE / EXPIRED ON [date]

- if you need to clearly show which are the customer's forenames name and surname, to show:

THE HOLDER HAS A [country] [passport, travel document or identity document], NUMBER [passport, travel document or identity document number] IN THE FORENAMES OF [forename] AND THE SURNAME OF [surname], ISSUED ON [date]. THIS [passport, travel document or identity document] IS DUE TO EXPIRE / EXPIRED ON [date]

We will only issue a passport without an observation when the foreign document is in a different gender than the new British passport.

If the customer cannot give you the evidence, you must tell them you cannot issue them a passport until they align the name on the foreign passport (unless it meets any of our other exceptions).

## Exceptions: customer's foreign passport is lost or stolen

If the customer tells us their foreign passport is lost or stolen, you must ask them to provide evidence from the issuing foreign authority that shows what name:

- was on the lost or stolen passport (so you can check to see if it matches the name on the British passport application)

- is shown on their registration system (some countries have a central registration record that all official documents align to)

You must tell the customer to get a replacement foreign passport in the name shown on the British passport application, if the evidence shows their foreign passport was in a different name. However, you must also consider if there are other exceptions that stop the customer from changing their name on the foreign passport.

## Customer provides a replacement passport

If the customer provides a replacement foreign passport, you must check if the name on it matches the name on their British passport application (in line with this guidance).

## Customer gives evidence of name on lost or stolen passport

In some cases, the issuing authority can only provide evidence of the customer's name on the central register (from which they issue the passport).

When you get evidence from the issuing authority that shows what the customer's name was on lost or stolen passport (or from the central registration records), you must check if it matches the name on British passport application.

## Evidence from issuing authority show the names match

If the names match, you must continue to deal with the application (in line with current guidance).

## Evidence from issuing authority show the names do not match

If the evidence from the issuing authority shows the names do not match, you must:

- check if there are any other exceptions that stop the customer from changing their name with the foreign authority (to match the name on the British passport)
- ask the customer to get a replacement passport in the name shown on the British passport application (if there are no other exceptions that stop the customer from changing their name)

You must deal with the application in line with this guidance, if:

- there are other exceptions that stop the customer from changing their name to match the name on their British passport
- the customer provides a replacement foreign passport (to check the name on it matches the name on the British passport application)

## Exceptions: customer does not wish to renew expired foreign passport

If the customer does not want to renew their expired foreign passport, or replace their missing foreign passport, and there are other exceptions that stops them from changing their name, you must:

1. Add a case note to show all the actions and decisions you have made (see Names: name related case notes for what you must include in the case note).
2. Add the OBTO observation to the passport, to show the customer is also known by another name (unless the foreign passport is in a different gender).
3. Issue the passport in the name on the British passport application.

If the customer does not want to renew their expired foreign passport or replace their missing foreign passport, and there no other exceptions that stop them from changing their name, you must tell them:

- they must apply to change their name with the foreign authority
- to provide evidence from foreign authority that shows they have applied to change their name on the central registration system (to match the name in the British passport)

When you get the evidence, you must:

1. Check the evidence is from an official authority (for example, from an embassy, government authority, consulate or High Commission).
2. Check the document is scanned onto the system as a permanent record (see scanning supporting documents).
3. Add a case note to show all the actions and decisions you have made (see Names: name related case notes for what you must include in the case note).
4. Issue the passport in the name on the British passport application.

## Exceptions: customer is in process of aligning their name

We will issue a British passport using the name on the passport application, if the customer has a foreign passport or document in another name, but they give us evidence that shows they are in the process of changing it. Evidence we will accept includes:

- an official letter from an embassy, government authority, consulate or High Commission, that confirms:
  - the customer has submitted their foreign passport to change the name on it
  - what name will be shown on the new foreign passport (as we need to make sure it matches the name on their British passport application)
- a digital or paper receipt from an issuing authority, that shows:
  - the customer has submitted an application to change the name on their foreign passport
  - what name will be shown on the new foreign passport (as we need to make sure it matches the name on their British passport application)

This is because:

- it may take a long time for the foreign authority to issue the foreign passport or document
- we will be satisfied the customer told them about their name (using the evidence they give us)

When you get the evidence, you must:

1. Not wait for the customer to send us their new foreign passport or document (to show they have aligned their name).
2. Check the document is scanned onto the system as a permanent record (see scanning supporting documents).
3. Add a case note to show all the actions and decisions you made, with reasons (see Names: name related case notes for what you must include in the case note).
4. Issue the customer with a passport using the name on their passport application (you do not need to add any observations to show they have a foreign passport in another name).

