

Guidance

# ID checking guidelines for DBS standard & enhanced check applications

#### Introduction

The applicant must provide a range of ID documents as part of the DBS check application process. As an employer you must:

- follow the three route ID checking process as outlined
- check and validate the information provided by the applicant on the application form/ continuation sheet
- establish the true identity of the applicant through the examination of a range of documents as set out in this guidance
- make sure the applicant provides details of all names by which they have been known
- make sure the applicant provides details of all addresses where they have lived in the last five years
- check that the application form is fully completed and the information it contains is accurate. Failing to do this can result in delays.

When checking the validity of the documents it is best practice to carry out this examination face to face. Other alternative methods include via a live video link, for example Skype and FaceTime. In both cases you must be in physical possession of the original documents. Any risks identified when using live video must be assessed and mitigated by you if implementing this practice. You must not rely on the inspection of the documents via a live video link or by checking a faxed or scanned copy of the document.

If there are any discrepancies in the information provided by the applicant and/or the identity documents supplied, and fraud is not suspected, please ask the applicant to clarify. If you don't do this it may compromise the integrity of the DBS service and introduce risk to your recruitment or licensing arrangements.

As an employer you must not attempt to amend the application form without the applicant's knowledge and agreement. Doing this will invalidate the declaration by the applicant and may breach data protection legislation.

# What you must do as part of the ID checking process

- you must only accept valid, current and original documentation
- you must not accept photocopies
- you must not accept documentation printed from the internet e.g. internet bank statements
- identity information for the applicant's name, date of birth and address recorded in section A and section B on the DBS application form must be validated
- you should in the first instance, seek documents with photographic identity (e.g. passport, new style driving licence, etc.) and for this to be compared against the applicant's likeness
- all documents must be in the applicant's current name as recorded in section A
- one document must confirm the applicant's date of birth as recorded in section A
- you must ensure that the applicant declares all previous name changes, and
  provides documentary proof to support the change of name. If the applicant is unable
  to provide proof to support the change of name, you should hold a probing discussion
  with the applicant about the reasons why before considering to validate their identity
- you must see at least one document to confirm the applicant's current address as recorded in section B, in accordance with the guidance
- you must provide a full and continuous address history covering the last five years. Where possible you should seek documentation to confirm this address history
- you should cross-match the applicant's address history with any other information
  you have been provided with as part of the recruitment, such as their Curriculum
  Vitae (CV). This can highlight if an address has not been given e.g. if the applicant's
  CV shows that they have worked in Liverpool in the last five years, but the application
  form only shows London addresses, you may wish to question the applicant further
  about this
- a document from each of the groups should be included only once in the document count e.g. don't accept two bank statements as two of the required documents, if they are from the same bank
- you should not accept the foreign equivalent of an identity document if that document is listed as '(UK)' on the list of valid identity documents

The documents needed will depend on the route the application takes. The applicant must try to provide documents from Route 1 first.

It's important to note that a DBS check does not provide evidence of a person's right to work in the UK. You must do a separate check to <u>make sure a job applicant is allowed to work in the UK</u> which also includes roles for voluntary work.

If the applicant isn't a national of the UK or the European Economic Area (EEA) they must <u>use a different route to apply for paid work</u> in the UK. They can use Route 1 for voluntary work.

# Three routes of ID checking

## Route 1

The applicant must be able to show:

- one document from Group 1, below
- 2 further documents from either Group 1, or Group 2a or 2b, below

At least one of the documents must show the applicant's current address.

If the applicant isn't a national of the UK or the EEA and is applying for voluntary work they may need to be fingerprinted if they can't show these documents.

#### Route 2

Route 2 can only be used if it's impossible to process the application through Route 1.

If the applicant isn't a national of the UK or the EEA and is applying for voluntary work they can't use Route 2.

If the applicant doesn't have any of the documents in Group 1, then they must be able to show:

- one document from Group 2a
- 2 further documents from either Group 2a or 2b

At least one of the documents must show the applicant's current address. The organisation conducting their ID check must then also use an appropriate external ID validation service to check the application.

