



Good practice guidance

For the recording and use of personal names

Version 2b Final

August 2014

Introduction

This Good practice guidance for the recording and use of personal names should be used by organisations wishing to improve their understanding of personal names and the quality of their personal name data.

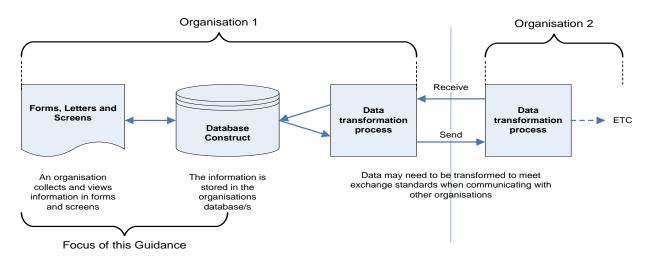
With the increase in communications and interoperability between organisations, especially government agencies, there is an increased need for a common language and approach to data. A brief investigation of the recording of names, amongst key agencies, revealed an inconsistent understanding of names and a variety of practices relating to their treatment, especially around Married names. These Inconsistent approaches and understanding of names provide opportunities for fraudsters to create false or multiple identities, on which fraud is invariably committed. Each instance costs the public in taxes, fees, interest rates etc.

The flow on effect of organisations trying to address name issues independently has resulted in-

- difficulty establishing uniqueness within and across customer databases,
- poor match success when required to compare data with other organisations,
- systems and processes that prevent a person's right to be addressed correctly and/or in the manner of their choosing.

Many agencies expressed a wish for guidance in the area of names and by providing a common approach to the use of names these issues can be addressed. Agreeing to this approach also means that services provided by authoritative name data sources¹ such as the Confirmation Service, RealMe® and VisaView will be able to better support organisations and customers.

In a typical organisation, customers and frontline staff enter and view name information in various forms, letters, reports and screens. This information is stored, often in different ways, in databases behind the scenes. From time to time organisations may extract information for transfer, exchange, or matching (as allowed) with other organisations. At that time either the organisations have an agreed format (or matching formats) for the data or the data is transformed into a standard exchange format². This is simplistically shown in the diagram below.



This guidance is primarily aimed at the designers of front end services, however also contains useful information for those designing supporting database structures. Following this guidance will enable organisations to:

- Communicate with customers in a person centric way
- Increase internal data quality and administrative efficiency
- Enable greater external compatibility and interoperability (where appropriate³) with other organisations.

¹ These are organisations that establish identity on a national authoritative basis. In New Zealand there are two: Department of Internal Affairs for NZ citizens and Department of Labour (Immigration New Zealand) for non-NZ citizens.

² The *Data Formats for Identity Records <u>Standard</u>* is the data exchange standard for Names in New Zealand.

³ Data must only be exchanged or matched with due consideration of the Privacy Act and/or where permitted by law.

Guiding principles

The advice provided in this document is designed to meet some fundamental requirements of customers and organisations. These requirements can be expressed as a series of guiding principles.

Principle 1 Customers are entitled to be referred to in correspondence and verbally by the name of their choice.

Provided the purpose is not to deceive, this right is enshrined in common law. This principle includes not having their name altered or bent to fit poorly designed systems and being entitled to use different names with different organisations⁴.

Principle 2 *Organisations*, where required, can establish the uniqueness of a customer, regardless of the name used.

For some organisations it is important to know that they are dealing with a single customer no matter what name they wish to be known by. This includes the ability to detect when an application in a different or new name relates to an existing customer.

Principle 3 Organisations, when permitted, are able to effectively match customers, where a unique identifier is not shared

Where an organisation is permitted to undertake a data match, the success rate and accuracy of matches is high. Improved interoperability and efficiency benefits customers by reducing administration costs and enabling better service provision.

Principle 4 Organisations, where required, use the correct name

Where a certain name is specified by legislation or policy, an organisation needs to be assured they have it correctly recorded (includes the name itself and the type of name) e.g. for the issuing of certain notices or legal papers.

What follows is a recommended approach to name attributes, categories and types that support these principles.

⁴ This does not preclude an organisation requesting or applying other conditions on names for the purposes of identity establishment

What are names?