If you are dealing with an application where a customer is experiencing issues with the process of aligning their name due to an ongoing crisis situation, you must consider any exceptional measures agreed.

## When observations may cause the customer problems

We add observations to passports when we issue one to a customer and they have a foreign passport or document in another name. The observation shows the country where the passport is from and what name the customer is using in the passport, travel document or identity document.

Customers may tell us that the observation will cause them problems, for example, when it:

- names a country that has political differences with another country that a customer travels to
- shows they have a foreign passport in another name, and it will put them at risk when they return to their home country

When they do, you must:

- still issue them a British passport with an observation to show they have a foreign passport or document in another name (observation OBTZ)
- refer to the additional passports guidance, to consider issuing the customer with an additional passport with restricted validity to cover the period of travel, that does not show the:
  - name of the country where the passport, travel document or identity document is from (if the observation names a country that will cause the customer travel problems)

- name of the foreign passport (travel document or identity document) is in (if the observation contains a name that will cause the customer travel problems)
- observation (if the foreign document is in a different gender)

## Names observations for disputed territories

A disputed territory is a territory claimed by more than one sovereign state. Disputed territories include:

- Palestine
- Crimea
- Taiwan
- Kurdistan
- Northern Cyprus

We must make sure the customer will not experience any issues when travelling because of the observation. If you need to add an observation that refers to a passport issued by a disputed territory you must raise a guidance query with QuEST.

You, the QuEST team member, must email Document Policy Queries (managed by the Foreign, Commonwealth & Development Office (FCDO)) to ask:

- how we must record the name of the disputed territory when we refer to it in the passport observation
- if the customer will experience any issues when travelling if we add the observation

You, the QuEST team member must tell the examiner to add the observation as per the FCDO's advice.

## Adding name related observations to other British passports

If we add an observation to a passport to show the customer has a foreign passport, travel document or identity document in a different name, we need to add it to any other type of British passports they have (including additional passports).

Customers must submit applications and pay to have all British passports they hold renewed so we can add the correct observations to each passport. They must do this before we complete the current application and issue the passport.

You must raise a guidance query if the customer:

- does not submit and pay for an application for each of their British passports or does not want to pay to renew their other British passport it (for example, because it is not due to expire for some time)
- tells you they cannot submit their other passport (for example, as they are using it for travel)

QuESt will decide what to do about the other British passports and may contact the Passport Policy team for advice.

**Related content**

[Contents](#)

# The administrative fairness test

This section tells His Majesty's Passport Office operational staff about the administrative fairness test and how it can be used in exceptional occasions when we will issue a passport in the name on the passport application, even though it does not match the name on a customer's foreign document.

An administrative fairness test allows us to make sure our processes and the decisions we make:

- are reasonable and fair, using discretion (when necessary)
- take in to account the customer's circumstances (using the evidence they give us)

## When we will use the administrative fairness test

We will use the administrative fairness test, for the small number of customers:

- whose name on their passport application does not match the name on their foreign document
- whose reason they cannot change the name on their foreign document, does not meet one of our existing exceptions, for example, due to transliteration regulations or the customer does not hold a current ID document as evidence to be able to update their foreign document
- who tell us they had (or will have) difficulty changing their name on their foreign document, for example, because the process to change it:
  - means they need to travel to the country where the document is from
  - means the customer may incur unreasonable costs if they were required to travel to update the document (unreasonable costs will be different in each case, at the time of the application)
  - would take a long time, for example, it may take the customer 6 months to update their foreign document in the country where the document was from and they may be unable to take time off work to complete this
  - means they would need to get consent from someone else, but the customer cannot get it, for example, because it would put them at harm or the other person is deceased
  - is really complex

## How we will use the administrative fairness test

The administrative fairness test helps us decide if there is a reasonable way for a customer to change their name on a foreign document to match the name on their passport application, taking in to account:

- the information and evidence:

