

By email:

The Rt Hon Lucy Frazer QC MP, Financial Secretary to the Treasury
Daljit Rehal, HMRC Chief Digital and Information Officer
The Rt Hon Thérèse Coffey MP, Secretary of State for Work and Pensions
Simon McKinnon, DWP Director General, Chief Digital and Information Officer

Cc: Government Digital Services

28 April 2022

Dear Lucy Frazer MP and Thérèse Coffey MP,

Impact of HMRC withdrawal of GOV.UK Verify on EU and other non-British citizens

I am writing on behalf of the3million, a non-partisan grassroots organisation of EU citizens (by which we include EEA and Swiss citizens, and their non-EU family members) in the UK, formed after the 2016 EU referendum to protect the rights of people who have made the UK their home.

GOV.UK Verify was withdrawn from the following HMRC and DWP services from the 30th March 2022:

1. [Check your Income Tax for the current year](#) (HMRC)
2. [Help friends or family with their tax](#) (HMRC)
3. [Sign in and file your Self Assessment tax return](#) (HMRC)
4. [Sign in to your personal tax account](#) (HMRC)
5. [Apply for Universal Credit](#) with the Department for Work and Pensions (DWP)
6. [Check your State Pension](#) (DWP and HMRC)
7. [Get your State Pension](#) (DWP)

We have received numerous reports from citizens who now find themselves no longer able to access these services digitally and are struggling to access the services using the new process.

We started receiving reports as long ago as September 2020, when Government Gateway security was extended, and people who already had Gateway IDs found they were asked for new pieces of information to verify their identity. These included British passports, which obviously exclude non-British citizens. One example of these reports stated:

"I have settled status. I wanted to get my tax documents ready for online submission. I went to the Government Gateway site. The last time I accessed it was in April 2020, and there was no problem. They have now changed it and introduced additional safeguards. Technically, everyone has to submit further security check documents. There is supposed to be a choice of documents – passport, P60, credit reference, payslip, tax credit.

I was only given two 'options' out of which I had to 'choose' two. In other words, the system adapts for certain people. I had to be prepared to provide both items, there was no option for me. And, one of those 'options' is a valid UK passport, which I do not have, being an EU national with settled status.

When I wrote to HMRC to query this, I was told that if my circumstances did not meet the current verification criteria, I would not be able to use online services." - November 2020

Another example came from an Irish citizen who, as a self-employed person in the theatre industry during COVID, was reliant on grants under the Self Employment Income Support Scheme:

"I attempted to apply for the latest grant, but I find I am excluded because I do not have a UK passport or a UK photo ID Driver's licence. There is no other acceptable form of ID offered on the form. I have been unable to get advice from HMRC in spite of many calls and holding on the phone for up to an hour each time.

I desperately need help from the Self Employment Scheme as I have had no work since March. I have submitted tax returns every year for the last twenty-six years and always paid my income tax. I am feeling very shaken, distressed and isolated." - December 2020

For many citizens caught out by these new security checks which they were not able to use, they found that they were able to use Gov.UK Verify instead. For example, one person reported to us:

"I had a problem proving my identity to be able to apply for tax relief. After entering my NI number through the government Gateway, I was asked to provide two of these as proof: UK passport, UK driving licence, questions about my credit. I don't have a UK passport, and I don't drive so I don't have a driving licence.

Only after doing research for a while, I came across another service, not signposted, called GOV.UK Verify, through which I managed to prove my identity. Still this will cause problems for many people as that service is not easy to find." - March 2021

We have heard from citizens that they were given less than a month's notice that GOV.UK Verify would be withdrawn, in the form of a letter from HMRC dated 3 March 2022. The letter tells the recipient to use Government Gateway instead, telling them to "follow the on-screen instructions for Government Gateway" but gives no details of what people should do if they cannot supply the requested information.

From the 1st April 2022, we received numerous reports from people who were now unable to use HMRC and DWP services, since GOV.UK Verify was withdrawn, and the Government Gateway questions included options they were not able to satisfy. These options appear to always include a UK passport, and a Northern Ireland Driving Licence, so even those non-British citizens who were in possession of a UK driving licence (not from Northern Ireland) were unable to satisfy the criteria.

One example of such a report was:

"The government has just scrapped the GOV.UK Verify system and it requires us to sign through Government Gateway. The only way to verify identity online with Gateway is by uploading 2 proofs, but it gives only 3 ways and 2 of the 3 ways are for people who have a UK passport + NI driving licence. So at the moment, non-UK citizens are automatically cut off from all online services and are unable to check their tax situation online, and the only option is writing letters to HMRC and other government services." - April 2022

Although one of the Government Gateway information pages states that people will be asked to give details about two items they may have, and lists five examples (UK passport, payslips or P60, Self Assessment, tax

credits and Voice ID, Northern Ireland driving licence), we have seen that some people are offered far fewer choices when they proceed.

