

## **PASS 1:2022**

# **Requirements for Identity and Age Verification**

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# Introduction

The Proof of Age Standards Scheme (“PASS”) is the United Kingdom’s national Proof of Age Accreditation Scheme, endorsed by the Home Office, the National Police Chiefs’ Council (NPCC), the Security Industry Authority (SIA) and law enforcement officers, such as Trading Standards.

The PASS Scheme is operated by a Community Interest Company providing accreditation to suppliers of Proof of Age Services in the UK.

The Accredited Providers are assessed against the standards set out in:

- PASS 0 – General Principles and Definitions
- PASS 1 – Requirements for Identity and Age Verification
- PASS 2 – Requirements for e-ID Validation Technology
- PASS 3 – Requirements for Data Protection, Privacy and Security
- PASS 4 – Requirements for Proof of Age Card Design and Construction
- PASS 5 – Requirements for Digital Presentation of Proof of Age

All Accredited Providers are required to comply with PASS 0:2022, PASS 1:2022, PASS 3:2020 and any relevant PASS Standards applicable to their business operations.

All Accredited Providers are required to comply with the latest version of the PASS Standards (indicated by the year of issue), subject to any transitional arrangements agreed by the PASS Standards Group.

The PASS Standards are assessed by qualified, competent auditors appointed by PASS to ensure that accredited providers reach and continue to operate to the requirements of the PASS Standards. This means that providers of age restricted goods, content and services can be confident in accepting cards or digital proof of age bearing the PASS hologram or digital mark, safe in the knowledge that the scheme is supported by the police, Trading Standards and a wide range of trade bodies.

# Contents

Introduction .....	2
Contents.....	3
1. Scope.....	4
2. Normative References .....	5
3. Terms and definitions .....	6
4. Individual Applications with Current Photographic Identification .....	7
<i>Acceptable forms of photographic identification</i> .....	7
<i>Verification of Applications with Current Photographic Identification</i> .....	8
<i>Referees</i> .....	8
5. Individual Applications with Non-Photographic Identification.....	9
<i>Acceptable forms of non-photographic identification</i> .....	9
<i>Verification of Applications with Non-Photographic Identification</i> .....	9
<i>Referees</i> .....	10
<i>Verification of Referees</i> .....	12
6. Individual Applications with No Existing Identification .....	14
<i>Acceptable forms of non-photographic identification</i> .....	14
<i>Verification of Approved Staff</i> .....	15
7. Bulk Applications from Approved Institutions.....	17
<i>Arrangements with Approved Institutions</i> .....	17
<i>Process for Applications from Approved Institutions</i> .....	17
8. Photograph Standards .....	19
<i>General Requirements for Photographs</i> .....	19
9. Name Standards.....	21
<i>General Requirements for Names</i> .....	21
About PASS.....	22

# 1. Scope

The Proof of Age Standards Scheme (PASS) Standards are applicable to any Proof-of-Age Card or Digital Proof of Age provider that wishes to operate under the PASS Scheme and have access to use of the PASS registered Trade mark.

This part of the PASS Standards:

- establishes minimum verification criteria for applications for PASS cards and digital proof of age;
- establishes methods for verification for:
  - o individual applications with photographic identification;
  - o individual applications with non-photographic identification;
  - o individual applications with no existing identification;
  - o bulk applications from approved institutions;
- specifies the procedures, where appropriate for referees or approved staff supporting an application;
- specifies the requirements for 'passport quality photographs';
- specifies the requirements for name standards.

PASS 0 establishes the general principles applicable to all PASS Accredited Providers, including common terms and definitions used throughout this PASS Standard.

## 2. Normative References

The normative references in PASS 0 are relevant to this standard and, in addition, the following are also relevant:

ISO/IEC 19794-5:2011 + A2:2015 Information Technology – Biometric data interchange formats – Part 5: Face image data.

Home Office GPG45 Guidance on Identity Proofing.

PRADO Database ([PRADO - Public Register of Authentic travel and identity Documents Online](#)).

*[International Civil Aviation Organisation \(ICAO\) Doc 903 – Machine Readable Travel Documents, 7<sup>th</sup> Edition, 2013 – Part 3: Specifications Common to all Machine Readable Travel Documents.](#)*

## 3. Terms and definitions

In this document:

“**shall**” indicates a requirement

“**should**” indicates a recommendation

“**may**” indicates a permission

“**can**” indicates a possibility or a capability

***GUIDANCE NOTES** are shown in italic text and are intended to assist the reader with understanding provisions.*

When referring to the PASS Standards, refer to the PASS Standard, followed by the year of issue, followed by the provision – such as **PASS 0:2020 4.3.2**.