- the customer gives us (that shows why they cannot change their name and how they will be impacted if they were to carry out the process of changing it)
- in Knowledge Base
- the risk of customers using multiple identities
- if it is proportionate for a customer to align their foreign document (based on the customer's individual circumstances)

If we decide the only way a customer can change their name on their foreign document, is:

- unreasonable, we will:
  - issue them with a passport with full validity
  - add an observation that provides a link to the name in their foreign passport or document (unless the foreign document is in a different gender)
  - tell them we recommend they align their name before they come to renew their new British passport
- reasonable, we will tell them that we cannot issue a passport until they either:
  - change their name on their foreign document to match the name on their passport application
  - give us evidence that they made an application to change the name on their foreign document

If the customer is unable to align their name on their foreign passport, travel document or identity document, you must not tell the customer to change their current name used on the passport application, to match their foreign document (for example, by deed poll). You must consider our exceptions and applying the administrative fairness test in these applications.

For passport purposes, we can accept the name shown on the customer's foreign document if the customer meets both reasons of having:

- already chosen to change their name used on their passport application, to the name shown on their foreign document (for example, by deed poll)
- provided evidence to show the name on their foreign document is the name they use for all official purposes

## **Making a decision under the administrative fairness test**

In straightforward cases, examiners will decide if the only way a customer can change their name on a foreign document is unreasonable. For example, when a customer can only do it by travelling to the country where the foreign document is from and:

- doing so would have a significant impact on them
- they have a medical condition that means they cannot travel

If it is not straightforward or there are doubts, examiners will discuss the case with their operational team leader (OTL). If there are still doubts, examiners and OTL's

will discuss the case with the Quality and Examination Support team (to help with their decision making).

## Customer tells you the process to change names is difficult

If a customer tells you the process to change the name on their foreign document is difficult, you must check Knowledge Base, to see if it shows it is (for example, if it shows the customer must travel to and stay in the country where the document is from). If Knowledge Base:

- does not show the process of how they can change their name or shows the process and it does not appear difficult, you must send letter 344, to ask the customer for:
  - official evidence that shows the process they need to follow to change their name
  - a statement that shows how they will be impacted if they were to carry out the process of changing their name
- shows the process to change the name and it appears difficult, you must send letter 344, to ask the customer for a statement that shows:
  - the process they would need to follow to change their name (we do not need official evidence)
  - a statement that shows how they will be impacted if they had to carry out the process of changing their name

## Evidence to show how difficult the process is to change the name

We may need evidence from the customer that confirms the process to change their name in their foreign passport or document is difficult. Examples of evidence that shows the process is difficult includes, written instructions from a consulate, embassy or foreign authority or information from an official government website that shows the:

- process to change a name is long or complex
- customer must travel to (or stay in the country) where the document is from
- customer cannot ask someone else to change their name (on their behalf)

## Statement to show how the customer will be impacted

Customers must provide us with a signed statement that tells us how they will be impacted (by carrying out the process of changing their name) for example, if:

- they have caring responsibilities
- they have a medical condition or disability that would make travelling difficult
- it will be unreasonably expensive for them (this is the extra expense the customer must pay to change the name, other than the cost of a passport application, for example, if they need to travel to the country where the passport is from)
- they are working or in education and cannot take time off
- their safety would be put at risk

- they have claimed asylum from the country where the foreign document is from

You must be aware:

- that we need a statement rather than evidence, as we:
  - do not expect customers to send us evidence of their circumstances (for example, financial situation or caring responsibilities)
  - consider what the customer tells us in their statement
- the impact on one customer may be different to the impact on another customer

## When you get the evidence and statement

When a customer provides you with evidence of the process to change their name and a signed statement confirming how it will impact them, you must:

- carefully consider whether the only way a customer can change their name is reasonable
- scan it on to the system (so you have a permanent record of it)

When making your decision, you must take into account:

- the process the customer would have to follow to change their name (using the evidence they gave and Knowledge Base) and how reasonable it is, for example:
  - how long it takes
  - do they need to travel to (or stay in the country) where the foreign document is from
- if the reason the customer cannot change their name already meets one of our other exceptions
- if there are other reasonable ways for the customer to change their name, for example:
  - do they have a friend or relative they can stay with, while they change their name
  - do they regularly travel to the country where the foreign document is from (as they may be able to change their name when they next travel)
  - can someone else change the name on their behalf (for example, a friend, relative or solicitor)
  - can they change their name on a foreign document by contacting their local embassy, consular office of High Commission
- if a customer has previously been granted asylum or refugee status