The Oxford English Dictionary⁵ defines a name as: 'A proper noun; a word or phrase constituting the individual designation by which a particular person or thing is known, referred to, or addressed.'

Within the <u>Evidence of Identity (EOI) Standard</u>, it is stated that identity attributes include: '...name attributes relating to the identity (e.g. first name, family name)'

Beyond these basic descriptions of names it is also worth noting:

- Personal name attributes or elements may also be made up of one or more words (e.g. Van der Walt, Te Huia etc), therefore in a field where multiple name elements are recorded, how do you tell when one ends and the next begins?
- They can reflect occupation (historic), family lineage, time of birth, region, religion etc.,
 which in turn means :-
- They can be chosen by the individual at any time or assigned by others at a birth or other event.
- They are changeable and may be different in different contexts i.e. a person may use more than one name in society at a given time.
- They can be emotive as they are a core element of personal identity.
- A person has the right (in common law) to be known by any name they wish, provided it
 is not for deceit.

The table below describes the two primary name attributes and three associated attributes.

Attribute	Description
Family name	A name element that identifies the familial group to which the person belongs or identifies as. Preferred term covering Surname and Last name as it is more widely recognised by other nationalities.
Given name/s	Name element/s by which a person is known within a familial group. Term covering First name/s, Middle name/s, Christian name/s, Personal name/s.
	No rank must be applied to the order in which Given names appear. Where systems have a separate field for 'first given name' this should not be used to make any judgement about the Preferred name of a person. Consideration should be given to removing the separation of 'first given name' from 'other given names' in the future.
	Systems should cater for multiple Given names and multiple words in any one i.e. where a field is to have a number of Given names entered a method of separating the names should be implemented e.g. use of commas as in Joy, Tui Moana, Anne SMITH.
Prefix	Some systems separate the prefixes of family names such as St, van, de etc. This is not recommended as it splits the name and further confusion occurs if the family name contains more than two parts as in VAN DER WALT.
Suffix	Jnr, Snr, ordinals (e.g. 3 rd , III), awards (e.g. OBE, MBA). The majority of authoritative data sources do not store 'suffix' separately, therefore storage of this element is up to the business needs of the organisation.
Title	Words that appear before a name for example Mr, Mrs, Ms, Miss, Dr, can also include ranks (e.g. Captain), titles (e.g. Sir, Rev) etc. The majority of authoritative data sources do not store 'title', therefore storage of this element is up to the business needs of the organisation.

⁵ Third edition, June 2003; online version September 2011 Department of Internal Affairs

Name categories

Understanding some key concepts for names, represented by categories will help develop a common language and enable consistent notation of names. The benefits being to aid inter organisation discussion especially around shared customers.

All names fall into one of these two categories.

Category	Description
Official name	A name that can be validated against a NZ authoritative identity data source ⁶ . Names that could qualify for this category come from documents such as NZ identity documents (birth certificates, citizenship certificates and passports) and the majority of overseas passports ⁷ .
Assumed name	Any other name that a person uses providing it is not for the purposes of deceit. These names include Married/Civil Union names, overseas registered names, Preferred names, Aliases, AKAs, CKAs, tribal names, role based names etc

Names can move between these categories. E.g. a name assumed on Marriage/Civil Union does not appear in any register held by Births, Deaths and Marriages, however if a passport is subsequently issued, the name will be able to be validated as an Official name by Passports.

Additionally there are further qualifications that can be made to names in the two categories above which lead to these sub categories.

Sub Category	Description
Anchor name	This represents the first Official name established in New Zealand.
	 At birth - when recorded with Department of Internal Affairs on a birth certificate or citizen by descent certificate or
	At first entry into New Zealand - when recorded with Immigration New Zealand
	As an anchor name it should be in very rare circumstances that this name should ever change. Anchor names are a subset of Official names.
Validated name	This is an Official name that has been checked against its authoritative source and was found to exist.
	It should be noted that, depending on the method used to validate the name, it does not guarantee that the person who has provided the name has not stolen it. Validated names are a subset of Official name and can be indicated using a flag.
False name	Any name that is found to have been used for the purposes of deceit, fraud etc.
	These names will be Assumed names and/or Official names (where stolen) until such time as they are determined to be false.
	Even then, it should be noted that a stolen name could still be a validated Official name, just not in the context of the person who has been claiming it.

