

(B)

(1)

[OPC official]

From: Blair Stewart
Sent: Thursday, 25 October 2001 13:32
To: [redacted] [OPC official]
Subject: FW: police vetting service

Bruce will give him a ring (as Bruce may be oin Checkpoint tonight and wants to be informed) but JG may get in touch with you about a briefing afterwards.

-----Original Message-----
From: privacy [mailto:privacy@iprolink.co.nz]
Sent: Thursday, 25 October 2001 13:06
To: Blair Stewart; Bruce Slane
Subject: FW: police vetting service

Office of the Privacy Commissioner
Tel 64 9 302 8680 Fax 64 9 302 2305
Box 466 Auckland New Zealand
Internet: <http://www.privacy.org.nz>

-----Original Message-----
From: Joe.Green@police.govt.nz [mailto:Joe.Green@police.govt.nz]
Sent: Thursday, 25 October 2001 13:20
To: privacy@iprolink.co.nz
Subject: police vetting service

I have been mindful for some time that the police vetting service has been significantly revised over the past 12 months.

I am very keen to get together with the Office of the Privacy Commissioner to outline and explain these processes, the way in which vetting is used, and some of the issues that we deal with as a result.

I am happy to travel if required.

Joe Green
manager: Licensing and Vetting



RECEIVED
01 FEB 2002

30 January 2002

The Privacy Commissioner
PO Box 466
Auckland

Dear Mr Slane

Please find attached a draft of the 'Suggested Vetting Service Policy Guidelines'.

This is designed to provide assistance to organisations receiving vetting services, enabling them to develop their own policies and practices, to ensure that the use of the vetting services, and the way in which information is used, is fair to the person being vetted and meets the requirements of the Privacy Act 1993 and natural justice.

I would be very interested to receive any comment or suggestions you might have.

Yours faithfully

Joe Green
Inspector
Manager: Licensing and Vetting

PL 474 8851.

Safer Communities Together

OFFICE OF THE COMMISSIONER

180 Molesworth Street, PO Box 3017, Wellington, New Zealand

Telephone: 64-4-474 9499, Facsimile: 64-4-498 7400, <http://www.police.govt.nz>

Draft

NEW ZEALAND POLICE
SUGGESTED VETTING SERVICE POLICY GUIDELINES

Organisations approved to receive vetting services may wish to consider the following as policy:

PURPOSE

The purpose of having potential employees, volunteers and contractors vetted is so that the more vulnerable members of society (children, older people and those with special needs) are not put at risk by being with individuals who have displayed behaviour that could be detrimental to their safety and wellbeing.

OUTLINE

- This policy applies to all applicants, whether on a paid or voluntary basis, being considered for employment (including contractors).
- Police will vet all applicants prior to employment. An applicant should not be hired or contracted conditionally in a position pending the results of Police vetting.
- Applicants should be told they are to be vetted by Police. Vetting can only be carried out under the provisions of the Privacy Act 1993, with the consent of the individual given on the correct Police form. Applicants should be given the opportunity to view any information provided by Police and, have the opportunity to correct this if necessary, in the interest of natural justice. A correction may be sought by writing to:

The Manager
Licensing & Vetting Service Centre

Draft

PO Box 3017
WELLINGTON

- As a result of vetting, Police may recommend that an individual **does not have unsupervised access to children, young people, or more vulnerable members of society**. The individual may wish to know the basis of such a recommendation and, in these cases, should write to the Manager: Licensing and Vetting Service Centre. Police will provide a response to the individual, detailing the basis for the advice given.

- The decision as to whether an individual is suitable or not for a given position remains with the employer. In making this decision employers might need to consider the following:
 - ❑ The nature of the offence and relevance to employment.
 - ❑ Length of time since the crime was committed.
 - ❑ Age and maturity now as compared to when the crime was committed, the seriousness of the crime e.g. length of sentence, use of a weapon, the circumstances at the time of violent behaviour.
 - ❑ Pattern of crime, e.g. a short spate may indicate a “phase” but a regular pattern may indicate continuing inappropriate behaviour.
 - ❑ The proximity of the person undergoing vetting to the vulnerable person(s). That is, are they to have unsupervised access to these vulnerable people?