The terms and definitions established in PASS 0 apply to this standard and all PASS Standards.

## 4. Individual Applications with Photographic Identification

### *Acceptable forms of photographic identification*

- 4.1 An Applicant can use one of the following forms of valid photographic identification to support their application:
- (a) a PASS card (including any PASS card issued by any Accredited Provider);
  - (b) a Passport (UK or International);
  - (c) a Photocard Driving Licence (UK or European);
  - (d) a European Identity Card;
  - (e) a Biometric Immigration Document bearing a photograph;
  - (f) a Ministry of Defence Form 90 (Defence Identity Card) subject to additional evidence of the applicant's first name.
- 4.2 An Accredited Provider shall assess the validity of the photographic identification submitted in support of the application in order to comply with the requirements in PASS 0 4.4 (confident so they are sure), including assessing that the photograph to be assigned to the PASS card or digital proof of age is a true likeness of the photograph on the supporting document. An expired photographic identification submitted shall be acceptable provided the photograph is not so old as to mean that the Accredited Provider cannot comply with the requirements in PASS 0 4.4 (confident so they are sure).
- 4.3 An Accredited Provider shall demonstrate knowledge of, and be capable of identifying, the correct markings and security features on a supporting photographic identification.
- 4.4 An Accredited Provider shall perform a visual check on any UK or EU issued identity document, where necessary by reference to the PRADO Database ([PRADO - Public Register of Authentic travel and identity Documents Online](#)).
- 4.5 An Accredited Provider shall use a suitably secure and recognised document-checker database to carry out a visual check of any non-UK or non-EU documents.



- 4.6 An Accredited Provider or any sub-contractor acting on their behalf that utilises automated document scanning and checking services shall comply with the requirements of PASS 2 - Requirements for e-ID Validation Technology.

### *Verification of Applications with Photographic Identification*

- 4.7 An Accredited Provider shall ensure that the extraction of attribute data from the identification document is accurate.
- 4.8 The data extraction shall include triangulation of at least three data points on the identity document, with the claimed identity provided by the applicant.

*Triangulation involves, for instance, checking that the date-of-birth on the passport matches the date-of-birth in the machine readable zone (or near field communication data on a biometric passport) having appropriate cognisance of the check digits with the claimed date of birth submitted by the applicant.*

- 4.9 An Accredited Provider shall ensure that the data capture of any date-of-birth is accurately converted from the source document to the DD-Mon-YYYY format.

*Accredited Providers should particularly note the practice in many international jurisdictions for the date to be in the format MM-DD-YY which can lead to transposition errors.*

- 4.10 An Accredited Provider shall be confident so that they are sure [PASS 0, 4.4] that:
- (a) the photograph supplied in support of the application is a true likeness of the applicant as shown on their photographic identification document;
  - (b) the photograph supplied in support of the application has been taken within the six calendar months prior to the date of application.

### *Referees*

- 4.11 An Accredited Provider is not required to obtain a referee where the application is supported by valid photographic identification unless an unresolved contra-indicator is present [PASS 0, 3.13]. If a contra-indicator is present, an Accredited Provider may determine that a method of resolving that contra-indicator is to seek a referee.

## 5. Individual Applications with Non-Photographic Identification

### *Acceptable forms of non-photographic identification*

- 5.1 An Applicant can use one of the following forms of valid non-photographic identification to support their application:
- (a) a birth certificate;
  - (b) an NHS registration card;
  - (c) a UK Border Agency or Home Office document;
  - (d) a criminal records certificate issued by the Disclosure and Barring Service or Disclosure Scotland;
  - (e) a gender recognition certificate;
  - (f) any official document issued by a UK public authority that states a full name and date of birth.
- 5.2 An Accredited Provider shall assess the validity of the non-photographic identification submitted in support of the application in order to comply with the requirements in PASS 0, 4.4 (confident so they are sure).
- 5.3 An Accredited Provider shall demonstrate knowledge of, and be capable of identifying, the correct markings and security features on a supporting non-photographic identification.
- 5.4 An Accredited Provider or any sub-contractor acting on their behalf that utilises automated document scanning and checking services shall comply with the requirements of PASS 2 - Requirements for e-ID Validation Technology.

