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* Gender neutral language
* Reference to Senate Academic Regulations replaced with updated Examination and Assessment Policy and Procedures
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If you require this information in large print or another format please contact Assurance Service at AssuranceServices@cardiff.ac.uk

**Foreword**

It is important for the security and safety of all members of the University and its visitors that the University is able to confirm the identity of anyone on its premises.

The principal mechanism used to identify members of the University is the Cardiff University Card, which holds basic information including a photographic image. The Cardiff University Card is a multi-purpose card which staff, officers, students and some visitors use while working for or on behalf of, or studying at, Cardiff University.

This Code of Practice provides measures to allow staff to ensure that all students, staff and visitors in any University buildings or campus facilities have a legitimate reason to be there in order to work towards ensuring a safe environment for staff, students and visitors.

The Code of Practice enables those holding Cardiff University Cards to understand when and how they may be asked to produce these cards whilst at the University.

The Code of Practice also provides for the legitimate use of the photographs (separately from the cards) and the safe storage of the photographic images.

The Code will be reviewed bi-annually taking into account feedback on its operation and the wider security context.

**Assurance Service, Department of Strategic Planning and Governance**

**July 2020**

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**CARDIFF UNIVERSITY**

**PHOTOGRAPHIC IDENTIFICATION CODE OF PRACTICE**

**SECTION 1 - INTRODUCTION**

**1.1 Code of Practice Statement**

Cardiff University is committed to the health and safety of its students and to providing safe campus and facilities for its staff, students and visitors.

All staff and students are required to carry their Cardiff University Card when on University premises and to produce it if asked by an appropriate person.

Cardiff University Cards will occasionally be issued to visitors e.g. contractors working at the University. Any person issued with a Cardiff University Card will be subject in the same way to the principles and procedures outlined in this code of practice.

**1.2 Expectations**

Cardiff University expects that:

* All persons on its premises will at all times adhere to the University’s rules of behaviour as set out in its regulations, policies and procedures.
* All persons on University premises will comply with any reasonable request to provide proof of their identity and all Cardiff University Card holders will be expected to produce this card as proof of their identity.

**Note:** Nothing in this Code limits the ability of University staff to ask for an alternative and/or additional form of identification other than the Cardiff University Card (such as passport) in appropriate circumstances.

**1.3 Relevant Legal Requirements Applying to Photographic Identification**

Health & Safety - Under health and safety legislation, the University is required as far as reasonably practical to ensure the health and safety of its staff and to take reasonable measures to protect its students and others who may be affected by its activities. The University’s Health and Safety Policies set out its arrangements for meeting the legal duties.

Data Protection - Any photograph of an identifiable living individual’s face take for security purposes will constitute that person’s personal data according to the Data Protection legislation. The University’s Data Protection Policy and data protection notice cover the processing of personal data by the University.

Discrimination - The University has a duty under the Equality Act 2010 not to discriminate unlawfully on grounds of religion or other similar belief) and this is explained in the University’s Policies on Equality and Diversity, and Religion and Belief .

Human Rights- It is a fundamental human right to hold religious beliefs but it is a qualified human right to manifest those beliefs, for example by the wearing of religious dress. The right to manifest religious beliefs, such as the wearing of religious symbols and dress, can only be limited in specific circumstances.

Summary - UK law permits the University to require its members to have a photo taken of their uncovered face for legitimate security reasons, and to be required to show the image of their uncovered face for legitimate security reasons, where this measure:

* applies equally to all people not just those wearing religious dress; and
* is proportionate to achieving the stated aim; and
* is reasonably justified by that aim; and
* is carried out in a fair manner.

**SECTION 2 - PHOTOGRAPHS AND OTHER CARD CONTENT**

**2.1 The Cardiff University Card**

The Cardiff University Card shall normally display the photograph, name and department of the person to whom it has been issued together with relevant ID numbers, a bar code and an expiry date. Cards may also display the NHS logo and/or the National Union of Students logo where such cards are also intended to be used by those organisations in partnership with the University.

Staff working in ‘high risk’ roles may feel that they do not want to have details of their School/Department printed together with their photo as this may put these members of staff at risk if the card is lost. If this is the case, staff should raise this with their line manager, who will make a decision on a case-by-case basis about omitting departmental information from the card.