- The information supplied by Police will be sent directly to a designated person within the requesting organisation. This information is to be stored **under** appropriate safeguards until a decision regarding employment has been made. While there is no specific definition of what appropriate safeguards might be, the information should be stored in such a way that there is no opportunity for privacy problems or embarrassment to occur.

- Information supplied by Police **must** be destroyed once it has served its intended purpose i.e. a decision has been made regarding employment. Burning or shredding the information ensures secure destruction.

Draft

➤ Details of police vetting are not to be disclosed to any staff, other than the individual tasked with handling this information.

➤ Police contact: [REDACTED] 4) 474 9413. [Police official]

Licensing and Vetting Service Centre

PO Box 3017

WELLINGTON



Privacy Commissioner
Te Mana Matapono Matatapu

Office of the Privacy Commissioner

Auckland
Level 8, Shortland Tower 1
51-53 Shortland Street, Auckland
PO Box 466, Auckland, New Zealand
Telephone 64-9-302 8680
Facsimile 64-9-302 2305
Email privacy@iprolink.co.nz
Internet <http://www.privacy.org.nz>

5 March 2002

Joe Green
Inspector
Manager: Licensing and Vetting
New Zealand Police
Office of the Commissioner
P O Box 3017
WELLINGTON

Dear Inspector Green

SUGGESTED VETTING SERVICE POLICY GUIDELINES (DRAFT)

Thank you for your letter of 30 January 2002. I regret the delay in replying.

I have passed this matter to [redacted] [OPC official] in our Wellington office who will handle the matter and get in touch with you. I would be grateful if you would notify [redacted] [OPC official] if there is a particular deadline to which you are working in drafting these guidelines.

Yours sincerely,

Blair Stewart
Assistant Commissioner

Ring Joe Green

Friday 8th March
- rang - not at work.

Wed 20 March.
2pm. Rang again
Phone rang unanswered + no voicemail.

[redacted] [OPC official]

From: [redacted]@police.govt.nz
Sent: Wednesday, 27 March 2002 11:19
To: [redacted] [OPC official]
Subject: Police vetting service guidelines

ph 470 7306.



Suggested Vetting Policy Guide...

[redacted] [OPC official]

Please find attached a copy of our draft guidelines that we intend to circulate to organisations using the Police vetting service. I have been informed by Blair Stewart that this matter has been passed to you. If you could please provide a response by Thursday 4th April, it would be most appreciated. There is currently an order in council requiring the Teachers Council to implement the vetting of school staff beginning on April 22nd. We hope to provide this information to schools prior to this date.

If you have any queries about the guidelines, please call me on (04) 470 7306.

Thank you

[redacted] [Police official]

Project Officer
Licensing & Vetting Service Centre.

(See attached file: Suggested Vetting Policy Guidelines.doc)

=====

WARNING

This message may contain information that is confidential and may be subject to the provisions of section 61A of the Police Act 1958, which creates an offence to have unlawful possession of Police documents. If you are not the intended recipient of this message or have received this message in error, you must not peruse, use, pass or copy this message or any of its contents.

Also note, the views expressed in this message may not necessarily reflect those of the New Zealand Police.

Guidelines aimed at schools who wish to vet volunteers.
i.e. outside statutory reqts.

Education Act 1989
amended by Education Standards Act 2001
- inserted the vetting provisions into the principal Act.

NEW ZEALAND POLICE

SUGGESTED VETTING SERVICE PROCEDURE GUIDELINES

These guidelines have been prepared to help approved organisations understand the vetting process and to assist these organisations develop their own procedures regarding the vetting process.