### *Verification of Applications with Non-Photographic Identification*

- 5.5 An Accredited Provider shall ensure that the extraction of attribute data from the identification document is accurate.

- 5.6 The data extraction shall include triangulation of at least three data points on the identity document, with the claimed identity provided by the applicant.

*Triangulation involves, for instance, checking that the date-of-birth on the birth certificate matches the claimed date of birth submitted by the applicant and is confirmed by a referee.*

- 5.7 An Accredited Provider shall ensure that the data capture of any date-of-birth is accurately converted from the source document to the DD-Mon-YYYY format.

*Accredited Providers should particularly note the practice in many international jurisdictions for the date to be in the format MM-DD-YY which can lead to transposition errors.*

### *Referees*

- 5.8 An Accredited Provider shall obtain from the applicant an acceptable referee who shall be able to confirm that:

- (a) they meet the criteria for an acceptable referee;
- (b) the photograph supplied in support of the application is a true likeness of the applicant;
- (c) the photograph supplied in support of the application has been taken within the six calendar months prior to the date of application;
- (d) they have no reason to believe that the name and date of birth provided by the applicant are not correct;
- (e) they consent to be contacted;
- (f) they understand that providing false information in support of an application is a criminal offence;
- (g) they are not related to, in a relationship with or living with, the applicant.

- 5.9 A referee is an acceptable referee if:

- (a) they work or worked in a recognised profession or are a person of good standing in their community; and
- (b) they have no family or personal relationship with, or live with, the applicant (including that of guardian or foster carer).

- 5.10 In 5.9 (a) a recognised profession includes:

- (a) accountant
- (b) airline pilot
- (c) articulated clerk of a limited company
- (d) assurance agent of a recognised company
- (e) bank/building society official
- (f) barrister
- (g) chairman/director of a limited company
- (h) chiropodist
- (i) commissioner for oaths
- (j) councillor, e.g. local or county
- (k) civil servant (permanent)
- (l) dentist
- (m) director/manager/personnel officer of a VAT-registered company
- (n) engineer – with professional qualifications
- (o) financial services intermediary, e.g. a stockbroker or insurance broker
- (p) fire service official
- (q) funeral director
- (r) insurance agent (full time) of a recognised company
- (s) journalist
- (t) Justice of the Peace
- (u) legal secretary – fellow or associate member of the Institute of Legal Secretaries and PA's
- (v) licensee of a public house
- (w) local government officer
- (x) manager/personnel officer of a limited company
- (y) member, associate or fellow of a professional body
- (z) Member of Parliament (including the Parliaments of devolved administrations)
- (aa) Merchant Navy officer
- (bb) minister of a recognised religion – including Christian Science
- (cc) nurse – registered with the Nursing and Midwifery Council
- (dd) officer of the armed services
- (ee) optician
- (ff) paralegal – certified paralegal, qualified paralegal or associate member of the Institute of Paralegals
- (gg) person with honours, e.g. an OBE or MBE
- (hh) pharmacist
- (ii) photographer – professional
- (jj) police officer

- (kk) Post Office official
- (ll) president/secretary of a recognised organisation
- (mm) Salvation Army officer
- (nn) social worker
- (oo) solicitor
- (pp) teacher, lecturer
- (qq) trade union officer
- (rr) travel agent – qualified
- (ss) valuer or auctioneer – felloes and associate members of the incorporated society
- (tt) Warrant Officers and Chief Petty Officers

5.11 In 5.9 (a) a person of good standing in the community includes a person who:

- (a) enjoys a good reputation in the community;
- (b) has credentials that can be checked; and
- (c) would have something to lose by wrongly supporting a false application.

*Examples of persons of good standing in the community may include Scout or Guide Leaders, Church Wardens, NHS volunteers and charity workers or similar activities.*

5.12 In 5.9 (b) a personal or family relationship includes any person who is related by birth or by marriage and is a spouse, son or daughter (including adopted), parent or grandparent (including by adoption), cousin, aunt or uncle, or is a person that is in a relationship with the applicant or living with the applicant.

*A house sharing arrangement (even if there is no personal or family arrangement between the occupants) would be regarded as living with the applicant.*

*Second cousins, great aunts and great uncles are not considered to be part of a family relationship (provided they meet the other requirements for being a referee).*

### *Verification of Referees*

5.13 Accredited Providers shall contact the referee provided for all applications supported by non-photographic identification.