EEA nationals who've been resident in the UK for 5 years or less may need to be fingerprinted if they can't show these documents.

## Route 3

Route 3 can only be used if it's impossible to process the application through Routes 1 or 2.

EEA nationals who've been resident in the UK for 5 years or less can't use Route 3.

For Route 3, the applicant must be able to show:

- a birth certificate issued after the time of birth (UK, Isle of Man and Channel Islands)
- one document from Group 2a
- 3 further documents from Group 2a or 2b

At least one of the documents must show the applicant's current address. If the applicant can't provide these documents they may need to be fingerprinted.

#### **Continuation sheets**

The applicant can <u>download a DBS continuation sheet</u> for additional information they can't fit on the DBS application form.

#### Unusual addresses

The applicant must make sure they fill in the address part of the form correctly if they have an <u>unusual address</u>, for example if they live abroad, in student accommodation or a hostel.

# **Group 1: Primary identity documents**

Document	Notes
Passport	Any current and valid passport
Biometric residence permit	UK
Current driving licence photocard - (full or provisional)	UK, Isle of Man, Channel Islands and EEA. From 8 June 2015, the paper counterpart to the photocard driving licence will not be valid and will no longer be issued by DVLA
Birth certificate - issued within 12 months of birth	UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, for example embassies, High Commissions and HM Forces
Adoption certificate	UK and Channel Islands

# **Group 2a: Trusted government documents**

Document	Notes
Current driving licence photocard - (full or provisional)	All countries outside the EEA (excluding Isle of Man and Channel Islands)
Current driving licence (full or provisional) - paper version (if issued before 1998)	UK, Isle of Man, Channel Islands and EEA
Birth certificate - issued after time of birth	UK, Isle of Man and Channel Islands
Marriage/civil partnership certificate	UK and Channel Islands
Immigration document, visa or work permit	Issued by a country outside the EEA. Valid only for roles whereby the applicant is living and working outside of the UK. Visa/permit must relate to the non EEA country in which the role is based
HM Forces ID card	UK
Firearms licence	UK, Channel Islands and Isle of Man
All driving licences must b	e <u>valid</u> .

# **Group 2b: Financial and social history documents**

Document	Notes	Issue date and validity
Mortgage statement	UK or EEA	Issued in last 12 months
Bank or building society statement	UK and Channel Islands or EEA	Issued in last 3 months
Bank or building society statement	Countries outside the EEA	Issued in last 3 months - branch must be in the country where the applicant lives and works
Bank or building society account opening confirmation letter	UK	Issued in last 3 months
Credit card statement	UK or EEA	Issued in last 3 months
Financial statement, for example pension or endowment	UK	Issued in last 12 months
P45 or P60 statement	UK and Channel Islands	Issued in last 12 months
Council Tax statement	UK and Channel Islands	Issued in last 12 months
Letter of sponsorship from future employment provider	Non-UK or non- EEA only - valid only for applicants residing outside of the UK at time of application	Must still be valid
Utility bill	UK - not mobile telephone bill	Issued in last 3 months
Benefit statement, for example Child Benefit, Pension	UK	Issued in last 3 months
Central or local government, government agency, or local council document giving entitlement, for example from the Department for Work and Pensions, the Employment Service, HMRC	UK and Channel Islands	Issued in last 3 months

Document	Notes	Issue date and validity
EEA National ID card		Must still be valid
Irish Passport Card	Cannot be used with an Irish passport	Must still be valid
Cards carrying the PASS accreditation logo	UK, Isle of Man and Channel Islands	Must still be valid
Letter from head teacher or college principal	UK - for 16 to 19 year olds in full time education - only used in exceptional circumstances if other documents cannot be provided	Must still be valid

# Applicant s who aren't a national of the UK or the European Economic Area (EEA)

An applicant who wants to do paid work and isn't a national of the UK or <u>European</u> Economic Area (EEA) must be able to show:

- one primary document
- 2 supporting documents

If an applicant is unable to provide this documentation they can't submit a DBS check. This is because the right to work in the UK can't be established. They can't use any other route.