PURPOSE OF POLICE VETTING

1. The purpose of vetting is to minimise the likelihood of the more vulnerable members of society (children, older people and those with special needs) being put at risk by individuals who may have displayed behaviour that could be detrimental to others' safety and wellbeing.

WHAT IS POLICE VETTING?

2. Vetting, as conducted by the Licensing & Vetting Service Centre, uses 2 computer-based checks to search for information about an individual.
3. The first check is a search of the Law Enforcement System (formerly the Wanganui Computer). This provides a list of criminal and driving convictions. A printout is made of any such history that lists the location of the court, the date of the offence, the offence itself, and the sentence imposed. It should be noted that minor traffic infringements, such as parking tickets, are not shown on these printouts.
4. The second computer-based check is a search of other information held by Police. This information is used to look for behaviour of a violent or sexual nature that may not, for whatever reason, have resulted in a conviction. In cases where such

information exists, further investigation is carried out and the response may be “red stamped” (see “Results of Vetting”).

IMPORTANT: Police vetting is **not** a complete background check. It should be used only as part of a robust recruiting and screening process, such as that outlined in the publication “Safe Not Sorry” by Anthea Simock (The Institute for Child Protection Studies, PO Box 5375, HAMILTON).

THE PROCESS

5. Once an organisation has been approved to receive vetting services, Police will provide a copy of the correct “Consent to Disclosure of Information” form. Vetting can only be carried out with the consent of the applicant given on the correct form. Applicants should be told they are to be vetted and offered an explanation of the process.

Note: It remains the responsibility of the organisation to verify the identity of each applicant.

6. The completed consent forms are then sent by the organisation to the Licensing & Vetting Service Centre for processing.

7. A date stamp is placed on each request. This stamp indicates that each of the 2 computer checks have been carried out, the date of processing (there may be a short delay between receipt and processing), and the operator who completed the check.

8. If criminal and/or driving convictions are present, the printout will be attached to the request. Where there is information indicating violent or sexual behaviour (other than convictions), a “red stamp” may be placed on the request.

9. All completed vetting requests are then sent back to the organisation for their decision regarding employment.

THE RESULTS OF VETTING

10. The information supplied by Police will be sent directly to a designated person within the requesting organisation. This information is to be securely stored until such a time as it is no longer useful for the purpose it was obtained. The information should be stored in such a way that only those required to access the information are able to do so.

11. Applicants should be given the opportunity to view any criminal and/or driving conviction information provided by Police and, in the interest of natural justice, have the opportunity to correct this if necessary. A correction may be sought by writing to: The Manager

Licensing & Vetting Service Centre
PO Box 3017
WELLINGTON

12. The decision as to whether an individual is suitable or not for a given position remains with the employer. In making this decision employers might need to consider the following when assessing the results of vetting:

- The nature of the offence and relevance to employment.
- Length of time since the crime was committed.
- Age and maturity now as compared to when the crime was committed, the seriousness of the crime e.g. length of sentence, use of a weapon, the circumstances at the time of violent behaviour.
- Pattern of crime, e.g. a short spate may indicate a "phase" but a regular pattern may indicate continuing inappropriate behaviour.
- The proximity of the person undergoing vetting to the vulnerable person(s). That is, are they likely to have unsupervised access to these vulnerable people?

13. Where vetting indicates behaviour of a violent or sexual nature (that is not shown on an individual's criminal conviction printout), Police may recommend that an individual **does not have unsupervised access to children, young people, or more vulnerable members of society**. This is shown by way of a large red stamp. The individual may wish to know the basis of such a recommendation and, in

these cases, should write to the Manager: Licensing and Vetting Service Centre. Police will provide a written response to the individual, detailing the basis for the advice given.

14. Information supplied by Police **must** be destroyed once it is no longer useful for employment purposes. Burning or shredding the information ensures secure destruction.

15. Details of police vetting are not to be disclosed to any staff, other than the individual tasked with handling this information.