You must also consider if exceptional circumstances apply that may prevent the customer from being able to travel or stay in the country where the passport is from, for example:

- they would need to travel or stay away from home and this would be considered unreasonable, for example if:
  - the trip would incur expensive costs

- they have caring commitments, that would be impacted as a result of travelling
- the trip would incur unreasonably expensive costs (for example, if they have to travel to (or stay) in the country where the document is from)
- they have employment, family or education commitments
- they have a medical condition or disability
- there are safety risks, if they were to travel to the country where the foreign document is from (in cases where FCDO advice shows there is no risk of travelling)

If the exceptional circumstances apply and the customer is unable to travel or stay in the country where their passport is from, you must ask them to supply us with evidence.

If you do not have enough information or evidence to help you make a decision, you must ask the customer for more.

If it's clear from the evidence the customer gave you that the only way they can change their name is:

- reasonable, you must refer to [if you \(or QuEst\) decide the only way a customer can change their name is reasonable](#)
- unreasonable, you must refer to [if you \(or QuEst\) decide the only way a customer can change their name is unreasonable](#)

If it's not clear from the evidence the customer gave you whether it's reasonable to change their name on their foreign document, you must discuss the case with your OTL, taking into account the customer's circumstances, evidence and statement.

If you, the OTL and examiner still have doubts, you must discuss the case with QuEst, to help with your decision making.

If a customer gives different information to that shown on Knowledge Base, you must tell the Guidance team, by raising a query with QuEst. The Guidance team will consider if they need to update Knowledge Base with the new information.

## Administrative fairness test: when you have made a decision

You must decide, based on all the information available to you, whether the customer can or cannot be reasonably expected to change the name on their foreign document.

### You decide a customer can reasonably change their name

If you decide the only way for a customer to change their name is reasonable, you must:

1. Send letter 345 to the customer, to tell them:

- you have considered their circumstances and evidence and that you cannot issue them a passport (until they change their name on the foreign document to match their name on their passport application)
  - to send you any other evidence that shows they cannot change their name
  - to send the foreign document back to you when they have changed their name (or a colour photocopy for any renewal application or other application types only where you have seen the original document already)
2. Check if the customer has sent in the original foreign document, or a copy of the foreign document.
  3. If the customer has sent in a copy of the foreign document and you are dealing with the application on:
    - Application Management Service (AMS), you must tell the customer to get the name on their original foreign document updated and continue to deal with the application on AMS
    - Digital Application Processing (DAP), you must tell the customer to get the name on their original foreign document updated and continue to deal with the application on DAP

If the customer has sent in the original foreign document and you are dealing with the application on:

- AMS, you must take a copy of the foreign document and return the original to the customer by secure delivery (so they can change the name on it)
- DAP, you must update ARD (Application Receive Domain) to return the original document to the customer by secure delivery

Then, you must:

1. Add a case note to show all the actions and decisions you have made (see Names: name related case notes for what you must include).
2. Wait for the customer to respond.
3. Withdraw the application (in line with the withdrawal of passport applications guidance) if the customer does not respond or refuses to change their name.

When you get the foreign document back, you must check that the customer's name matches the name on their passport application, in line with this guidance.

If the customer provides other evidence why they cannot change their name, you must refer to when a customer gives you evidence that shows they will have or have had difficulty changing their name.

