

Identity Verification Policy

Purpose and scope. This policy describes how we verify learner identity to safeguard the integrity of assessment and certification for Ofqual-regulated qualifications and to prevent malpractice and maladministration. It applies to all learners, applicants and relevant staff/contractors.

Regulatory context

We implement proportionate controls to:

- take all reasonable steps to prevent malpractice and maladministration and to manage incidents appropriately;
- maintain suitable arrangements with centres and third parties, including processors;
- notify Ofqual of any adverse effects where required.

Lawful basis (UK GDPR)

- Legitimate interests in securing assessment integrity, preventing fraud and meeting awarding-body obligations;
- Contract (where applicable) to deliver and award qualifications.

We do not store biometric templates. Our identity provider (Stripe) performs liveness/face-match and returns a verification result and limited document fields. We process the result and those limited fields under the bases above.

Data we collect (data minimisation)

Automated route (Stripe Identity): verification status (pass/fail), session ID, timestamp, and — where provided — verified outputs such as full name, date of birth, document type/issuing country and truncated document number.

Manual route: images of the identity document (photo page) and a live selfie, plus full name, date of birth, email and course.

How verification works

Automated: Learner completes document + selfie through Stripe Identity (live capture and face-match). Access to assessment activities remains gated until the status is verified.

Manual fallback: Learner submits ID image(s) and a live selfie; a trained staff member compares and records a decision. Reasonable adjustments are available on request.

Processors and transfers

Stripe acts as our processor for identity verification. Personal data may be processed outside the UK under appropriate safeguards. See Stripe's privacy and security documentation.

Retention

Verification result + minimal audit log: retained for the period of study and up to six (6) years after the last certification outcome, unless a longer period is legally required or for ongoing investigations.

Manual uploads (images): kept only until the manual decision is recorded (no longer than 90 days), then securely deleted.

Security and access control

Access is role-based and logged; files are encrypted in transit and at rest; incidents are handled under our Data Breach Response Plan and related policies.

Decisions and appeals

Decisions are not solely automated. Learners may request manual review and may appeal under our Appeals & Complaints Policy. Suspected malpractice is handled under our Assessment Malpractice & Maladministration Policy.

Learner rights

Learners can exercise UK GDPR rights (access, rectification, erasure, restriction, objection) by contacting us. Where erasure conflicts with regulatory record-keeping, we will explain any limits.

Related policies

Privacy Policy · Data Retention Schedule · Assessment Malpractice & Maladministration Policy · Remote Assessment & Invigilation Policy · Appeals & Complaints Policy · Equality, Diversity & Inclusion Policy · Safeguarding Policy · Cookies Policy · Records Management Policy

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Session Cookies

We use a number of session cookies to provide functionality including, but not limited to, remembering who you are when you have logged into our website(s) or learning systems, to identify you when you move from one 4 TEFL system to another, to greet you by name on screen, to optimise the effectiveness of our web servers and to remember the items you have put into our shopping basket.

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If these cookies are blocked or disabled then much of the functionality of our systems will be broken.

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If these cookies are blocked or disabled then our systems will still be usable, but the user experience will be severely degraded.

DoubleClick (Google)

This cookie is used on a small number of pages on the 4 TEFL website to track the effectiveness of our Google Adwords and Google Sponsored Link advertising.

For more information on how to permanently opt-out of DoubleClick placing this cookie on your computer visit <http://www.google.com/policies/privacy/ads/#toc-optout> or install the Google Advertising Cookie Plugin for your browser <http://www.google.com/ads/preferences/plugin/>

Social network cookies

Some pages on our website(s) contain social network 'share' or 'like' buttons. The social network may set a cookie (or cookies) on your PC when you click on one of these buttons.

In order to implement these buttons on our website(s) we use code which is hosted by the relevant social network. If you are a member of some of these networks they may use this code to track that you have visited our website(s) whether you click the buttons or not.

4 TEFL does not control these cookies or the underlying code. You should check the privacy statement of the relevant social network before clicking them and/or to find out how they track their members' behaviour using these elements and how to opt out of this functionality

This policy has been approved & authorised by:

James Ruswel
Quality Assurance
25 August 2025

A handwritten signature in black ink, appearing to read 'James Ruswel'.