ID checking guidelines for basic DBS checks

These guidelines come into effect from 22nd April 2025, however the <u>previous ID checking</u> <u>guidelines</u> can also be used up until 1 November 2025.

1. Introduction

Identity verification is an important part of the DBS process. The identity information provided is used to search for any relevant police records. Without accurate identity information DBS may not be able to provide full and accurate information. Including as much detail as possible on the application form and as part of the identity verification process makes it easier and quicker for DBS to accurately process applications.

This guidance explains what Responsible Organisations, or the third parties they have contracts with to validate identity, need to do in order to verify the identity of individuals using their service to apply for DBS basic checks. Different guidance exists for checking the identity of applicants for standard and enhanced checks.

2. Right to Work

Employers must complete a Right to Work check on all new recruits. Guidance on how to do this can be found <u>here</u>.

3. Identity check rules

The identity checker cannot verify the identity of a relative or partner, people who live in the same house as them, or a personal friend.

The ID checker must:

- Make sure that any details of current passport, driving licence and National Insurance Number are included on the electronic application form.
- Follow the two route ID checking guidance set out below.
- Consider using digital ID verification if the applicant can present a passport or driving licence.
- Seek photographic identity documents (passport, driving licence, e-Visa or PASS card) in the first instance. This can be used to compare the applicant's likeness.
- Check and validate the information provided on the electronic application form by the applicant.
- Check that the application form is completed in full and the information it contains is accurate. For example, that all addresses lived at in the last 5 years and all names know by have been declared accurately. Failure to do this can result in delays caused by conflicted applications that may be withdrawn.
- Make sure the applicant fills in the address part of the form correctly if they have an <u>unusual</u> <u>address</u>, for example if they live abroad, in student accommodation or a hostel.

- Use a document type only once in the document count. For example, don't accept two bank statements as two of the required documents if they are from the same bank.
- Not alter or amend the application form without the knowledge or agreement of the applicant.
- Keep a record of the documents used to validate each identity for a minimum of 2 years. This is
 in line with compliance activity carried out by DBS. DBS will ask for records of documents
 checked as part of ID verification as part of this process. Documents can be recorded as copies
 of physical documents or PDF evidence of eVisa. If it is not possible to keep copies you should
 record:
 - document type
 - country of issue
 - any expiry date
 - any reference numbers, and
 - notes if there were any discrepancies discussed as part of the ID verification process.

4. How to view ID documents

There are three ways in which ID documents can be viewed and validated. You must use option one unless it is impossible to have a face-to-face appointment with the applicant. If you are unable to use option one the reasons need to be recorded and option two can be considered. If option two is impossible the reasons must be recorded and option three can be used.

All documents must be physical documents, unless you are viewing an applicant's eVisa on the Home Office view and prove site or a digital PASS card with a QR code that has been checked. You cannot accept photocopies or scanned documents. Documents printed from the internet, for example bank statements, are not acceptable for ID purposes. The applicant can ask their bank to print off a bank statement for them and endorse it with a stamp and signature if they do not have hard copy bank statements.

4.1 Option one

The ID check should be done in person, allowing the ID checker to view the physical documents. eVisa, or digital PASS card in the presence of the individual.

If you cannot use option 1, please consider using digital identity verification before considering option 2.

4.2 Option two

The ID checker can conduct the ID check via video link – for example Google Meet or FaceTime. In these circumstances the ID checker must be in possession of the physical documents. These can be posted to the ID checker in advance of the virtual call. Any risks identified when using live video must be assessed and mitigated by you. 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 option two is used, you must keep a record of why option one was impossible, along with a record of the documents used to validate the identity, for a minimum of 2 years. The

rationale must be specific to the individual ID verification, it is not acceptable to default to the use of options two or three. You should also consider using digital identity verification.

Example:

Susan has applied for a job in Sussex, but she currently lives in Aberdeen. She is unable to attend for a physical interview because she has childcare responsibilities. She will therefore not be able to present her documents in a face-to-face ID check. Susan posts her documents via special delivery in plenty of time for her interview. The recruiter conducts the interview and ID check over live video link, looking at the physical documents while talking to Susan via Google Meet. The documents are then posted back to Susan via special delivery. It is the responsibility of the recruiter to make sure the documents are safely handled, stored and returned to Susan promptly in the same condition they arrived. When the recruiter makes a record of the document details they will note that the physical documents were checked but that the applicant was seen over video link.

4.3 Option three

The ID check can be completed via video link – for example Google Meet or FaceTime – without the ID checker being in physical possession of the ID documents. The details of documents, as set out above, must be recorded and stored at the time of the video link ID check. The documents must be presented to the ID checker on the first day of employment. The ID checker must record the date the ID check was completed in person and cross reference with the details recorded from the video link ID check. If there are any discrepancies the DBS check may be invalid.

If option three is used you must keep a record of why options one and option two were impossible, along with a record of the documents used to validate the identity, for a minimum of 2 years. The rationale must be specific to the individual ID verification, it is not acceptable to default to the use of options two or three as part of your process.