## You decide a customer cannot reasonably change their name

If you decide the only way a customer can change their name is unreasonable, you must:

1. Send letter 346 to the customer, to tell them you:
  - have considered their circumstances and that you will issue them a passport with fully valid passport

- the passport will have an observation to show they have a foreign passport in another name
  - can only issue a passport without an observation, when their name aligns
  - recommend they align their name, before their new British passport expires
2. Add a case note to show all the actions and decisions you have made with reasons (see Names: name related case notes for what you must include in the case note).
  3. Check the document is scanned onto the system as a permanent record (see scanning supporting documents).
  4. Issue a passport with full validity with an observation to show the customer's name in their foreign passport, you must amend observation code OBTZ:
    - if the holder's forenames and surname are clearly recognisable to show:

THE HOLDER HAS A [name of country] [passport, travel document or identity document], NUMBER [passport, travel document or identity document number], ISSUED ON [date], IN THE NAME OF [name on that passport, travel document or identity document]. THIS [passport, travel document or identity document] IS DUE TO EXPIRE / EXPIRED ON [date]

- if you need to clearly show which are the customer's forenames name and surname, to show:

THE HOLDER HAS A [country] [passport, travel document or identity document], NUMBER [passport, travel document or identity document number] IN THE FORENAMES OF [forename] AND THE SURNAME OF [surname], ISSUED ON [date]. THIS [passport, travel document or identity document] IS DUE TO EXPIRE / EXPIRED ON [date]

If the foreign document is in a different gender, you must:

- issue the passport without an observation
- amend letter 346 to remove the references to observations

If a customer tells you that adding an observation that shows they have a foreign passport or document in another name will cause them problems, you must refer to when observations may cause travel problems, or put a customer at risk.

## **Related content**

[Contents](#)

# DAP: name alignment

This section tells HM Passport Office operational staff how to deal with applications on DAP (Digital Application Processing) where the customer holds a foreign passport.

For application processed on DAP (Digital Application Processing) we may identify the customer holds a foreign passport in 3 ways:

- when a customer applies online on DCS (Digital Customer Service) they are asked if they hold a foreign passport; if they answer yes, DAP will create a **Foreign passport name alignment** examiner task
- if the customer applies using a paper form, DAP will not create the task, you must check section 3 of the paper application form to see if the customer has declared a foreign passport
- while you are processing their paper or online application you may find out the customer has a foreign passport, travel document or identity document that they did not declare when they applied

If you identify the customer holds a foreign passport, you must check the customer's name on that document aligns with their application for a British passport. See [Aligning names on foreign documents](#).

## DAP: if the customer holds a foreign passport

If the customer holds a foreign passport, travel, or identity document, you must check:

- if we have received the customer's foreign documents (originals or colour photocopies)
- the foreign documents to see if the customer's name on the document matches the one on the application
- Knowledge Base to see if there are, for example, naming conventions or restrictions on changes (if the names do not match)
- if there's an exception that means you do not need to ask the customer to align their name (if the names do not match)

## DAP: foreign passport name alignment task

For applications made online, the **Foreign passport name alignment** task will ask you 'Can you confirm the names align, or there is an allowable exception?'. To process the task, you must add a case note to explain the actions and decisions you made and select:

- **Yes**, if the customer sent us their foreign passport or document (or colour photocopy where this guidance says it can be accepted) and:
  - the name on it matches the one on the application

- the name does not match but you can apply an exception that means they do not need align their name
- the name does not match but you are using the administrative fairness test and decide they do not need to align their name
- **No, withdraw application**, if the customer sent us their passport or document, and their name does not match the one on their application and you are withdrawing their application because either:
  - you cannot apply an exception and the customer will not align their name
  - the customer will not provide evidence for the administrative fairness test
- **No, need new documents**, if you need to send an email (using the comms builder) to the customer because:
  - they did not send us their foreign passport or document and you need to see it to check their names
  - they need to align their name in their foreign passport or document and you are returning the original to them, from the DHU
  - you need to tell the customer to align their name, in their foreign passport or document (if we have only received a copy of their document)
  - their names do not align, and you need to tell the customer to provide evidence so you can use the administrative fairness test
- **Delay decision on this task**, if you cannot deal with the task right now (because you need to email the customer as part of another task)
- **Refer for investigation** (after you have completed additional checks) if you have fraud concerns

Selecting **No, withdraw application** will withdraw the application. You must:

- send the customer an email using Comms builder explaining the reason for withdrawing the application (for example, because the customer will not provide the evidence we need or refuses to change their name)
- update the handling instructions in ARD, if you need to retain the customer's British passport (see Customer refuses to change name: renewal and replacement applications).

## DAP: applications without a foreign passport name alignment task

For paper applications, or applications where you identify the customer holds a foreign passport (but they did not declare it when they made the application), you will not have a **Foreign passport name alignment** task. You must continue to follow this guidance, and case note your actions and decisions using another task.