Applicants for voluntary work who aren't UK or EEA nationals must use Route 1.

Non-EEA national who are eligible for a DBS check and receiving payment for work, even if it is an allowance e.g. a foster carer must use the paid work route.

However, Route 1 can be used by adult household members:

- in a fostering household
- in a childminding household
- in a host family
- living where 'work with children' takes place e.g. living in a boarding school

#### Documents for non-EEA nationals doing paid work

The documents must be originals, not copies.

At least one of the documents from either the primary or supporting documents lists must show the applicant's current address.

The primary document list contains the range of documents you may accept for a person who has a permanent or temporary right to work in the UK. More detailed information about which document you may accept for right to work purposes, together with examples of what they look like can be found in 'An employer's guide to acceptable right to work documents'.

# **Primary Documents**

A Permanent Residence Card issued by the Home Office to the family member of a national of a European Economic Area country or Switzerland.

A **current** Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder indicating that the person named is allowed to stay indefinitely in the UK, or has no time limit on their stay in the UK.

A **current** passport endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK.

A **current** Immigration Status Document issued by the Home Office to the holder with an endorsement indicating that the named person is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK, **together with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.

A **current** passport endorsed to show that the holder is allowed to stay in the UK and is currently allowed to do the type of work in question.

A **current** Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder which indicates that the named person can currently stay in the UK and is allowed to do the work in question.

A **current** Residence Card (including an Accession Residence Card or a Derivative Residence Card) issued by the Home Office to a non-European Economic Area national who is a family member of a national of a European Economic Area country or Switzerland or who has a derivative right of residence.

A **current** Immigration Status Document containing a photograph issued by the Home Office to the holder with a valid endorsement indicating that the named person may stay in

the UK, and is allowed to do the type of work in question, **together with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.

A Certificate of Application issued by the Home Office under regulation 17(3) or 18A (2) of the Immigration (European Economic Area) Regulations 2006, to a family member of a national of a European Economic Area country or Switzerland stating that the holder is permitted to take employment which is **less than 6 months old together with a Positive Verification Notice** from the Home Office Employer Checking Service.

An Application Registration Card issued by the Home Office stating that the holder is permitted to take the employment in question, **together with a Positive Verification Notice** from the Home Office Employer Checking Service.

A **Positive Verification Notice** issued by the Home Office Employer Checking Service to the employer or prospective employer, which indicates that the named person may stay in the UK and is permitted to do the work in question.

# **Supporting documents**

The applicant must be able to show 2 documents from any of these groups.

# **Group 1**

Document	Notes
Passport	Any current and valid passport
Biometric residence permit	UK
Current driving licence photocard - (full or provisional)	UK, Isle of Man, Channel Islands and EEA
Birth certificate - issued within 12 months of birth	UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, for example embassies, High Commissions and HM Forces
Adoption certificate	UK and Channel Islands

A passport or biometric residence permit can only be used as a supporting document if it's not already been used as a primary document.

# **Group 2a**

Document	Notes	
Current driving licence photocard - (full or provisional)	All countries outside the EEA (excluding Isle of Man and Channel Islands)	
Current driving licence (full or provisional) - paper version (if issued before 1998)	UK, Isle of Man, Channel Islands and EEA	
Birth certificate - issued after time of birth	UK, Isle of Man and Channel Islands	
Marriage/civil partnership certificate	UK and Channel Islands	
Immigration document, visa or work permit (for applicants living and working outside the UK)	Issued by the country where the role's based	
HM Forces ID card	UK	
Firearms licence	UK, Channel Islands and Isle of Man	
All driving licences must be <u>valid</u> .		