16. Police contact: [REDACTED] Liaison Officer, (04) 474 9413.

VETTING PROCESS (explanation)

The 'consent to disclosure of information', authorises police to release any information under the provisions of the Privacy Act 1993:

On being received at the Licensing and Vetting Service Centre each form is date stamped using the stamp below. This stamp also provides the basis for processing and response:

1 = LES check complete
2 = NIA check complete

Responsibility of organisation to confirm identity

Printout of criminal conviction from LES will be attached

New Zealand Police
Licensing and Vetting Service Centre

Checks	1	2
NOTE: INDIVIDUAL IS POSSIBLY IDENTICAL		
Date Received	05 FEB 2002	
Criminal convictions attached		
No criminal convictions recorded under details supplied		

Initials | Date

Criminal history printouts are marked IN CONFIDENCE and should be treated in accordance with Government Security classification requirements.

If information is held by police on the intelligence noting system, that is not clearly outlined in the printout of criminal history, and it is information that relates to behaviour that is of a violent or sexual nature the consent to disclosure form will be "red stamped":

Police recommend this person does not have unsupervised access to children, young people, or more vulnerable members of society.

Generally the reason for this advice will not be provided. Where it is provided, for example under a request made under section 66 of the Children, Young Persons and Their Families Act 1989, any documentation will be stamped 'SENSITIVE' and should be treated in accord with Government Security classifications. (The individual can obtain a copy of the basis for this advice – see attached suggested policy guidelines).

Where a person has active charges pending, the organisation will be advised to reapply, and a date provided (based on the date the charges are due to be heard, and Court processing time).

Where the 'consent to disclosure of information' is incomplete, or where vetting cannot be carried out for some other reason, the form will be returned stamped:

NOT PROCESSED

The attached 'Suggested Vetting Service Policy Guidelines' may form the basis for policy within an organisation.

VETTING GUIDELINES.

Notes for discussion 18/04/02.
[OPC official]

Joe Green: [Police official]

1. Need full explanation of the process.
 - form used by individuals to consent to vetting (statutory & non-statutory)
 - example of a vetting report:
 - what is disclosed to individual who requests clarification.
 - is it free. \$10 to Council. No Police charge. *Some statutory vetting, esp. for commercial purposes has a charge.*
 - Order in Council - pilot 22 April Wairarapa + Southland.

2. Two sets of guidelines? - statutory (esp. Education Status Act) & non-statutory
 - draft education guidelines together with [redacted] (School Trustees Assoc.) MoE officials (ex [redacted]) + Teachers Council.

e.g. education vetting excludes volunteers, doesn't require approval & doesn't have a "designated person"

MSD community caregivers.

3. Explanation of "vetting": *What does the term mean.* otherwise informed consent not possible.
 - not just criminal history check using ^{Dept for} Courts records.
 - checked against ^{NIA} DHS database. - charges pending etc. *discharges?*
 - firearms register?; overseas convictions notified to NZ (i.e. convictions of NZer overseas) *notified by Interpol to NZ* but not foreigners who come to NZ.

A What is checked.

some changes:

But no checking made with local police, no talking to people e.g. former employers, neighbours - not like SIS security clearance ^{check}

No checking of ~~driving offences~~ ^{for "clean" driver license to transport kids - apply to LTSA for traffic history rep} or CYPs involvement ^{convict}

No checking with Customs or DIA re suspected porn trafficking.

No tax default checks etc. No Interpol / ^{not all} Annex checks.

Police website says "check individuals' backgrounds"

Employers need to be made aware of the limitations of the checking.

- still need to do their own pre-employment reference checking, check documentation, make ^{appropriate} enquiries incl. if driving children.

Earlier police provided "particulars concerning the character of a person". Offer eval. OED "make a careful and critical examination of a candidate".

Not all bad eggs have criminal convictions

B) Criteria on which the assessment is made.