## DAP: foreign passport name alignment process

This table is a summary of the DAP process steps shown above:

Does DAP show a name alignment task?	Has the customer sent their foreign passport, travel, or identity document?	Do the names align?	Add a case note, to record your actions and decisions and:
Yes	Yes (or a colour photocopy that this guidance says we can accept)	Yes	Select <b>yes</b> in the task
Yes	Yes (or a colour photocopy that this guidance says can accept)	No	Select <b>yes</b> in the task if you decide the customer does not need to align their name because: <ul style="list-style-type: none"> <li>the country guidance in Knowledge Base confirms alignment is not possible and you are applying an exception</li> <li>you have used the administrative fairness test</li> </ul> You may need to add an observation to show the customer holds a foreign passport in another name
Yes	Yes (colour photocopy or original documents handled by the DHU)	No	Select <b>no, need new documents</b> and use Comms Builder to tell customer to <b>update name on foreign document</b> (and send us their new document or a colour photocopy where its acceptable in this guidance, when it's changed) <p>Update ARD (Application Receive Domain) to return the original passport so the customer can align their name.</p>
Yes	Yes	No	Select <b>no, withdraw application</b> in the task if you cannot apply an exception and the customer will not align their name, or they will they not provide evidence for the administrative fairness test
Yes	No	Not known	Select <b>no, need new documents</b> and contact the customer using Comms Builder to <b>send latest foreign document</b>
No	Yes	Yes	Case note in another task, to show the names align
No	Yes	No	Case note in another task, if you decide the customer does not need to align their name because:

Does DAP show a name alignment task?	Has the customer sent their foreign passport, travel, or identity document?	Do the names align?	Add a case note, to record your actions and decisions and:
			<ul style="list-style-type: none"> <li>• the country guidance in Knowledge Base confirms alignment is not possible and you are applying an exception</li> <li>• you have used the administrative fairness test</li> </ul> <p>You may need to add an observation to show the customer holds a foreign passport in another name</p>
No	Yes (colour photocopy or original documents handled by the DHU)	No	Select <b>no, need new documents</b> in another task and contact the customer using the Comms builder, telling them to <b>update name on foreign document</b>
No	Yes	No	Select <b>no, withdraw application</b> in another task if you cannot apply an exception and the customer will not align their name, or they will not provide evidence for the administrative fairness test
No	No (but we find out the customer does hold a foreign document during examination)	Not known	Select <b>no, need new documents</b> in another task and contact the customer using Comms Builder to <b>send latest foreign document</b>

If you applied an exception, you may need to add an observation (for example, code OBTZ) to show the customer has a foreign document in a different name. This will depend on the exception you applied.

### Related content

[Contents](#)

# Declaring foreign passports

This section tells His Majesty's Passport Office operational staff how the customer declares a foreign passport, and how to deal with a customer who does not declare another passport.

The UK allows its citizens to hold dual citizenship. Although we do not tell other countries if a customer has dual citizenship, we still ask them to declare any valid or expired passports when they apply for a British passport. We do this:

- for security reasons
- to help us:
  - decide if the customer is entitled to a British passport
  - confirm the customer's identity
  - identify any vulnerability concerns
- because we need to consider if the customer is able to apply for another foreign passport

Regardless of how the customer makes their passport application, we ask them to declare any other valid or expired passports at the time of application. This includes applications made:

- by paper application (section 3 of the application form)
- online, by Digital Customer Service (DCS) (where a specific question is shown, which will then generate a task in Digital Application Processing (DAP) for the examiner)

It is a criminal offence if a customer does not declare another passport. If we find they have not:

- they may be subject to prosecution
- we may cancel their British passport (if they have one)

We will also investigate the reasons and decide whether to refer them for a criminal investigation.

## Declaring another passport when a customer makes an application

The customer must tell us whether or not they hold any other passport when they apply for a British passport.