# **Group 2b**

Document	Notes	Issue date and validity
Mortgage statement	UK or EEA	Issued in last 12 months
Bank or building society statement	UK and Channel Islands or EEA	Issued in last 3 months
Bank or building society statement (for applicants living and working outside the UK)	Countries outside the EEA	Issued in last 3 months - branch must be located in the country in which the applicant lives and works

Document	Notes	Issue date and validity
Bank or building society account opening confirmation letter	UK	Issued in last 3 months
Credit card statement	UK or EEA	Issued in last 3 months
Financial statement, for example pension or endowment	UK	Issued in last 12 months
P45 or P60 statement	UK and Channel Islands	Issued in last 12 months
Council Tax statement	UK and Channel Islands	Issued in last 12 months
Letter of sponsorship from future employment provider	Non-UK or non-EEA only - valid only for applicants residing outside of the UK at time of application	Must still be valid
Utility bill	UK - not mobile telephone bill	Issued in last 3 months
Benefit statement, for example Child Benefit, Pension	UK	Issued in last 3 months
Central or local government, government agency, or local council document giving entitlement, for example from the Department for Work and Pensions, the Employment Service, HMRC	UK and Channel Islands	Issued in last 3 months
EEA National ID card	-	Must still be valid
Irish Passport Card	Cannot be used with an Irish passport	Must still be valid
Cards carrying the PASS accreditation logo	UK, Isle of Man and Channel Islands	Must still be valid

Document	Notes	Issue date and validity
Letter from head teacher or college principal	UK - for 16 to 19 year olds in full time education - only used in exceptional circumstances if other documents cannot be provided	Must still be valid

## **Checking driving licences**

Do not accept licences, other than those stated in the list of valid identity documents.

English, Welsh and Scottish driving licence numbers contain information about the applicant's name, sex and date of birth. This information is written in a special format but can be gleaned and matched against the information provided by the applicant.

Please note that the date of birth on English, Welsh and Scottish driving licences, issued before 1977, is not recorded as a separate entry on the licence. The date of birth can be deciphered from the driving licence number and checked against the date of birth field on the application form.

For example, the format of the number for Christine Josephine Robinson, born 2 July 1975

ROBIN757025CJ99901

NNNNNYMMDDYIICCCCC

N = 1st five letters of the surname (if the surname begins MAC or MC it is treated as MC for all).

Y = YEAR of birth.

M = MONTH of birth (In the case of a female, the number represented by the first M will have the value 5 added to the first digit e.g. a female born in November (i.e. 11) would display '61' in the MM boxes or if born in February (i.e. 02) would display '52').

D = DAY of month of birth.

I = Initial letter of the first two forenames - if only one, then 9 will replace the second letter. If the licence indicates that the applicant has a middle name, ensure that one has been provided in Section A.

C = Computer generated.

For Northern Ireland; Isle of Man and Jersey driving licences the licence number is in a different format. The licence number is unique to the driver and the 'name' or 'date of birth' validation, as shown above, cannot be used.

#### How do I check for indicators of fraud?

Always check for signs of tampering when checking identity documents. Documents should be queried if they display any signs of damage, especially in the areas of personal details such as the name and the photograph. The following guidelines should help you look out for any suspicious signs when authenticating documents. The National Document Fraud Unit (NDFU) in the Home Office has published <u>guidance on examining identity documents</u> to detect basic forgeries.

## Checking a passport

Check the general quality and condition of the passport. Treat it with suspicion if it is excessively damaged; accidental damage is often used to conceal tampering.

Photographs should be examined closely for signs of damage to the laminate or for excessive glue or slitting of the laminate; these signs would indicate photo substitution. If the photograph appears excessively large, this might indicate an attempt to hide another photograph underneath. There should also be an embossed strip embedded into the laminate, which will catch a portion of the photograph.

Check there is no damage to this area. If the passport is from a foreign national, you can still follow the same procedures as above.

Her Majesty's Passport Office has produced a guide to be used when <u>checking passports for identification</u>.

## Checking a photo driving licence

Examine the licence for evidence of photo tampering or any amendment of the printed details.

