

**The impact of photographic identification requirements on people without common photographic documents**

**Officials’ summary of findings**

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**Prepared by Policy, the Department of Internal Affairs**

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**Purpose**

1. This document outlines:

* the findings of work by the Department of Internal Affairs (Internal Affairs) and the Office for Disability Issues (ODI) about the impact of photographic identification requirements on people without common photographic documents; and
* planned actions to address the issue.

**Summary of findings and planned actions**

1. The main findings of work on the impact of photographic identification requirements on people without common forms of photographic documents are the following:

* It is more difficult for people without common forms of photographic identity documents to meet identity verification requirements.
* A key driver for identification requirements is to manage identity-related risks and meet obligations such as Anti-Money Laundering and Countering Financing of Terrorism requirements.

1. Internal Affairs will undertake the following actions:

* Expand communications using the information on its public website about acceptable documents for general identification purposes by the end of 2017.
* Have discussions with private sector organisations about the issuance of a new photographic identity document to make it easier for people without common existing documents to access services.
* Consider its role in determining what acceptable identity documents are and how to continue to make it easier to apply for services by the end of 2019 (when a separate project on digital identity is scheduled to be completed).

**Background**

1. A range of organisations request photographic identification from individuals using their services. Providing photographic identification may be more difficult for people that do not hold photographic documents commonly used for identification purposes, such as a passport or a driver licence.
2. Internal Affairs has a key role in the identity area as it holds range of identity information, provides the online RealMe Identity Verification Service and is responsible for establishing and maintaining the Evidence of Identity Standard. The Standard provides guidance to government agencies on establishing a person’s identity and private sector organisations can also choose to use the Standard when they need to be confident of a person’s identity.
3. In September 2016, the Minister for Disability Issues held discussions with CCS Disability Action on difficulties their members have experienced accessing services due to photographic identification requirements. Other people and groups have also raised this matter with the Minister for Disability Issues and the Minister of Internal Affairs.
4. Following the discussion, the Minister for Disability Issues and the Minister of Internal Affairs directed the ODI and Internal Affairs to look at how this issue impacts the disabled community and consider what can be done to address the issue.
5. The scope of the work expanded to include the impact on other groups that may be less likely to hold common photographic documents (e.g. seniors, people with low   
   socio-economic incomes, and people that have gone through the correction system).

**People without common photographic documents may have more difficulty accessing some services**

1. In June 2017, a cross-agency workshop was held that included representatives from the following disability sector organisations: Blind Citizens NZ, CCS Disability Action, Disabled Person’s Assembly and People First. Representatives were also present from   
   New Zealand Post, Westpac (which is working on initiatives to make banking services more accessible) and Hospitality New Zealand, who issue the Hospitality NZ 18+ card that is commonly used for identification purposes by people without a driver licence or passport (see enclosed information sheet for further information about the 18+ card).
2. Representatives from disability sector organisations stated that some disabled people have had difficulty accessing a range of services, including from banks, purchasing goods on hire purchase, and picking up courier packages. Information from agencies that deal with other groups that may be less likely to hold common photographic documents indicated other people may experience similar difficulties as well.
3. Participants from the disability sector also noted that while the Hospitality NZ 18+ card can be used for identification purposes generally, they were aware of examples where disabled people have experienced difficulties using the card this way. Organisations outside the hospitality sector commonly require two identity documents to verify someone’s identity and sometimes customer service staff do not accept the   
   Hospitality NZ 18+ card. This is despite the fact that under the Evidence of Identity Standard the Hospitality NZ 18+ Card can be used to meet the same identity verification purposes as the New Zealand driver licence.
4. Additionally, some people do not want to use the card, the primary purpose of which is to verify that young people are able to purchase alcohol or enter licensed premises.
5. To address these issues, workshop participants from the disability sector supported the introduction of a new photographic identity document available to most people.