- subjective view of the Police? - a judgement call on what is relevant & what is safe for police to release without prejudice to investigators etc
 - what is relevant ^{to child safety} e.g. drug offence
 - staleness, severity etc.
 no spent convictions regime
- Joe discounts the publicity often placed on the MIA.

Accuracy: How is identity checked?

- School obligation to verify before asking for vetting. Police include caveats about identity.

C) What is provided

- stamp - not approved for unimpervised access.
- ^{criminal} convictions record / full criminal history. || Is it screened by Police for relevance?
- explanation only given to individual.

What about "fit & proper person" checks

- often for licensing situations
- are these not "vetting." - e.g. for positions of trust / hand.
- what about visa applications? - only get criminal history printout?
 CYP & FA Act ss 7 & 6c?
- MSD community caregivers, social workers, foster parents.
 IHC, Barnardos, CCS, Scouts, Red Cross
- Insurance claims.

Most statutory and all non-statutory vetting requires consent of subject.

4. Security, storage & destruction.

- Needs to be clearly worded.
- must be kept secure and free from risk of inadvertent disclosure.

IPP5. What do "approved organisations" sign up to? Who selects the "designated person" in voluntary organisations and audits their procedures?
 1,300 incl. many schools.

Destruction problematic. Will Teachers Council retain a copy? (esp of teachers)
 Should they be retained for successful appointees or existing employees up until next "vet". Keep with references even if positive in case appointment challenged.

5. Who should be vetted:

Overkill to vet all applicants

- waste of resources and time delays.

Only existing employees and preferred or short-listed applicants.

6. Vetting not carried out under Privacy Act

altho IPP's relevant to all aspects of handling personal info.

These are not access requests made by individual.

(unlike criminal record checks which might be seen as coerced access requests

Request is made ^{through} by Teachers Council: effectively statutory compulsion.

- either statutory (Education Stats Act) or an OI request made with authentication of individual to avoid §9(2)(a).

- not asking as agent/legal rep & not a request by individual.

7. Disclosure

No disclosure to Board of Trustees/Teachers Council

except recommendation?

Full disclosure of reasons of background information

to individual (s23 OIA Act) + Natural Justice + s27 NZBOR
- is this done in time to permit verification before decision made? (IPPB)

This may be workable for prospective employees (altho query whether statutory review rights cause problems) but what about existing employees. - a Police recommendation alone would not be sufficient to support a dismissal.

Cannot be used for other purposes e.g. performance assessments.

(Your letterhead)

CONSENT TO DISCLOSURE OF INFORMATION

under OIA Act ?

Authorised under
IPPA 11 ?

The Liaison Officer
Licensing & Vetting Service Centre
Office of the Commissioner of Police
PO Box 3017
WELLINGTON

I,
(Surname) (Fore Names)

.....
(Maiden or any other names used)

Sex.....(M/F) Date and place of birth.....

Nationality.....Residential Address.....

Suburb.....City.....

hereby consent to the disclosure by the New Zealand Police of any ^{relevant} information held about me they may have pursuant to this application, to «Company».

may hold about me that is relevant

organisation

For X purpose:

Signed..... Date.....

COMMENTS OF THE NEW ZEALAND POLICE

IPP3 Statement. - recipients & purpose of collection
e.g. want go to Baycorp

A stamped, self-addressed envelope must accompany all requests.

[redacted] [OPC official]

From: [redacted] [OPC official] ph 470-7306
Sent: Tuesday, 2 July 2002 19:59
To: [redacted] @police.govt.nz
Subject: RE: Suggested vetting policy

Ring him 3 July. Answerphone.
Left message saying I would
ring again late Thurs or Friday.

Hi [redacted] [OPC official]

I've been through the revised guidelines and they are much clearer.
However I do have some comments to make. I will try to ring you
tomorrow.

Ring him again
9 July. Left
message asking him
to ring me or
respond to email.

Can you please confirm whether you have made any changes to the two
associated forms "Vetting Process (explanation)" and "Consent to
Disclosure of Information".

