

Mayflower Disclosure Services Ltd

ID Checking Guidelines for DBS Applications

Introduction

These ID Checking Guidelines have been produced in line with DBS Guidelines “ID checking guidelines for standard/enhanced DBS check applications”, which are published on the DBS website: <https://www.gov.uk/government/publications/dbs-identity-checking-guidelines>

The applicant must provide a range of ID documents as part of the DBS check application process.

As an Employer (meaning employer / recruiting Organisation / Regulated Activity Provider) you must:

- follow the three route ID checking process as outlined in the list of Acceptable ID available to view/download from our [Customer Resources/Links webpage](#) on our website (www.dbsdirect.co.uk). The list of Acceptable ID has been stipulated by the Disclosure and Barring service.
- check and validate the information provided by the applicant on their DBS application form
- 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 DBS application form is fully completed and the information it contains is accurate. Failing to do this can result in delays or an inaccurate DBS certificate

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 current name, date of birth and current address provided 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 on the DBS application form
- one document must confirm the applicant's date of birth as recorded on the DBS application form
- 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 on the DBS application form, in accordance with the guidance
- the applicant 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 applicant's 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

It's important to note that a DBS check does not provide evidence of a person's right to work in the UK. You may also need to complete a [right to work check](#) on the person to make sure they can work in the UK.

Documents the applicant must provide for the ID checking process

Read our [list of Acceptable ID](#) for detail of the documents that need to be provided for the ID checking process.

- from 8 June 2015, the paper counterpart to the photocard driving licence will not be valid and will no longer be issued by DVLA. The list of group 1 documents has been updated to reflect this change

Paper driving licences issued before the photocard was introduced in 1998 will remain valid and should not be destroyed. These can be used as part of group 2a documents.

Three routes of ID checking

Important note:

European Economic Area (EEA) Nationals (Non-UK):

Where an EEA National has been resident in the UK for five years or less, the employer should validate identity via route one through the checking of a current passport or current Group 1 Driving Licence (photo card) plus 2 further documents.

In the absence of a group 1 document, the employer must satisfy themselves of a valid reason for using route two.

Non-EEA Nationals:

All Non-EEA Nationals should be validated via route one only.

Route one

All applicants must initially be considered for route one.

Can the applicant produce a group 1 document? If yes, then the applicant must produce 3 documents:

- 1 document from group 1 (refer to [list of valid identity documents](#)); and
- 2 further documents from group 1, 2a or 2b

At least 1 of the 3 documents above must show the applicant's current address.

If the applicant has satisfied this route, then the document check is complete. If the applicant cannot produce a group 1 document then go to route two.

Route 2

The applicant must produce:

- 3 documents from group 2 consisting of;
- 1 document from group 2a; and
- 2 further documents from group 2a or 2b; one of which must verify their current address. and
- the organisation conducting the ID check will then need to ensure an appropriate external ID validation service is used to check the applicant against their records to establish the applicant's name and living history footprint. Please [contact us](#) if you require an [External ID Validation check](#).

Route 3 should only be used in circumstances once you have fully explored with the applicant why their identity has not been successfully validated via routes 1 or 2.

To do this, you should hold a probing discussion with the applicant about the likely reasons why their identity has not been validated before considering using route three. You should keep a record of this discussion for internal purposes, it is the employer's responsibility to establish the true identity of the applicant through the examination of a range of documents set out in this guidance.

If you have tried to use route two, but have been unable to validate the applicant's identity successfully, you may consider proceeding to route three.

Route 3

All employers must have tried to take route one and route two before you consider processing through route three.

If the applicant cannot meet the requirements of route one and two, you should have had a probing discussion with them to establish why they could not meet these requirements and whether there has been a recent or previous change of name that has not been declared.

For route three, the applicant must produce:

- birth certificate (UK and Channel Islands) – (issued after the time of birth by the General Register Office/relevant authority i.e. Registrars – Photocopies are not acceptable) and
- 4 further documents from group 2 consisting of:
- 1 document from group 2a; and
- 3 further documents from group 2a or 2b; one of which must verify their current address.

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

If the applicant fails to produce the required document set at route three, they will need to be sent for fingerprinting by the police. Please [contact us](#) so we can send you a paper application for the applicant to complete and return.

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 will cause considerable delay to the overall application process.

External ID 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:

- Medium confidence – as detailed in the [Good Practice Guide \(GPG\) 45](#)

This document was produced by the [Cabinet Office](#) and provides guidelines for verifying the identity of individuals, prior to granting access to government services. A 'Medium confidence' check (previously known as 'identity level 2') 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 'Medium confidence' 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. Mayflower Disclosure Services Ltd is able to complete an External ID validation check you may require, please contact us via email or via our [Contact Us](#) form. Further information can be found on our website www.dbsdirect.co.uk.

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.

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.

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 in Section A.

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.

An example is provided here: <https://www.drivercheck.co.uk/driver-licence-information/photocard-driving-licence-explained/>. Please note: We have no affiliation with this website and are not responsible for its content.

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 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 [checking passports for identification](#).

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 the 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

<https://www.gov.uk/government/publications/birth-certificates-and-the-full-birth-certificate-policy/birth-certificates-and-the-full-birth-certificate-policy>.

Checking an EU 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 how to check them on the UK Visas and Immigration website.

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 quoted in Section B.

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 the DBS 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 [UK visas and immigration](#) website or by calling the employer helpline on 0845 010 6677.

Where to go for help

You can go to the [public register of authentic identity and travel documents online](#) 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.