**Businesses require photographic identification to manage internal identity-related risks and to meet legal obligations**

1. Following the workshop, Internal Affairs and ODI engaged with the following business and umbrella groups of businesses that require photographic identification: Westpac, Retail New Zealand, the Financial Services Federation New Zealand, and the Pharmacy Guild.
2. The Pharmacy Guild advised that photographic identification is required in some situations to ensure only the correct person is provided medication (e.g. when collecting a controlled substance). The Guild also advised that their members should accept the Hospitality NZ 18+ card for this purpose.
3. The other umbrella groups advised that photographic identification is required in the financial sector to manage internal identity-related risks and to meet legal obligations to verify identity. The groups confirmed that the Hospitality NZ 18+ card should be acceptable but people may have to provide an additional identity document. Additionally, the umbrella groups noted that expanded communication from government about available photographic documents could be helpful in ensuring that their members more consistently accept them (including the Hospitality NZ 18+ card).

**A key driver for photographic identification requirements is the Anti-Money Laundering and Countering Financing of Terrorism regime**

1. The key legal obligation in the financial sector for identity verification is the Anti-Money Laundering and Countering Financing of Terrorism regime. It requires businesses to take appropriate measures to guard against money laundering and the financing of terrorism.
2. The Anti-Money Laundering and Countering Financing of Terrorism Amendment Act 2017 will extend the regime to real estate agents, conveyancers, many lawyers, accountants, businesses dealing in expensive goods, and betting on sports and racing. The law will come into effect in stages for different sectors between July 2018 and July 2019.

**Internal Affairs will undertake actions to address the impact of photographic requirements for people that do not have common photographic documents**

1. Internal Affairs and ODI consider action is needed to provide people more accessible ways to meet photographic identification requirements. Actions will be taken over the short, medium and long-term.

*Short-term actions (by December 2017)*

1. Initially the focus will be on increasing awareness through Internal Affairs’ public website about the types of documents (photographic or otherwise) that can be used for identification purposes. Internal Affairs currently publishes information on its public website about the Evidence of Identity Standard, which includes information about identity documents.[[1]](#footnote-1) The Standard provides good practice guidance for government agencies about establishing and confirming an individual’s identity. Private sector organisations can choose to use the Standard for services that involve identity risk.
2. Internal Affairs has provided advice to umbrella groups representing businesses that require photographic identification (Retail New Zealand, the Financial Services Federation, the Pharmacy Guild, and the Bankers’ Association) to help locate the information. These groups can then refer their members to this information.

*Medium-term actions (from August 2016 and beyond)*

1. In the medium term, the focus would be on providing people with accessible ways to meet photographic identification requirements. Availability of a new photographic document would provide people an additional way to prove their identity and would likely appeal to those who do not already possess other commonly used photographic identity documents. The new photographic document should be:

* universally available/voluntary;
* widely recognised and accepted (as a strong evidence of identity document);
* reasonably priced; and
* convenient to use (i.e. a plastic card that can fit in a wallet).

1. A document accepted for a wide range of purposes would be an attractive target for fraud. Therefore, for the photographic document to be acceptable as strong evidence of identity, the issuing organisation would need to ensure it has robust security features and issuance processes.
2. Internal Affairs will have discussions with the private sector to determine if organisations are able to provide a suitable photographic document. Hospitality New Zealand has expressed an interest in issuing a new photographic document which appeals to a wider range of people.

*Long-term actions (by December 2019)*

1. Internal Affairs will monitor whether the private sector provides a solution and the extent to which this addresses the problem. Internal Affairs will consider if further action is required to stimulate the market. This may include facilitating the certification of available identity documents to give organisations confidence they are acceptable (if this aligns with wider work in Internal Affairs within the identity area).
2. Should the market still not provide a suitable photographic document, Internal Affairs could consider further actions, such as procuring the document and relooking at a government-issued document.

1. Information about the Evidence of Identity Standard and identity documents that can be used for Evidence of Identity purposes is available at:  
   www.dia.govt.nz/diawebsite.nsf/wpg\_URL/Resource-material-Evidence-of-Identity-Standard-Index?OpenDocument [↑](#footnote-ref-1)