Regards

-----Original Message-----

From: [redacted] @police.govt.nz [mailto:[redacted]@police.govt.nz]
Sent: Tuesday, 2 July 2002 1:14 p.m.
To: [redacted] [OPC official]
Subject: Suggested vetting policy

Need to provide us
with electronic versions
of the 2 associated
forms
- Vetting Process (explanation)
- Consent form

Afternoon [redacted]

I was just wondering if you 'd had a chance to look at the revised
guidelines I sent through. Could you please let me know your thoughts
about
these as soon as is convenient.

Many thanks

[redacted] [Police official]
Project Officer
Licensing & Vetting Service Centre

=====

WARNING
This message may contain information that is confidential
and may be subject to the provisions of section 61A of the
Police Act 1958, which creates an offence to have unlawful
possession of Police documents. If you are not the
intended recipient of this message or have received
this message in error, you must not peruse, use, pass or
copy this message or any of its contents.

Also note, the views expressed in this message may not
necessarily reflect those of the New Zealand Police.

Questions for [redacted] [Police official]

Who is it for?

Will this only be sent to "approved organisations"

- if so, why refer to employers and employment when will often be volunteers. (applicants?)

- if ^{so} ~~not~~, what guidelines will be sent to statutory bodies regarding staff vetting.

Who are the 1,300 "approved organisations"

Blair thought they only dealt with Head Offs

- this impacts on auditing & security - designated persons

- he didn't think the info ever reached the districts - just yes/no..

Are "suggested guidelines" all that is needed here?

Trying to do 3 things

① The document is providing information (1st half).
i.e. explaining what the Police vetting service is + process.

② " " " setting out police requests for "approved organisations"
- should deal with IPP 5 (storage & security) obligations
as well as IPP 9 (deletion)

③ Suggesting some policy guidelines for "approved organisations"

Give us electronic copies of the 2 associated forms.

- need to send them + my comments up to Blair.

**VETTING PROCESS
(explanation)**

This explanation covers both "approved organisations" and statutory bodies

The 'consent to disclosure of information', authorises police to release any information under the provisions of the Privacy Act 1993: — ?

On being received at the Licensing and Vetting Service Centre each form is date stamped using the stamp below. This stamp also provides the basis for processing and response:

1 = LES check complete
2 = NIA check complete

Responsibility of organisation to confirm identity

Printout of criminal conviction from LES will be attached

New Zealand Police Licensing and Vetting Service Centre		
Checks	1	2
NOTE: INDIVIDUAL IS POSSIBLY IDENTICAL		
Date Received	05 FEB 2002	
Criminal convictions attached		
No criminal convictions recorded under details supplied		
Initials	Date	

Criminal history printouts are marked IN CONFIDENCE and should be treated in accordance with Government-Security-classification requirements. — Privacy Act 1993.

If information is held by police on the intelligence noting system, that is not clearly outlined in the printout of criminal history, and it is information that relates to behaviour that is of a violent or sexual nature the consent to disclosure form will be "red stamped":

Police recommend this person does not have unsupervised access to children, young people, or more vulnerable members of society.

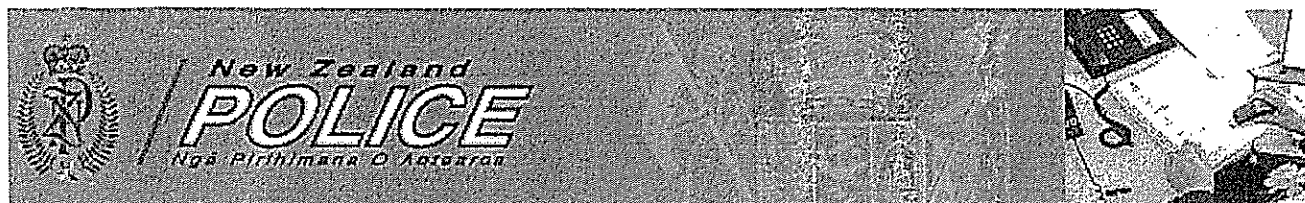
Generally the reason for this advice will not be provided. Where it is provided, for example under a request made under section 66 of the Children, Young Persons and Their Families Act 1989, any documentation will be stamped 'SENSITIVE' and should be treated in accord with Government Security classifications. (The individual can obtain a copy of the basis for this advice – see attached suggested policy guidelines).