# Checking an old style driving licence (no photograph)

Remove the document from the plastic wallet and check that it is printed on both sides.

It should have a watermark visible by holding the licence up to the light and there should be no punctuation marks in the name or address.

The 'Valid To' date should be the day before the bearer's 70th birthday (unless the bearer is already over 70). The 'Valid To' date can therefore be cross-referenced with the applicant's date of birth detailed in Section A.

## Checking a birth certificate

Birth certificates are not evidence of identity, and are easily obtained. Although certificates issued at the time of birth may give more confidence that it belongs to the individual, unlike a recently issued certificate, they will not show if any information has been corrected or superseded by a new registration.

Check the quality of paper used; genuine certificates use a high grade. There should be a watermark visible when the document is held up to the light. Any signs of smoothness on the surface would indicate that original text might have been washed or rubbed away. There should be no signs of tampering, changes using liquid paper, overwriting or spelling mistakes.

The following list provides some general information about certificate completion which may help to establish whether the certificate and/or the details have been falsified. This is provided solely as a guide and is not exhaustive:

- •the certificate format used should be appropriate for the year of registration.
- •only the surname should be entered in upper case, not the forename(s).
- •dates of birth should be shown with the day and month in words and the year in figures.

The following information might indicate that the certificate has been altered:

- •spacing between falsely added particulars might be irregular compared to original information. 'Thick' or 'thin' spacing might infer particulars have been added.
- •false particulars might not have been aligned with other words.
- •characters may not be of the same size or shape with the rest of the particulars.
- •movement of handwriting may look mechanical and does not flow with the rest of the particulars.
- •changes might not be consistent e.g. parents' surnames might be altered, but not the signatures.
- •the area around falsely added or removed particulars may react differently under an ultra violet light i.e. show signs of staining. In addition, such areas of paper may appear thinner where the paper fibres have been disturbed by abrasion.

For more information on checking birth certificates, please refer to Her Majesty's Passport Office document General Register Office guide to birth certificates.

## Checking an EEA photo identity card

Examine the card for evidence of photo tampering or any amendment of the printed details.

#### **Checking an HM Forces ID card**

Examine the card for evidence of photo tampering or any amendment of the printed details.

#### Checking a firearms licence

Check the licence is printed on blue security paper with a Royal crest watermark and a faint pattern stating the words 'Home Office'.

Examine the licence for evidence of photo tampering or any amendment of the printed details, which should include home address and date of birth.

The licence should be signed by the holder and bear the authorising signature of the chief of police for the area in which they live, or normally a person to whom his authority has been delegated.

## Checking a biometric residence permit

View the features of a permit and <u>how to check a job applicant's biometric residence permit</u> to see if they have a right to work in the UK.

## Other types of ID

Ensure all letters and statements are recent, i.e. within a three month period. Do not accept documentation printed from the internet.

Check letter headed paper is used, bank headers are correct and all documentation looks genuine. The address should be cross-referenced with that provided by the applicant.

## What should you do if you suspect false identity or documents?

If you suspect that you have been presented with a false identity or documents at the time of application, do not proceed with the application process.

- report suspected identity fraud through the Action Fraud website
- further information on identity fraud can be found on the Metropolitan police website
- if you suspect identity fraud once a DBS check has been submitted, you must call us on 03000 200 190

You are also advised that under Section 8 of the Asylum and Immigration Act 1996 all employers in the United Kingdom are required to make basic document checks to help prevent anyone from working illegally.

By carrying out checks employers will be able to establish a defence for themselves if any of their employees are found to be working illegally at a later date.

Further details are available on the <u>UK visas and immigration website</u> or by calling the employer helpline on 0845 010 6677.

# Where to go for help to check non-UK issued identity and travel documents

You can go to the <u>public register of authentic identity and travel documents online</u> on the PRADO website to identify the basic safeguards contained in European documents and a few more other nationality documents.

The PRADO website is provided by the Council of European Union.

#### **External validation service**

An external ID validation check is an alternative way of verifying the identity of an applicant.