**2.2 Taking of Cardiff University Card photographs**

Cardiff University Card

The photographs required for the Cardiff University Card will normally be taken by staff authorised to do so by the University’s Security Service or Academic Support and Student Services. Some categories of students are permitted to apply for an identification card by post by filling the relevant application form and providing a photograph. The Cardiff University Card is the University’s formal means of identification of its members.

Schools/Departments

The Cardiff University Card is the University’s principal means of identification of its members.

Where the School/department believes it is necessary to take its own photographs in addition to the centrally held photograph, **the same legal restrictions will apply and the safeguards as set out in this Code of Practice should be adhered** to. Schools/departments are advised to keep a record of the justification for their system and advise students of how this information will be dealt with by directing them to the [Student and applicant data protection notice](https://www.cardiff.ac.uk/public-information/policies-and-procedures/data-protection/student-data-protection-notice).

**2.3 Cardiff University Card photograph requirements**

Photographs on the Cardiff University Cards will show a clear colour picture of the head and shoulders of the individual. The face of the individual must be clearly shown.

Religious dress obscuring the face – dual card system

For individuals who wish to wear religious dress that fully or partially obscures the face (such as Niqab or Burqa), the following procedures will be followed for the production of the Cardiff University Card.

Two photographs will be taken at the same time by a female member of staff in a private room. The first photograph will be of the individual without any item of religious clothing covering their face and the second will be a picture of the individual wearing their religious dress. (Where applying by post they should provide two different photographs, one with the face covered and one without face covering, as described above).

These individuals will be provided with two separate identification cards each showing an alternative photograph. The student/staff member’s **main** card will show a photograph of the individual wearing their religious dress. The **subsidiary** card will show the individual with the religious dress removed so that the face is uncovered.

Individuals will be required to carry both cards with them at all times for the purpose of verifying identification. The procedure for use of the cards to verify identity is set out below in section 3.

Clinical settings

A specific Cardiff University/NHS combined card is produced for students undertaking clinical placements within the NHS. Dependent on individual school policy, clinical students may be required to display their Cardiff University ID card during clinical sessions. Students in clinical settings in the School of Optometry and Visions Sciences (OPTOM) must also have their Cardiff University Card on display during clinical sessions.

Due to NHS and professional body guidelines it is expected that the pictures on combined Cardiff University/NHS cards and the OPTOM students’ cards will show students without any clothing obscuring the face, including religious dress. Any objections to this will need to be considered by the relevant school in association with the relevant NHS Health Board and/or professional body.

**2.4 Storing of Cardiff University Card Photographs**

Cardiff University Card Staff photographs are stored on the Security PAC system (the access control software used by Cardiff University).

Cardiff University Card Student photographs are stored on the PAC system (the access control software used by Cardiff University) and, as appropriate, also held on the Student Information Management System (SIMS) database. In cases where students have specific requirements relating to religious dress, the main card image (i.e. the photograph showing the religious dress) only will be held in SIMS. The subsidiary card photograph (i.e. with the religious dress removed) will only be held by, and normally made available to, the University’s Security Services.

Generally photographs will only be accessible to staff who have been identified as requiring access to this information.

**2.5 Using Cardiff University Card photographs**

Photographs will be included on all Cardiff University Cards and will be used for the purposes of verifying the identity of individuals when required in accordance with the procedures set out in this Code of Practice. Any requests to confirm identity will be dealt with in a sensitive manner taking account of dignity, courtesy and respect. Section 3 provides more information on the circumstances relating to visual identity checks.

Photographs of students held on SIMS are also made available to relevant staff for compatible academic-related use but this does **not** include display in public/student access areas or circulation to other students without further permission.

For staff and students required to work on NHS premises the University may also disclose photographs to the relevant NHS Health Board for their security purposes.

Any further use of Cardiff University Card staff and student photographs will usually require the prior notification and permission of the individual unless it is necessary and justifiable on the grounds of health & safety or public safety (preventing or detecting a criminal offence, etc).

**SECTION 3 - CHECKING IDENTIFICATION**

**3.1 General principles**

The University has legal obligations to check the identity of its members in certain circumstances and this may require sight of a formal document such as passport. This Code does not prohibit this type of identity check based on a legal/external obligation.

The ability to identify all members of the University in other situations is a recognised security requirement and all staff and students are required to **carry** their Cardiff University Card at all times on University premises.

Those working in a clinical setting are also required to permanently **display** their Cardiff University Card in order that patients may identify the clinician treating/assessing them.