5.14 Accredited Providers shall be satisfied so that they are sure [PASS 0, 4.4] that the referee is the person that they claim to be and that they meet the requirements to be a referee.

*Accredited Providers may seek to do this by asking for evidence of professional registration or otherwise obtaining evidence of their professional standing. This may include publicly available websites confirming their professional standing.*

- 5.15 Contacting the referee may include contacting them at home, but Accredited Providers shall be satisfied so that they are sure [PASS 0, 4.4] that the referee meets the requirements to be a referee.
- 5.16 Contacting the referee may include any method of contact, including electronic communications, verification processes contained in an app or device, telephone contact or face-to-face contact or enrolment.
- 5.17 On contacting the referee, Accredited Providers shall determine and record that:
- (a) the referee meets the criteria for an acceptable referee;
  - (b) the photograph supplied in support of the application and countersigned by the referee is a genuine counter-signatory and is a true likeness of the applicant;
  - (c) the photograph supplied in support of the application has been taken within the six calendar months prior to the date of application;
  - (d) the referee has no reason to believe that the name and date of birth provided by the applicant are not correct;
  - (e) the referee understands that providing false information in support of an application is a criminal offence;
  - (f) the referee is not related to, in a family or personal relationship with or living with, the applicant.
- 5.18 In 5.17 (b) a counter-signature may be obtained by electronic signature and may form part of an app or system designed to enable electronic applications.
- 5.19 In 5.17 (f) a family or personal relationship has the same meaning as in 5.12.
- 5.20 The management of the referee's consent, contact information and data shall be conducted in accordance with PASS 3 – Requirements for Data Protection, Privacy and Security.

## 6. Individual Applications with No Existing Identification

### *Acceptable forms of application with no existing identification*

- 6.1 An Applicant can submit an application without any supporting identification documentation if their application is supported by an approved member of staff with personal knowledge of that applicant and who is able to confirm their full name and date of birth by reference to an approved data source.
- 6.2 In 6.1 an approved member of staff includes:
- (a) an employee or authorised agent of a PASS Accredited Provider with access to an approved data source;
  - (b) an employee of any UK public authority with access to any approved data source;
  - (c) an employee of any organisation with access to an approved data source of that organisation.

*The approved member of staff still needs to have personal knowledge of the applicant.*

- 6.3 In 6.1 an approved data source includes:
- (a) the records of a PASS Accredited Provider;
  - (b) the records of a local education authority (including the Learning Records Service);
  - (c) the patient records of the National Health Service;
  - (d) the client records of a local authority, including social services records;
  - (e) the offender records of a prison, probation or offender management service;
  - (f) the records of a bank or building society provided they have been established in accordance with the requirements for customer due diligence under the Money Laundering Regulations 2017;
  - (g) the records of a solicitor or legal professional provided they have been established in accordance with the requirements for customer due diligence under the Money Laundering Regulations 2017;
  - (h) the records of citizens held by the Department for Work and Pensions;
  - (i) the records of personnel of any public authority;

- (j) the records of personnel of any employer that employs more than 250 employees and is, therefore, subject to the higher accountability obligations of the Companies Act 2006, including an obligation to confirm the identity of all of their employees.

6.4 An Accredited Provider shall assess the validity of the information submitted in support of the application in order to comply with the requirements in PASS 0, 4.4 (confident so they are sure).

### *Verification of Approved Staff*

6.5 Accredited Providers shall contact the approved staff for all applications that are not supported by identification documents.

6.6 Accredited Providers shall be satisfied so that they are sure [PASS 0, 4.4] that the approved member of staff is the person that they claim to be and that they meet the requirements to be an approved member of staff.

*Accredited Providers may seek to do this by asking for evidence of employment with an organisation that has access to an approved data source. This may include publicly available websites confirming their professional standing. Accredited Providers may also seek verification of work address, work phone number and work email address (i.e. not info@ or contact@ addresses).*

6.7 Contacting the approved member of staff may include contacting them at home, if they work from home, but Accredited Providers shall be satisfied so that they are sure [PASS 0, 4.4] that the member of staff meets the requirements to be an approved member of staff.

6.8 Contacting the approved member of staff may include any method of contact, including electronic communications, verification processes contained in an app or device, telephone contact or face-to-face contact or enrolment.

