



DBS identity checking scenarios

Below are a number of scenarios which will demonstrate the documents you may be presented with as part of the Disclosure and Barring Service's (DBS) identity checking process, and how to use the appropriate route to establish an applicant's identity.

For more information, please refer to the 'Identity checking guidelines for DBS checks' guidance document which lists the acceptable documents and the routes you should follow. Flow charts illustrating each route are available at the end of this document.

Satisfying Route One

The applicant must produce 3 documents as follows:

- 1 document from Group 1
- 2 further documents from Groups 1, 2a or 2b, one of which must verify their current address.

Scenario one

John is 17 and is volunteering as a Group Leader with a national organisation working with 5-16 year olds.

He provides the following documents:

- **A valid UK passport (Group 1)**
- **A birth certificate issued at time of birth (Group 1)**
- **A bank statement dated within the last month (Group 2b)**

John has a Group 1 document (valid UK passport), so the organisation should first investigate the use of Route One. In addition to this Group 1 document, he also has a further Group 1 document, and a Group 2b document which confirms his current address. Therefore, these documents satisfy Route One, and can be used to verify his identity.



Scenario two

Ruth is applying to a local NHS Trust to work as a staff nurse.

She provides the following documents:

- **A valid UK passport (Group 1)**
- **A Current UK Driving licence (Photo card and Counterpart) (Group 1)**
- **A TV Licence**

Ruth has provided only 2 valid documents. Whilst a TV Licence is now not an acceptable document for the purposes of identity verification, it could be a useful indicator of what other documents Ruth may be able to provide. In this case, Ruth's TV Licence suggests she is a homeowner or lives in rented accommodation, and she may be able to produce another document such as a council tax statement. Through a combination of the two Group 1 documents provided, and by now questioning Ruth, she can provide a council tax statement as a Group 2b document which confirms her current address.

Ruth has satisfied the requirements for Route One.

Scenario three

Mohammed is applying to go to teacher training college and is required to undergo a DBS check as he will be going on school placements.

He provides the following documents:

- **A valid UK passport (Group 1).**
- **A two-month old bank statement (Group 2b).**

He is adamant he has no other documents from Groups 1, 2a or 2b.

This combination of documents provides insufficient evidence, and would not satisfy any of the routes available. The college may wish to advise Mohammed that he could obtain a copy of his birth certificate (Group 2a) from the General Register Office (GRO) at <http://www.gro.gov.uk/gro/content/certificates/default.asp>. If he were to provide this, he would now have one document from Groups 1, 2a and 2b, and as the bank statement confirms Mohammed's current address, this would satisfy the requirements for Route One.



Satisfying Route Two

If the applicant is unable to provide a Group 1 document, then you should proceed to Route Two. In the first instance, the applicant must produce 3 documents in total:

- 1 document from Group 2a; and
- 2 further documents from Groups 2a or 2b, one of which must verify their current address.

Once satisfied with these documents, you need to use an appropriate external ID validation service to establish the applicant's name and living history footprint.

Full details of how to use an external identity validation check can be found on pages 5-6 of the 'Identity checking guidelines for DBS checks' guidance document.

Scenario four

James is 20 years old and applies for a post as a care worker with a supply agency. He provides the following documentation for identity validation:

- **His birth certificate, obtained when he was 18 years old (Group 2a)**
- **A building society statement , issued last month verifying his address (Group 2b)**
- **A P60 statement dated 3 months ago (Group 2b)**

As James has not provided a Group 1 document, the agency is unable to validate his identity using Route One. However, he has provided sufficient documents to be processed by Route Two.

A Director of the Agency searches the internet to ascertain which organisations provide an ID verification service that meets the requirements of a Level 2 (Remote) check. She contacts a number of service providers before deciding on which one best suits their needs e.g. cost and payment method; terms and conditions; timescale; printable or hard copy result.

Although the organisation does not have any in-depth knowledge of what a 'Level 2' check involves, the chosen service provider is in a position to give an assurance that they comply with the standards described within the published guidance.



The agency has set up the required procedures and is able to progress with James' application and verify his identity using Route Two. A "pass" result is provided by the external identity verification service provider and the identity check is complete.