Where a person has active charges pending, the organisation will be advised to reapply, and a date provided (based on the date the charges are due to be heard, and Court processing time).

Where the 'consent to disclosure of information' is incomplete, or where vetting cannot be carried out for some other reason, the form will be returned stamped:

NOT PROCESSED

The attached 'Suggested Vetting Service Policy Guidelines' may form the basis for policy within an organisation.



- [Home](#)
- [About Us](#)
- [Contact Us](#)
- [General Info](#)
- [Local Districts](#)
- [News](#)
- [Operations](#)
- [Recruiting](#)
- [Resources](#)
- [Safety Tips](#)
- [Service Units](#)
- [Armed Offend.](#)
- [Beat and Patrol](#)
- [Criminal Inv.](#)
- [Dive](#)
- [Diplomatic](#)
- [Dogs](#)
- [Drugs](#)
- [Financial](#)
- [Firearms](#)
- [Forensics](#)
- [Interpol](#)
- [Museum](#)
- [Missing Persons](#)
- [Overseas](#)
- [Road Policing](#)
- [Search & Rescue](#)
- [Vetting](#)
- [Youth](#)
- [Wanted](#)

Licensing and Vetting Service Centre

[Introduction](#) | [Guidelines](#)



Criminal history requests

The Law Enforcement System (sometimes referred to as the "Wanganui Computer") holds information about your criminal history and is managed by the Department of Courts. They have information on how to request a copy of your own record.

For information about other peoples criminal history contact the Department for Courts Privacy Officer, telephone 64-4-918 8800 or fax 64-4-918 8820 or by writing to them at PO Box 2750, Wellington.

The New Zealand Police are often asked for a "Police Clearance Certificate" for working in some overseas countries. Unfortunately we do not produce any documents of this nature. The Licensing and Vetting Service Centre is authorised to check individuals' backgrounds for certain approved organisations.

Vetting for approved organisations

Police carry out vetting only for approved organisations that are responsible for providing care to children, older people and more vulnerable members of society.

Organisations wanting to be approved as users of the Police Vetting service should apply in writing to:

The Manager
 Licencing and Vetting Service Centre
 Office of the Commissioner
 PO Box 3017
 Wellington
 NEW ZEALAND

It is the responsibility of the requesting organisation to maintain the security of the information provided.

Further Information

You can contact the Licensing and Vetting Centre by email, or phone 64-4-474 8879 (staffed 24 hours).

[Top of page](#)

[Home](#) | [Operations](#) | [Resources](#) | [Contact Us](#) | [Site Map](#) | [Search](#) | [Copyright](#)

Safety Tip: Lock the front door if you are in the back garden.

21 August 2002.

Police vetting.

- Issues arising from meeting in Auckland between Joe Green and Blair, Bruce, Annabel & Philippa.

Identification issues.

Police believe it is responsibility of employer to ascertain identity. They pass on possible matches rather than checking that they are genuine matches.

- check only on 2 variables - DOB and name
- considering adding 3rd variable - Drivers License Number.
- don't use address.
- will be pass on info about possible match even if only partial match eg DOB and similar name/initials

This is unsatisfactory.

- Police must also take responsibility for identification:
 - fair process
 - to avoid defamatory claims
 - to update their own records eg individual now known as ...?

The matching algorithm needs to be more robust and/or verification should occur before info is sent to employer.

- e.g. contact the individual & check - default is to send to employer if no response.

Red stamp.

- reasons for it should be given to individual automatically i.e. no need to wait for a request.