It is not necessary for an organisation to record or notate names using these categories but should be aware of them at a conceptual level as they will influence the 'name types' used and various validation processes that may be undertaken.

Department of Internal Affairs

⁶ That is DIA for NZ citizens and DoL (Immigration New Zealand) for non-NZ citizens. It should be noted that not all registers held by these departments are able to be validated against.

⁷ Some overseas issued passports may not have been used to get into New Zealand e.g. dual nationals and therefore will not appear in any authoritative register in New Zealand.

Name types and flags

Where organisations do not, or are not able to, support the notation of name categories then the use of name types (already a collected by many organisations) may give an indication as to the category into which a name may fall.

This guidance does not intend to direct organisation to alter the name types or flags that they currently use to meet their individual business requirements. Rather it comments on known terms and their issues and proposes a consistent approach to their use that supports the guiding principles. This is not a definitive list as organisations may have additional business specific terms.

Name Type Attribute	Comment
Alias	Unless specifically defined by an organisation Alias is an alternative to Also Known As. Due to the darker connotation commonly associated with the term, the latter is preferred. Generally an assumed name
Also Known As (AKA)	Any name that a person may be known by, present or past. Commonly Known As (CKA) is a similar term. Preferential term to Alias (unless specifically separately defined). Generally an assumed name
Birth name	First name registered after birth. New Zealand birth names will be Official names, however birth names registered overseas will only be Official names in New Zealand, if they are names that were used to cross the border or in which citizenship has been granted etc.
Maiden name	Woman's name before first Marriage/Civil Union i.e. Name at birth. While men can assume names on Marriage/Civil Union this term is not used in this context. It is recommended that this name type <u>not</u> be used.
Married/Civil Union name	A name assumed after Marriage/Civil Union, traditionally given name/s + spouse/partner's family name. Names appearing on Marriage and Civil Union Certificates are the names prior to the event. They are not currently validated against authoritative sources, merely recorded as provided. The certificates provide an indication of names used, not that any of the names will qualify as Official names or will be able to be validated as such.
Preferred name	This is a specific instance of an Official or Assumed name at a point in time and could also be implemented as a flag. It is the name a person wishes to be addressed by.
(Name) Source	A code or text representing the source (usually a document) that the name came from e.g. Passport, Drivers Licence etc or could be an organisation. This notation can give an indication of an Assumed or Official name.

An organisation's policy on the acceptance of certain names will be driven by business needs including but not limited to:

- Legislations and regulations
- Compliance with customer due diligence under the Anti-money Laundering and Countering Financing of Terrorism (AML-CFT) Act 2009⁸
- Compliance with the Evidence of Identity (EOI) Standard⁹

This must be balanced with a person's right to use whatever name they wish (provided it is not for the purposes of deceit).

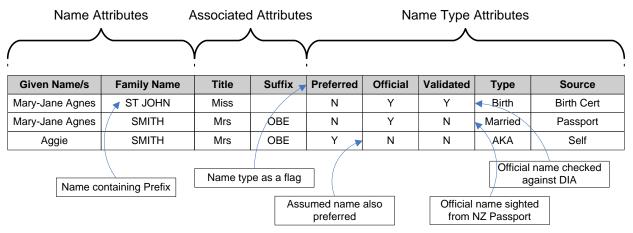
⁸ Link to Anti-money Laundering and Countering Financing of Terrorism website

⁹ Link to Evidence of Identity Standard website

Putting it all together

Example name record

The following diagram is an example of how a customer's name record may look, incorporating the various aspects discussed in this guide.



Establishing identity exists

If an organisation wants to be able to assure itself that a person's identity exists and is living (Objectives A and B of the EOI Standard) then the ability to separate Assumed names from Official names will be an advantage. The ability to validate an Official name against an authoritative source provides confidence that the identity exists and depending on the mechanism used, that the identity is not deceased.

Improving matching

Official names, if recorded correctly from documents and/or successfully validated, will be more likely to match data stored under the same conditions at other organisations than those known to be Assumed names.

Single customer

If an organisation needs to be sure that they have uniqueness within their customer database, without going to the extreme of biometric matching, then the collection of Anchor name (in conjunction with other core identity attributes; date of birth, place of birth and gender) will allow organisations to ensure subsequent registrations by customers do not create duplicate customer records.