Scenario five

Adrian is applying for the post of a physiotherapist with his local NHS trust. He is required to undertake a DBS check and provides the following documentation:

- **a birth certificate issued 5 years ago (Group 2a)**
- **a copy of his current bank statement verifying his address (Group 2b)**
- **a letter from Department for Work and Pensions (DWP) regarding his job seekers allowance dated one month ago. (Group 2b)**

As Adrian has no Group 1 document, you are unable to use Route One. The Registered Body (RB) have sourced an external ID verification service, so they decide to progress to Route Two.

The result from the ID verification service provider is a "pass". The RB can be assured that Adrian's identity has been verified to the required level and the ID validation process is complete.

Scenario six

Tahney is a 17 year old school leaver (leaving school in 5 weeks) and is applying for the post of nursery assistant. She is required to undergo a DBS check and produces the following documentary evidence

- **A current UK photo card driving licence but has mislaid the counterpart (*Not acceptable*)**
- **Birth certificate issued when she was 10 years old (Group 2a)**
- **Building Society statements from last month verifying her address (Group 2b).**

She is adamant she has no other documents from the list provided that she could use.



Tahney has produced insufficient documents to validate her identity using Route One.

As she has mislaid the counterpart to her driving licence the document is invalid. The RB would advise her to contact DVLA about this.

Tahney is 17 and still at school and could get a letter from her headmaster confirming her name, address and any other details they feel appropriate.

She does not have sufficient documents to use Route 2, but after a probing discussion the RB decide to let her get a letter from the headmaster confirming her name and address and agree to process her through Route Two.

The RB contact the ID verification service provider and the result obtained is a "Fail". It would appear that Tahney may not have yet established a living history footprint and they would now need to consider using Route Three. However, Tahney has now informed them that she has acquired a replacement counterpart of her driving licence from the DVLA. This now means she has a Group One document and coupled with her birth certificate and Building Society statement, the RB may now process by validating her ID using Route One.

Satisfying Route Three

All Registered Bodies must have exhausted Route One and should have endeavoured to use Route two before considering to process any applicant by Route three.

You should have had a probing discussion with the applicant to establish why they were unable to be processed by Routes One or Two.

Scenario seven

Doris has recently retired and wishes to volunteer at her local adult care home. She has not travelled abroad for some time, therefore her passport has expired. She has never driven, and her birth certificate issued at the time of birth is lost; but she does possess a birth certificate issued 15 years ago. Therefore, she has no Group 1 documentation, and could not satisfy the requirements for Route One. She explains that all the household bills are in her husband's name. Following a discussion, the Registered Body establishes that Doris can provide the following documents:



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- **A UK birth certificate issued 15 years ago. (Group 2a)**
- **A Marriage Certificate (Group 2a).**
- **A recent P45 (Group 2b).**
- **A pension statement (Group 2b).**
- **A recent bank statement (Group 2b).**

Doris has sufficient documents to satisfy the requirements for Route Two. However, on this occasion, the Registered Body have been unable to carry out an external identity verification check, despite endeavouring to do so.

As Doris possesses a copy of her birth certificate (Group 2a), we can move on to assessing her other documents. She has a Marriage Certificate (Group 2a), and also three further Group 2b documents, one of which verifies her address and therefore she has satisfied Route Three.

Scenario eight

David is applying to work as a volunteer Youth Leader with under 14's and has no Group 1 document.

He provides the following documents:

- **A HM Forces ID card (Group 2a).**
- **A P60 statement which is 5 months old (Group 2b).**
- **An electric utility bill which is 10 months old (Group 2b).**
- **A recent credit card statement (Group 2b).**

As David has no Group 1 documentation, the Registered Body moves on to Route Two. In this case, David has sufficient documents to satisfy the requirements for Route Two. However, on this occasion, the Registered Body carried out an external identity verification which resulted in a 'fail'.

Having endeavoured to carry out an external validation check without success, and following a probing discussion with David, the Registered Body would now move on to Route Three. In order to be able to satisfy Route Three, David would have to obtain a certified copy of his birth certificate from the General Register Office (GRO) at <http://www.gro.gov.uk/gro/content/certificates/default.asp>. Upon doing this, he would then have sufficient documentation to satisfy Route Three.



What to do next?