Where individuals are not actively displaying their Cardiff University Card they may be asked to produce that card for identification purposes, however the circumstances in which it is appropriate to ask for the Cardiff University Card will vary and for those using the dual card system (see Section 2.3 above) it will not be appropriate to ask for the subsidiary card in all circumstances.

Checks should not be carried out more frequently for individuals wearing religious dress.

**3.2 Different Categories of Identity Check**

**Category A: Checking for Group Membership**

Category A identity checks may be carried out by many different types of staff.

They are in order to establish that a person is a bona fide member of a certain group e.g. a Cardiff University member of staff or student, and therefore entitled to use or access a facility. These ID checks will include access to student bus services, sports facilities, libraries and routine access to other buildings.

**Religious dress obscuring the face** - Individuals should not normally be expected to uncover their face nor display their subsidiary card for the purpose of a Category A check. These checks can often be automated (for example card swipe to allow access). The main card should be sufficient for everyone in these routine situations.

**Category B: Checking for Individual Entitlement of Verification of Submission**

Category B identity checks may be carried out by different types of staff authorised to do so.

They are in order to establish that a person is entitled to undertake some transaction or to use or access a facility on grounds of their individual identity. These ID checks may include return of students’ coursework, validating of biological samples from health workers/students and issue of replacement keys.

**Religious dress obscuring the face** - It is likely that individuals will be expected to uncover their face and display their subsidiary card for the purpose of a Category B check – unless to do so would be disproportionate in relation to the risk, or other automated procedures are already in place (for example library self service issue desks). It is expected that Category B checks are likely to be planned events and where this is the case, the following procedures for checking photo ID must be put in place in advance.

1. The member of staff undertaking the check should give a clear explanation to the person who is being asked to confirm their identity of the reason for the identity check.

2. Any request to remove religious dress that covers the face in order to check identification should be dealt with in a sensitive manner taking account of dignity, courtesy and respect.

3. Individuals wearing a veil should be accompanied by a member of staff to a private area to remove their veil/show their face for the purposes of identification. The individual wearing the veil should be allowed to choose the gender of the member of staff who accompanies them for this purpose (e.g. if you are female you can ask to be accompanied by a female member of staff).

4. Where a member of staff of the chosen gender cannot be made available at that time, the individual will be given the option of having their identity confirmed by a member of staff of a different gender or of leaving the area and returning when a staff member of their chosen gender becomes available. The situation should be reviewed after this event to avoid the same circumstances arising in the future wherever possible.

**Category C: Security Check**

Category C identity checks are a security precaution and are therefore normally carried out by **Security Staff** acting on their own information or that received from a call out.

They arise in situations where there is:

1. a reasonable security concern or suspicion arising from the individual’s presence or behaviour, or
2. from a general increase in security precautions in response to a particular incident or information.

NB: Staff who are not part of the University’s Security Services are advised not to potentially put themselves at risk by attempting to detain individuals who they suspect are on University premises under false pretences. Instead staff are advised to contact the University’s Security Service on (029) 208 74444. If there is a need to contact the University Control Room from the Heath Campus, dial 02920 748043.

**All individuals will be expected to uncover their face and display their subsidiary card for the purpose of a Category C Security check.**

**Religious dress obscuring the face** – the following procedure should be followed:

1. The member of staff undertaking the check should give a clear explanation to the person who is being asked to confirm their identity of the reason for the identity check.

2. Any request to remove religious dress that covers the face in order to check identification should be dealt with in a sensitive manner taking account of dignity, courtesy and respect.

3. If there exists the option, at the time of the identity check, for an individual wearing a veil to choose the gender of the member of staff who checks their identity, they should be allowed to do so. They will then provide this member of staff with their subsidiary card, which shows their face and will be asked to remove their veil in a manner which gives as much privacy as possible without compromising anyone’s safety.

4. Where a member of staff of the preferred gender is not available at the time of the identity check, individuals wearing a veil will be required to confirm their identity with whomever is available to conduct the check. They will be expected to provide the member of staff, regardless of gender, with their subsidiary card and asked to remove their veil. This will be conducted in a manner which provides as much privacy as possible without compromising anyone’s safety.

5. If the individual refuses to comply with a Category C Security check conducted in accordance with the above procedures they will be asked to leave the premises and/or the matter may be referred to the police (see section 3.6).

It is recognised that Category C checks are not likely to be planned events, however there are certain situations, such as out of hours cover for buildings where the probability of the need to conduct a Category C check may be higher. Therefore, staff rotas should aim to ensure a balanced availability of genders for members of staff on duty, in so far as this does not put them at risk.