It will involve you providing an applicant's details (as presented on the application form) to your chosen supplier, who will compare the data you have obtained from the applicant against a range of independent, external data sources.

For the purposes of accessing DBS services we request that employers pursue a check that is aligned to the following standard:

 LEVEL 2 (Remote) – as detailed in <u>HMG's Minimum Requirements for the</u> Verification of the Identity of Individuals/Version 2.0/January 2003

This document was produced by the <u>Cabinet Office</u> and provides guidelines for verifying the identity of individuals, prior to granting access to government services. A 'Level 2 (Remote)' check provides substantial assurance that the registrant's real world identity is verified.

It is important to note that standards set out in the above are widely acknowledged within the ID checking industry.

DBS countersignatories will not be required to have any in-depth knowledge of what a 'Level 2' check involves. Those organisations who provide the check, will be in a position to give an assurance that they comply with the standards described within the guidance.

#### How can I access an external ID validation check?

There are a large number of suppliers that may be able to perform a check for you to the required standard. We recommend you begin enquiries through an internet search e.g. UK search for 'Identity Validation'.

We know that Call Credit Group, Equifax, Experian, and GB Group are working towards the provision of ID validation services tailored for DBS purposes.

Registration to access an external ID validation service may differ for each supplier. We would encourage you to discuss your requirements with more than one supplier to gain access to checks in the most appropriate way for your organisation and to agree charges.

# How do I decide whether an applicant has passed or failed an external ID validation check?

You should specify when sourcing a potential ID validation supplier that a 'PASS/FAIL' decision is required as part of the check that you request.

Dependent on the result, you will then either authenticate the applicant or consider moving to route three of the process.

#### Easy five-step guide to accessing an external ID validation check

General information on how to access a suitable external ID validation check. This is a guide and not exhaustive.

#### Step 1

Research suppliers that provide an ID validation service (i.e. through use of an internet search engine – entering wording like 'ID verification' should return a number of suppliers websites). You should read the general information provided by these suppliers regarding the type of services they provide before deciding whether to contact them.

#### Step 2

Once you have identified a suitable supplier, you should make contact using the telephone number or email address provided on their website. Use the following requirements in your discussions to decide whether the supplier can provide an ID check that is suitable for DBS purposes:

We require an ID validation check which:

- complies with the standards set out in Level 2 (remote) of 'HMG's Minimum Requirements for the Verification of the Identity of Individuals/Version 2.0/January 2003'.
- provides a straightforward PASS/FAIL result (some suppliers may return a score or a percentage, neither of which are acceptable).

provides a hard copy or printable result page.

#### Step 3

If the ID validation supplier can meet the above requirements; you should then gather further information by asking questions such as:

- can you perform this type of check now, or is the service still in development?
- how much will it cost?
- how do I register with you?
- what are the payment methods and processes?
- what are your terms and conditions?

#### Step 4

You may wish to contact a number of ID validation suppliers to establish which is best suited to your requirements.

#### Step 5

Start conducting external ID validation checks on applicants to establish their identity.

The process of accessing an external ID check supplier should only need to be carried out once. When you have identified a suitable supplier there should be no need to source an alternative, unless you decide the service is unsatisfactory.

#### Applicants who have been adopted

If they were adopted before the age of 10, they do not need to provide their surname at birth in section A of the DBS application form, they should give their adoptive name in this section.

This is because the age of criminal responsibility is deemed to be 10 years, under the Children and Young Persons Act 1933, Chapter 12, Section 50. This means that there is no possibility that an individual could have a criminal record in a name that was used until the age of 10.

## What if the applicant's identity cannot be established using one of the three routes?

If you or your ID checker cannot establish an applicant's identity in accordance with DBS ID guidelines then you should mark W59 on the application form with a NO.

Applicants who are unable to provide the required documents will then be asked to give their consent to have their fingerprints taken in line with the current procedure. Employers should note this will require attendance by the applicant at a police station at an appointed time, and may add delay to the overall application process.