The reports included frustration at being unable to get help, for example:

"In the past I used to check my state pension via <https://www.postoffice.co.uk/identity/government-verify>, which worked without having a UK passport (I am an EU citizen). However, it seems that service has now been removed and the only way to check one's state pension is via <https://www.gov.uk/check-state-pension> - in order to proceed, however, you require a UK passport number.

I tried to call the number but the people at the other end of the line had no idea what I was talking about." - April 2022

One person was told "to try again at some point later in the year when they build functionality into the website to accommodate non-British citizens." Another reported of someone who "appealed the fine for a late self assessment due to being unable to create an account and was told to create an account." Another told us "it is not even possible to complain online as one must login in the first place."

This has serious consequences for many, beyond simply being unable to check their pension or access other information relating to their financial situation. One freelance journalist told us they desperately needed to get a UTR number in order to access larger contracts.

We note that the GOV.UK Verify information page (<https://www.gov.uk/government/publications/introducing-govuk-verify/introducing-govuk-verify>) gave over a year's notice that Barclays, Experian and SecureIdentity would be removed in March 2021. However, it gave less than a single day's notice (the website was changed on 30 March 2022) that:

"From 30 March 2022 the following services will use their own identity verification instead of GOV.UK Verify:

- *Apply for Universal Credit with the Department for Work and Pensions (DWP)*
- *Get your State Pension (DWP)"*

This change did not include all the HMRC services that would no longer use GOV.UK Verify from 1st April. On the 1st April 2022, we believe as a result of an Observer journalist contacting the Government (see <https://www.theguardian.com/money/2022/apr/06/hm-revenues-id-rules-are-driving-me-back-to-pen-and-paper>) a further change was made to the GOV.UK Verify website, adding the following section:

"From April 2022 the following services will use their own identity verification instead of GOV.UK Verify:

- [*Check your Income Tax for the current year*](#) (HMRC)
- [*Help friends or family with their tax*](#) (HMRC)
- [*Sign in and file your Self Assessment tax return*](#) (HMRC)
- [*Sign in to your personal tax account*](#) (HMRC)
- [*Apply for Universal Credit*](#) with the Department for Work and Pensions (DWP)
- [*Check your State Pension*](#) (DWP and HMRC)
- [*Get your State Pension*](#) (DWP)

We therefore have a number of questions, which we would be grateful if you could answer:

- Q1. Were any impact assessments carried out in relation to the 2019 replacement of the original Government Gateway with HMRC's new Government Gateway, which extended security? If so, could we receive a copy of it?
- Q2. Was any consideration given to existing (pre-2019) users of Government Gateway who were not British and would therefore not have a UK issued identity document?
- Q3. Was any consideration given to liaising with the Home Office and exploring whether 'share codes' via 'View and Prove your Immigration Status' could be integrated into the new Government Gateway's security questions?
- Q4. Were any impact assessments carried out for the withdrawal of GOV.UK Verify from the HMRC and DWP services? If so, could we receive a copy of it?
- Q5. Why was less than a month's written notice given to people that GOV.UK Verify would be withdrawn?
- Q6. We have seen an example of such written notice from HMRC. Was such notice also given by DWP? Was this letter sent to all users of all services affected by the withdrawal of GOV.UK Verify?
- Q7. Why was less than a day's notice given on the GOV.UK Verify website that two DWP services would be withdrawn?
- Q8. Why was no notice given on the GOV.UK Verify website that five HMRC websites would be withdrawn, and why was this information only placed there after contact from the Observer, and in any case after the service was already withdrawn?
- Q9. What mitigating measures have been put in place to help people affected by the inability to access online services from HMRC and DWP?
- Q10. Why are some people only offered a very small selection of items from which to choose two to verify their identity, such as "UK passport, Credit reference questions and Northern Ireland driving licence"? When will this be fixed to ensure that all people can choose from the full available list of items?
- Q11. When will the Government Gateway identity questions include the option to supply a non-British passport?
- Q12. When will the Government Gateway identity questions include the option to supply a driving licence which is not from Northern Ireland?
- Q13. When will the Government Gateway identity questions include the option to supply a Home Office 'share code' as proof of immigration status?

Yours sincerely,

Monique Hawkins
Policy and Research Officer, **the3million**