In the event of an applicant being unable to satisfy any of the three Routes, you should have a probing discussion with the applicant before considering whether to declare 'No' at section W59 of the application form. If you have done everything within reason to acquire the necessary documentation without success, the only further option is the applicant would need to be fingerprinted which may cause delays.

Non UK/EEA applicants only

Where an EEA National has been resident in the UK for five years or less, the Registered Body should validate identity via Route One through the checking of a Current Passport or Current UK Driving Licence (photo card only) plus two further documents from groups 1, 2a or 2b; one of which must verify their address.

In the absence of a Group 1 document the Registered Body must satisfy themselves of a valid reason for using Route 2.

Scenario nine

Agnetha is a Swedish national that has resided in the UK for the last 2 years. She is applying to a local NHS Trust to work as a consultant. She is required to undergo a DBS check and provides the following documentation:

- **A valid Swedish passport (Group 1)**
- **A UK marriage certificate (Group 2a)**
- **A one month old bank statement verifying her address (Group 2b)**

Agnetha has resided in the UK for less than five years and is able to produce a current passport (Group 1 document). The two further documents enable Agnetha to be processed by Route One and the document check is complete.

Scenario ten

Pierre is a French national that came to the UK a month ago on his EU identity card. He is residing with a friend prior to studying here for a year and has volunteered to work with the local church supporting young people in the



community. He is required to undergo a DBS check and produces the following documents:

- **A valid EU identity card (Group 2b)**
- **A bank statement from a French bank issued two weeks ago (Group 2b)**

Pierre has **not** produced a Group 1 document and therefore he cannot be processed using Route One.

The Registered Body has a case conference and decides that the option of using Route Two may not yield a 'pass' result as he has never lived in the UK and is unlikely to have a sufficient living history footprint to successfully validate his identity.

They discuss the issues with Pierre and establish that he does possess a valid French passport which his mother has in his family home in Bordeaux. He agrees to get her to post this to him.

However, the bank statement confirms his previous French address; and he advises that he intends to open a bank account in the UK. Pierre returns 10 days later with the following documentation:

- **A valid French passport (Group 1)**
- **A valid EU identity card (Group 2b)**
- **A bank statement from a French bank issued four weeks ago (Group 2b)**
- **A confirmation of account letter from a UK bank verifying his UK address (Group 2b)**

Pierre can now be processed by the use of Route One as he has provided more than sufficient evidence and the documentation check is complete.

Non UK/Non-EEA applicants only

All Non-EEA Nationals should be validated via Route One only.

Scenario 11

Pauline is an Australian national and has applied to come to the UK to work for an NHS Trust. The application for her DBS check is processed by the NHS Trust prior to Pauline coming over to the UK – She provides the following documentation to a representative of the Trust in Sydney:



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- **A valid Australian passport (Group 1)**
- **A valid Australian photo driving licence (Group 2a)**
- **A letter of sponsorship from the Trust verifying Pauline's current address. (Group 2b)**

Pauline has a Group 1 document and 2 further documents from Groups 2a and 2b which enables the RB to process her application through Route One.

Scenario 12

Javeed is an Indian national and has been living in the UK for two years. He has a year to run on his work permit and applies to work in a private school teaching special needs. The school requires Javeed to undergo a DBS check and he produces the following documentation:

- **A bank statement issued last month from a UK bank verifying his current address (Group 2b)**
- **A valid UK work permit (Group 2b)**

Javeed has not provided sufficient evidence to be processed by the use of Route One. As he is a non-UK/non-EEA applicant, he may **not** be processed other than by Route One.

You explain to Javeed that if he is not able to provide a Group One document, the only option would be for him to go for fingerprinting at a local Police station which would result in a delay to the DBS checking process.

Javeed accepts that he should not have mislaid his passport and has suggested that he request a new passport from the Indian embassy. He returns a few days later with a new valid Indian passport which now enables you to process his application through Route One.