**3.3 Challenging a ‘Stranger’**

There may be other circumstances where staff may feel it appropriate to ‘challenge’ all strangers regardless of any specific suspicion, for example, in places where visitors are not usually seen and there are particular problems with thefts in the vicinity. In this situation an immediate approach for a photo ID check is not an appropriate response unless there are other reasons which satisfy a Category C check (3.2 above).

The most appropriate response where Category C conditions are not satisfied, is to ask the individual if you can offer them any assistance/directions in a courteous and non-threatening manner and thereby ascertain their purpose. If there is a justified need for a ‘challenge a stranger’ culture in a particular area then approaches should be made to all individuals unknown to the staff carrying out checks in that area not just the ones that ‘look suspicious’.

NB: Staff who are not part of the University’s Security Services are advised not to put themselves potentially at risk by attempting to detain individuals who they suspect are on University premises under false pretences. Instead staff are advised to contact the University’s Security Service on (029) 208 74444. If there is a need to contact the University Control Room from the Heath Campus, dial 02920 748043.

**3.4 Photo ID and Formal Assessments**

Students on taught programmes of study are required under Senate Assessment Regulations to place their Cardiff University Card on the desk in the Examination Venue for the duration of their Examination. Where a student wears religious dress covering the face the main card (i.e. with the face covered) will be sufficient for this purpose. Students are also required to fill in their student ID number (from their card) on an attendance slip. The Cardiff University Card will also be checked when a student does not appear on the Register. Given the significance of formal assessments, the pressure that candidates are under and the serious consequences of turning individuals away from examinations, special procedures will be followed where candidates have not brought their University Cards and/or identity is in question (Appendix 1).

**3.5 If the student/member of staff does not have their card with them**

In some circumstances an alternative form of identification will be acceptable e.g. confirmed identification by another member of staff, alternative photographic identification. However, in other cases if a student or member of staff cannot confirm their identity and reasons for being at the venue they will be asked to leave (with the exception of formal assessments, as set out in Appendix 1).

**3.6 If the individual refuses to comply with an ID check**

An individual can be asked to leave the building or campus if, in response to a Category A or C check, they refuse to show the relevant Cardiff University card and/or fail to provide valid reasons for accessing the building/campus area/facility. Services may be withheld from an individual who refuses to comply with a Category B check (with the exception of formal assessments, as set out in Appendix 1).

**3.7 If an individual’s face is covered by something other than religious dress**

In circumstances where an individual’s face is fully orpartially covered by anything other than religious dress e.g. motorbike helmet and a Category B or C check is required it would be reasonable to ask them to remove the facial covering.

**3.8 Breach of the Code of Practice and Further information**

Any breach of this Code of Practice may be dealt with under the relevant disciplinary and grievance procedure.

For further information about this code of practice and for any queries please contact Assurance Services in the Department of Strategic Planning and Governance.

**Appendix 1**

Identification of Students at Formal Assessments

In the Conduct of Students in Examinations section of the Examination and Assessment Policy and Procedures, it states:

*12.9 Your student card must be placed on your examination desk so that it is visible to invigilation staff.*

In accordance with the Invigilation Handbook, where a student has forgotten their ID, the invigilator will mark the attendance slip with ‘NO ID’. They will not enter discussion with the student unless the exam has not started, and they can request another form of photo ID.

Should the student forget or lose their Student ID card, they may bring the following alternative photographic ID in to the exam:

* Photographic Driving licence (UK) – Full or Provisional;
* Passport from the authorising body of their country.

Where individuals choose to wear religious dress that partially or fully obscure facial features (such as Niqab or Burka), these individuals will have been provided with two separate forms of ID. The individual’s main card will show a photograph with their religious dress in place.  A subsidiary card will also have been issued showing the individual with the religious dress removed.

For examination purposes, where the individual wears religious dress covering their face, their main ID card is sufficient. This card has been issued showing them in their religious dress. An individual wearing this form of religious dress should not be:

* asked to remove their religious dress
* challenged to provide their subsidiary card or alternative ID

Where the Invigilator believes that there may be a case of impersonation of a candidate, they shall either report the matter to a senior manager who can seek assistance of security staff to conduct an identity check or refer the matter as a potential Academic Misconduct incident, following the procedures laid out in the Invigilator’s Handbook.