6.9 On contacting the approved member of staff, Accredited Providers shall determine and record that:

- (a) the member of staff meets the criteria for an approved member of staff;
- (b) the photograph supplied in support of the application and countersigned by the approved member of staff is a genuine counter-signatory and is a true likeness to the applicant;



- (c) the photograph supplied in support of the application has been taken within the six calendar months prior to the date of application;
  - (d) the approved member of staff has no reason to believe that the name and date of birth provided by the applicant are not correct;
  - (e) the approved member of staff understands that providing false information in support of an application is a criminal offence;
  - (f) the approved member of staff is not related to, in a personal or family relationship with or living with, the applicant.
- 6.10 In 6.9 (b) a counter-signature may be obtained by electronic signature and may form part of an app or system designed to enable electronic applications.
- 6.11 In 6.9 (f) a family or personal relationship has the same meaning as in 5.12.
- 6.12 The management of approved members of staff consent, contact information and data shall be conducted in accordance with PASS 3 – Requirements for Data Protection, Privacy and Security.

## 7. Bulk Applications from Approved Institutions

### *Arrangements with Approved Institutions*

- 7.1 An Accredited Provider may enter into a formal agreement with an approved institution to process bulk applications for PASS Cards.
- 7.2 An approved institution includes:
- (a) a PASS Accredited Provider with access to an approved data source;
  - (b) any UK public authority with access to any approved data source;
  - (c) any organisation with access to an approved data source of that organisation.
- 7.3 An approved data source has the meaning set out in 6.3.
- 7.4 In 7.1, a formal agreement shall include:
- (a) the legal identity of the approved institution;
  - (b) a lead contact within the approved institution who is ultimately responsible for the application process;
  - (c) a requirement to only provide data from an approved data source if the approved institution is confident so that they are sure that it provides a genuine indication of the date of birth, age, name and photograph of the applicant;
  - (d) a requirement for data processing in accordance with the requirements set out in PASS 3 – Requirements for Data Protection, Privacy and Security;
  - (e) a list of approved members of staff of the approved institution that may submit bulk applications.

### *Process for Applications from Approved Institutions*

- 7.5 An approved institution shall submit bulk applications in a format determined by the Accredited Provider which shall include as a minimum:
- (a) the identity of the approved institution;

- (b) the signature (which can be an electronic code) of the approved member of staff;
  - (c) the approved data source used to verify the identity of each applicant;
  - (d) the name and date of birth of each applicant;
  - (e) a photograph of each applicant;
  - (f) an attestation that the information provided on each line of the application is correct to the best of their knowledge and belief, that the photograph is a true likeness of the individual applicant and that the approved member of staff has no reason to believe that the information provided is incorrect;
  - (g) that they understand that providing false information is a criminal offence.
- 7.6 Accredited Providers shall be satisfied so that they are sure [PASS 0, 4.4] that the approved member of staff is a person that is nominated as an approved member of staff in accordance with the requirements of 7.4 (e).
- 7.7 On receiving a bulk application, Accredited Providers shall determine and record that:
- (a) the approved member of staff is a person that is nominated as an approved member of staff in accordance with the requirements of 7.4 (e);
  - (b) the information required to be submitted by 7.5 is complete;
  - (c) the photograph supplied in support of the application has been taken within the six calendar months prior to the date of application.

## 8. Photograph Standards

### *General Requirements for Photographs*

- 8.1 An Accredited Provider shall obtain a photograph of each PASS Card applicant so that the Accredited Provider is confident so that they are sure [PASS 0, 4.4] the photograph is a true likeness of the applicant to 'passport quality standards'.
- 8.2 The photograph shall be a full frontal image captured in accordance with ISO/IEC 19794-5:2011 + A2:2015 Information Technology – Biometric data interchange formats – Part 5: Face image data.
- 8.3 The image shall be in a pose angle of not more than 5 degrees in pitch and yaw, and not more than 8 degrees in roll with an expression that is neutral, taken in adequate and evenly distributed lighting and absent from hot spots and specular reflections.
- 8.4 The image may include eye glasses, provided the eye pupils and irises are visible and there are no lighting artefacts or flash reflections on the glasses. Images with 'red eye' are not permitted. Eye patches are only permitted on verified medical grounds.
- 8.5 The image may allow for the applicant wearing a head covering for medical or religious grounds, but the full face, including eyes, nose, mouth and chin shall be visible.
- 8.6 The image shall, as far as reasonably practicable, be free from radial distortion of the camera lens and taken with a pixel aspect ratio of 1:1. The use of filters, image enhancement, blemish elimination or other similar adjustments commonly available in smart phones shall not be used.  
  