Example:

Susan has applied for a job in Sussex, but she currently lives in California USA. She is unable to attend for a physical interview and will therefore not be able to present her documents in a face-to-face ID check. She is in the process of applying for a visa and needs her documents for travel so cannot post them to the recruiter. The recruiter conducts the interview and ID check over live video link. Susan shows the recruiter her documents over video link and the recruiter records the details as well as notes confirming that the physical documents have not yet been seen. On Susan's first day at work, she brings the documents which are checked against the details recorded at the interview. A note is added confirming that the physical documents have been seen.

4.4 What if there are discrepancies?

If there are any discrepancies in the information provided by the applicant and/or the identity documents supplied, and fraud is not suspected, you must ask the applicant to clarify. You must be satisfied that the discrepancies are legitimate and all name and address information is captured on the form in the current or previous name/address sections. If you do not do this, it may compromise the integrity of the DBS service and introduce risk to your recruitment or licensing arrangements and may cause delays in processing certificates. Discrepancies in information can include:

- discrepancies between address history and references or employment history. For example, if the applicant was employed in Scotland 2 years ago but no Scottish addresses have been declared, a conversation should be had. It may have been a remote working position, but this should be checked.
- Applicant is not currently living at their primary address –students for example. These
 applicants may have a driving licence or letters in an address in a different part of the country.
 For example students who live on campus during term time but still reside at their parents
 address as their permanent address. Both their permanent address and their term-time address
 must be included on the application form. The current address should be the address to which
 the applicant wishes to have their DBS certificate issued.

Example:

Alice is a student living on campus during term-time. She has applied for a basic DBS check using a driving licence with her parents address on it and a birth certificate. She can validate her identity using route one. Her driving licence is still valid as her parents' address is her permanent address. She must include both addresses on the application form.

- long names and/or initials on passports UK passports have an 'observations' section that should contain the full name. ID checkers should check examples of documents presented on the <u>public register of authentic identity and travel documents online</u> (PRADO) to establish if non-UK issued documents presented should have a similar section,
- different spelling of a name, for example an umlaut over the letter 'U', a common alternative spelling of a name (Katherine instead of Katharine) or a hyphenated name. In these circumstances, the correct spelling as identified by the applicant should be used as the current name and any other spellings entered in the previous names section on the application form,
- missing or additional names on identity documents, for example a driving licence with a missing middle name. This should only be the case where an individual has changed their paper driving licence to a photocard driving licence. To apply for a photocard licence for the first time a passport, EEA identity card or birth certificate need to be presented to DVLA so any middle names would be recorded. If a document with a missing or additional name is accepted the current name on the application form should be the applicant's full name, including the missing or additional name.

Example:

Derek has presented his driving licence, marriage certificate and mortgage statement. His driving licence shows his first name and surname, and his marriage certificate shows his first name, middle name and surname. He has never changed his name. Derek correctly completed his application form by entering all three names in the current name field and leaving the previous names section blank. All names have been entered on to the form so all combinations of those names can be searched.

• recent change of name for legitimate reasons, that can be evidenced. For example, by presenting a marriage certificate or deed poll. The change needs to be recent enough.

Example:

Alex has recently married and changed his surname to that of his wife. He has not yet updated his passport, but his bank accounts are all in his married name. Alex presents a marriage certificate alongside his passport showing the connection between the names and confirming his right to use both. The ID checker has assessed the passport and marriage certificate and spoken to Alex. Alex has also included his previous name on his application form. The ID checker is satisfied that the documents are genuine and that Alex's responses to questions do not cause concern. Even

though there is a name discrepancy between the current name on the application form and the ID documents the ID checker is satisfied there are no concerns that the ID is fraudulent and both names have been captured on the form.

5. Transgender Applicants

All applicants should be made aware of the <u>transgender application route</u>. Where an applicant has a Gender Recognition Certificate their previous sex is protected by law, and they do not need to declare it. However, for DBS purposes, all previous identities must be declared. The transgender application route allows those with a Gender Recognition Certificate to declare previous names and sexes without including them on the application form.

Example:

Janice has applied for a basic DBS check as part of a job application. The recruiter sends Janice a link to the electronic application form and some guidance on how to complete the application form. This includes a link to the transgender applications route. Janice legally changed her sex and does not want to disclose this information to her employer, the HR team or colleagues. All Janice's ID documents are in her current identity. The guidance tells her how to contact DBS to provide the additional name information and explains that she does not have to include it on the application form. The recruiter will not be informed, and her DBS certificate will contain only the identity information on the application form.

6. 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.

7. The 2 Route ID Checking Process

You must use route 1 where possible. You can only move on to route 2 if the applicant is unable to present the documents needed in route 1.

7.1 Route 1

The applicant must be able to show the following:

- 1 document from Group 1, below; and
- 1 further document from either Group 1, or Group 2a or 2b, below

The combination of documents presented must confirm the applicant's name and date of birth. If this can't be achieved within 2 documents a third can be selected.