### Customer declares a passport but does not provide details

If a customer tells us (on their passport application) that they have another passport but does not give details, you must:

- ask them to send the other passport (or colour photocopy of a foreign passport on renewal applications) to you so you can consider it as part of their application
- check that the name on the other passport matches the name on their passport application (in line with this guidance)

## Customer declares they do not have another passport

If the customer completes their passport application and states, they do not have another passport, you must:

- take no more action if it's a renewal or replacement application for a British passport
- ask the customer to provide the document they used to travel, if they:
  - live in a different country to the one they were born in and it's a first time passport application
  - originally told us they did not have a passport when they made their application, but tell you later, when you examine their application

When you get the customer's travel document, you must check their name on the passport or travel document matches the name on their passport application (in line with this guidance).

## Customer does not declare if they have another passport

On a paper application form, if a customer does not tell us whether they have another passport, you must contact them and ask them to confirm the details of all other passports they have.

You must take no more action and deal with the application, in line with current guidance, if the:

- customer tells you they do not have another passport and they live in the country they were born in
- customer tells you they have a British passport and it's the one they sent with their application (or reported lost) regardless of where they live
- information the customer provides relates to a British passport

If a customer tells you that they:

- have a foreign passport, you must:
  - ask them to send it to you so you can consider it as part of their passport application (or a colour photocopy for renewal applications)
  - check the name matches the name on their passport application (in line with this guidance)
- do not have another passport, but they live in a different country to the one they were born in and it's a first time passport application, you must:
  - ask them to send you the travel document they used to move from their country of birth

- check the name matches the name on their passport application (in line with this guidance)

## When you find a previously declared a foreign passport

During examination, you may find a customer may not previously have declared a foreign passport at the time they made an application for a British passport. You might find this when they send:

- an application to renew or replace their British passport
- their British and foreign passport as part of a linked application (for example, when a parent sends them as part of their child's passport application)

You must check the customer's passport record to see if they declared a foreign passport when they made an application for their own British passport.

If they did and the name matches the name on their British passport, you must:

- not take any action
- deal with their renewal or replacement application (or the linked application), in line with current guidance

## When a customer does not declare a foreign passport

If you are dealing with a live passport application and you find a customer has not declared a foreign passport at the time they made the application for a British passport, you must:

1. Send the customer letter 347 to ask them to send you:
  - the foreign passport, if you do not already have it, (or a colour photocopy if a renewal application)
  - a written statement to explain why they did not tell us about their foreign passport when they made their application for a British passport (DAP letter Applications with a connection from abroad that need more documents or AMS (Application Management System) phrases 300R or 301M)
2. Pigeonhole the application in your team while you wait for them to respond.
3. If it is:
  - a live application, scan the written statement on the system
  - not a live application, you must add a passport note to the record to show the reason why the customer did not declare their foreign passport
4. Check if the name on the foreign passport matches the name on their British passport.

If the names on the foreign and British passports match and there are no other concerns with the application, you must:

- take no more action
- deal with any other linked application (in line with current guidance)

If the names on the foreign and British passport do not match, we will consider cancelling the customer's British passport. You must raise a guidance query with the Quality and Examination Support team (QuEST). You must include:

- all supporting evidence
- the reasons why you think we must cancel the British passport
- if the reason the names do not match is because it meets one of our exceptions

If QuEST tell you not to cancel the customer's passport, you must:

- not cancel it
- deal with the renewal or replacement application or linked applications (in line with current guidance)

If QuEST tells you to cancel the passport, you must:

1. Contact the customer by phone and tell them:
  - you need to cancel their British passport because they gave us incomplete information when they applied
  - to send you a new passport application, photos and fee so that you can carry out a full check on their identity and entitlement to a British passport
2. Use AMS to send letter 349 to tell the customer:
  - you will withdraw their British passport because they did not disclose their foreign passport
  - to return the passport to us
  - they can apply for a British passport by completing a new countersigned application, photos and fee
3. Send the British passport to the Lost Stolen and Recovered passport team in Peterborough so they can treat it as a recovered passport, if the customer sends it to you (see lost, stolen and recovered passports guidance).
4. Add a case note to show all the actions and decisions you have made (see case noting names for what you must include in the case note).

If you have any concerns with the customer's identity, you must:

- refer the application to an Enhanced Application Checking examiner, if you are processing on AMS
- complete additional checks (and **Refer for investigation** if required) if you are processing on DAP

For example, when a customer's other personal details on the foreign passport do not match the details on the British passport.

## Related content

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