*Radial distortion is a 'fish eye' effect caused by wide angle camera lens (including those in smart phones taking 'selfies') that causes the nose to appear larger than the surrounding face. The effect cannot be entirely eliminated but should not be perceptible on human examination of the photograph.*
- 8.7 Accredited Providers shall have regard to the needs of applicants undertaking gender transitioning, whilst seeking to maintain the integrity and reliability of the PASS Card or Digital Proof of Age as a means of proving age.

- 8.8 Accredited Providers shall have flexibility to make reasonable and necessary adjustments in relation to photo standards for any applicants that:
- (a) are under 12 years of age;
  - (b) are living with a physical or mental impairment that makes taking photographs difficult;
  - (c) are living with facial disfigurement or physiological factors that affect the appearance of their face.
- 8.9 The image may be subject to post-acquisition processing only to:
- (a) crop the image whilst maintaining the original aspect ratio;
  - (b) undertake in plain rotation of the image to improve the pose angle;
  - (c) compress the image file size;
  - (d) remove a non-contrasting background to the image of the face (i.e. to white out the background) to provide for background segmentation.
- 8.10 *Further guidance on the acceptability of 'passport quality photographs' is given at paragraph 3.9.1 of the [International Civil Aviation Organisation \(ICAO\) Doc 903 – Machine Readable Travel Documents, 7<sup>th</sup> Edition, 2013 – Part 3: Specifications Common to all Machine Readable Travel Documents](#).*

## 9. Name Standards

### *General Requirements for Names*

- 9.1 An Accredited Provider shall obtain the name of each PASS Card applicant so that the Accredited Provider is confident so that they are sure [PASS 0, 4.4] it is the true name of the applicant.
- 9.2 The name is in two parts:
- (a) a primary identifier – which could be the surname, family name, maiden name, married name or main name; and
  - (b) a secondary identifier – which could be the forename(s), familiar names, given names or other secondary names.
- In some cases, the primary and secondary identifiers cannot be separated, in which case that name is treated as a primary identifier.
- 9.3 Prefixes and suffixes including titles, professional and academic qualifications, honours, awards and hereditary status shall not be used unless they are legally a part of the name.
- 9.4 Numeric characters shall only be used in roman numerals (i.e. Peter Smith III) where that is a legal naming convention of the state of origin of the applicant.
- 9.5 Characters shall be Latin-based. Where names contain non-Latin characters (such as Cyrillic or Arabic characters), these shall be subject to transliteration.
- Guidance on suitable transliteration of names can be found in section 6 of the [International Civil Aviation Organisation \(ICAO\) Doc 903 – Machine Readable Travel Documents, 7<sup>th</sup> Edition, 2013 – Part 3: Specifications Common to all Machine Readable Travel Documents](#).*
- 9.6 Names should be recorded and displayed in full when shown on a PASS Card or Digital Proof of Age, but may be shortened where necessary.
- 9.7 Accredited Providers shall have regard to the needs of applicants undertaking gender transitioning, whilst seeking to maintain the integrity and reliability of the PASS Card of Digital Proof of Age as a means of proving age.

# About PASS

The PASS Scheme is operated by a Community Interest Company providing accreditation to suppliers of Proof of Age Cards in the United Kingdom. The Accredited Providers are assessed against strict standards by qualified auditors to ensure that they operate to the highest standards. Sellers of age restricted products can be confident in accepting Cards or Digital Proof of Age with a PASS hologram or dynamic graphic, safe in the knowledge that the Scheme is supported by the police, Trading Standards and a wide range of trade bodies.

## Assurance

Every card or digital proof of age that carries a PASS hologram or dynamic graphic will have been issued by a provider who has been through a stringent application and accreditation process.

## Confidence

Production of a PASS hologrammed card or digital proof of age at the point of sale affords retailers and their staff the confidence of knowing that it is a trusted and secure form of identification.

## Reliability

The unique PASS hologram is a registered Trademark, making it a criminal offence to manufacture cards or digital proof of age service that have a mark similar to the PASS one.

## Support

Possession of a PASS accredited card or digital proof of age demonstrates that the holder's age and personal details have been verified by an Accredited Provider and that they are who they say they are!

# PASS

PASSCo C.I.C.

[www.pass-scheme.org.uk](http://www.pass-scheme.org.uk)