The applicant should have their identity validated using Route 1. If an applicant can't provide Route 1 documents, Route 2 may be used once the ID checker is satisfied there's a valid reason following a discussion with the applicant.

8. Route 2

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

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

The combination of documents presented must confirm the applicant's name and date of birth.

If an applicant is unable to provide this documentation they can't submit an application for a DBS basic check.

9. Document lists

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.

9.1 Group 1: Primary identity documents

Document	Notes
Passport	Any current and valid passport. A UK passport can be expired up to a maximum of 6 months.
e-Visa	Accessed via the 'View and Prove' service. The share code requested by the applicant should be a 'general' share code. If you do not have a UKVI account to access your eVisa you can create you can create one online (<u>Get access to your online immigration status (eVisa) - GOV.UK</u>)
Biometric residence permit	UK. A BRP showing Indefinite Leave to Remain, Indefinite Leave to Enter or No Time Limit can be used up to 18 months past the expiry date of the BRP. BRP holders should be encouraged to create an account and access their eVisa
Application Registration Card (ARC)	Issued by the Home Office. Must be checked against the Home Office Employer Checking Service.
Current driving licence photocard - (full or provisional)	Current and valid photocard driving licence issued by UK, Isle of Man, and Channel Islands. 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. Must be original birth certificate. Certified copies are a group 2a document
Adoption certificate	UK and Channel Islands

9.2 Group 2a: Trusted government documents

Document	Notes
Current driving licence photocard - (full or provisional)	Current and valid. All countries outside the UK (excluding Isle of Man and Channel Islands)
Current driving licence (full or provisional) - paper version (if issued before March 2000)	Current and valid. UK, Isle of Man, and Channel Islands
Birth certificate - issued after time of birth	UK, Isle of Man, and Channel Islands
Marriage/civil partnership certificate	UK and Channel Islands

Document	Notes
Immigration document, visa, or work permit	Issued by a country outside the UK. Valid only for roles whereby the applicant is living and working outside of the UK. Visa/permit must relate to the non-UK country in which the role is based
HM Forces ID card	UK
Firearms licence	UK, Isle of Man, and Channel Islands

9.3 Group 2b: Financial and social history documents

Documents	Notes	lssue date and validity
Mortgage statement	UK	Issued in last 12 months
Bank or building society statement	UK and Channel Islands. A print off of a bank statement that is endorsed with a stamp and signed by the bank is acceptable if you do not have hard copy bank statements posted to you.	Issued in last 3 months
Bank or building society statement	Countries outside the UK	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	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

Documents	Notes	Issue date and validity
Letter of sponsorship from future employment provider	Non-UK 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 Cannot be printed from an online account	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, Local Authority	UK and Channel Islands - a letter confirming entitlement to benefits. For example: Personal Independence Payment (PIP), free school meals, universal credit, asylum support etc	Issued in last 3 months
HMRC self-assessment letters or tax demand letter	UK	Issued in last 12 months
European Health Insurance Card (EHIC) or Global Health Insurance Card (GHIC)	UK.	Must still be valid
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. Digital PASS cards are acceptable where they have been issued by an approved digital PASS provider and the QR code has been used to confirm details.	Must still be valid
Letter from head teacher, college principal, apprenticeship provider	UK - for 16 to 19 year olds in full time education or on an apprenticeship - only used in exceptional circumstances if other documents cannot be provided	Issued in the last month

10. Guidance on Checking Documents

10.1 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 are not intended to cover all possible scenarios of potential fraud, but may help you look out for any suspicious signs when authenticating documents. The National Document Fraud Unit (NDFU) in the Home Office has also published <u>guidance on examining</u> <u>identity documents</u> to detect basic forgeries.

10.2 Checking a passport

HM Passport Office has produced a guide to be used when checking passports for identification.

If the passport is from a foreign national, 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.

10.3 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 decoded as explained below 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:

R O B I N 7 5 7 0 2 5 C J 9 9 9 0 1

N N N N N Y M M D D Y I I C C C C C

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, for example, 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' verification, as shown above, cannot be used.

10.4 Checking a photo driving licence

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

10.5 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.

10.6 Checking an eVisa using view and prove

Ensure that evidence is always taken from a .gov.uk web address.

The share code requested by the applicant should be a 'general' share code. If you do not have a UKVI account to access your eVisa you can create you can create one online (<u>Get access to your online immigration status (eVisa) - GOV.UK</u>)

10.7 Checking a biometric residence permit

View the features of a permit and how to check a job applicant's biometric residence permit.

Please note, a BRP can no longer be used to prove right to work but it is currently still acceptable for ID purposes.

10.8 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 ultraviolet 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 HM Passport Office document General Register Office guide to birth certificates.

10.9 Checking an EEA photo identity card

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

10.10 Checking an HM Forces ID card

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

10.11 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.

10.12 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.

11. 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 <u>Action Fraud website</u>
- 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

12. 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.