Note: Out side the correction of errors there are only three known instances where an anchor name would change, Adoption, Gender reassignment and Witness protection. In all three cases new identities are effectively created, with any links between records restricted by law. An organisation may end up with a duplicate record, for a single person, if they were registered prior to the event. This should be a known anomaly for organisations. In the case of Gender reassignment the person will normally continue their accounts in their new identity having discussed with the organisation (and provided evidence) of the change in details.

Customer's preference for name

The ability to notate a name as a Preferred name (Official or Assumed) supports the customer's own sense of identity and enables the provision of good customer service. When combined, Official name/s support the business need for matching and uniqueness (which in turn reduces the avenues for identity fraud) while Preferred name provides the ability to continue to operate in a customer centric environment.

Related topics

Use of Diacritics, Transliterations and Translations

Specific guidance is yet to be developed regarding the use of diacritics, transliterations and translations. However with the prevalence of passports as identity documents the <u>International Civil Aviation Organisation (ICAO)</u> standard provides a useful guide. Once specific guidance for New Zealand becomes available an appropriate section or reference will be added to this guide.

Name formats

Currently this guidance does not provide advice on specific formats for name data e.g. length, case, etc. preferring to let this be driven by each organisations own business needs. However it should be noted that there are some Standards that should be considered.

The <u>International Civil Aviation Organisation (ICAO)</u> sets formats for travel documents which will influence a large number of the evidential documents, provided by customers, and in turn the information organisations should be able to accept.

The <u>Data Formats for Identity Records Standard</u> is a New Zealand standard for the exchange of data. Each organisation decides whether it stores its data in the data formats specified in this Standard or whether it transforms its data when importing to and exporting from its databases. The Standard is based on the <u>OASIS CIQ</u>¹⁰ Specifications v3.0 (OASIS 2008) which defines a set of specifications and XML schema to represent several types of party-centric information.

In addition a <u>New Zealand Government OASIS CIQ Name Profile</u> has been developed. This work will continue to be monitored for potential impacts.

Organisation for the Advancement of Structured Information Standards (OASIS) - Customer Information Quality (CIQ)

Glossary of other terms

The following glossary lists other terms used within this document that have not been separately defined.

Term	Definition
(name) Attribute	An individual element/part of a name record. Name attributes include Family name, Given name/s, Name type, Title etc. and a wide variety of other values. See also Metadata.
Authoritative identity data source	In New Zealand there are two sources of authoritative identity information: Department of Internal Affairs for New Zealand citizens and Department of Labour (Immigration New Zealand) for non-New Zealand citizens.
(name) Category	High level groups for the conceptual understanding of names.
CIQ v3.0	Customer Information Quality Standard version 3, published by OASIS, on which the <i>Data Formats for Identity Records Standard</i> is based.
Diacritics	Symbols attached to letters of the alphabet to aid in the pronunciation of words.
DVS	Data Validation Service. A service provided by DIA to validate the data on various identity documents.
(name) Element	See Attribute, term used in the CIQ Standard
(name) Flag	A name attribute represented in the form of a flag or indicator that could signal a status e.g. Validated = Y or Preferred = N.
igovt	Current brand name for an online identity information management service that enables an individual to confirm their identity securely when dealing with government service providers on the Internet.
(name) Information	A collection of name attributes that make up one or more name records.
(name) Metadata	A number of various attributes relating to a name that could include (but not limited to), start and end dates, modified date, created date, created by, status etc.
OASIS	Organisation for the Advancement of Structured Information Standards.
Personal name	The amalgam of Given name/s and Family name applying to an individual.
Translation	To make a version from one language or form of words into another. E.g. 'bonjour' becomes 'good day'.
Transliteration	The action or process of transliterating; the rendering of the letters or characters of one alphabet in those of another. E.g. ä becomes ae
(name) Type	A designation for describing the use of a name in different contexts e.g. Birth Name, Married/Civil Union name, Passport name, Citizenship name, Alias, Also known as, Preferred name etc.

Further information

For further information or advice on the use of this guidance contact the Department of Internal Affairs at identity@dia.govt.nz