*** If you or your ID checker cannot establish an applicant's identity in accordance with CRB 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. Registered Bodies should be aware that this will require attendance by the applicant at a Police Station at an appointed time, and may add delay to the overall application process. The following scenario highlights the fingerprinting process.**



Scenario 13

Andrew is 18 years old and is applying for the position of an Assistant Care Worker in a local care home. The care home uses the services of an Umbrella Body to process their DBS checks. He provides the following documentation to the care home:

- **A bank statement issued 2 months ago.**
- **A mobile phone bill issued a week ago.**

The bank statement is an acceptable Group 2b document, but the mobile phone bill can't be accepted. Andrew has insufficient documentary evidence and the Umbrella Body return the completed application form to the care home requesting further documentary evidence. The Care Home Manager holds a discussion with Andrew and he is adamant he has no other documents contained on the valid identity documents list.

The Umbrella Body submit the application to the DBS and indicate '**No**' at w59 – They have not established the true identity of the applicant.

In the first instance, the DBS returns the form to the Umbrella Body, in line with the rejection procedure applied from 03 September 2012; the reason being that they had indicated 'No' at w59 on the form.

The Umbrella Body contact the care home and they in turn contact Andrew direct and explain that if he fails to produce any further documentary evidence, the only alternative will be to have him sent for fingerprinting at a local police station – this will delay his application.

Andrew is once again adamant he can't provide anything further, so the form is returned to the DBS.

This time, Andrew's form is processed by DBS Customer Services where he is requested to attend a police station at a given time. He is asked to complete a consent form and produce three identical size photographs with his name clearly written on the back of each photograph with his customer reference.

Andrew attends the police station at the given time and the result is that there is 'no match' against all records that are checked and held by the police and other law enforcement agencies.

A clear DBS certificate is issued – It should be noted:

- The process took considerably longer than normal.

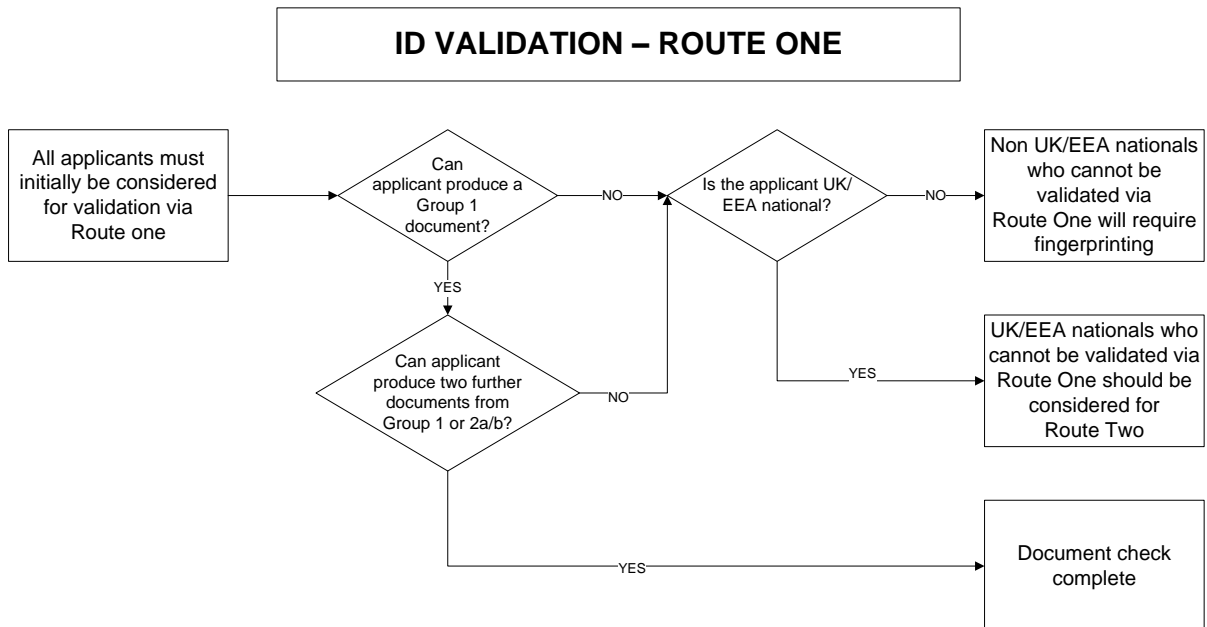


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- The resulting certificate does not provide proof of Andrew's identity – It just provides evidence that the police were unable to match the fingerprints against any records they searched.

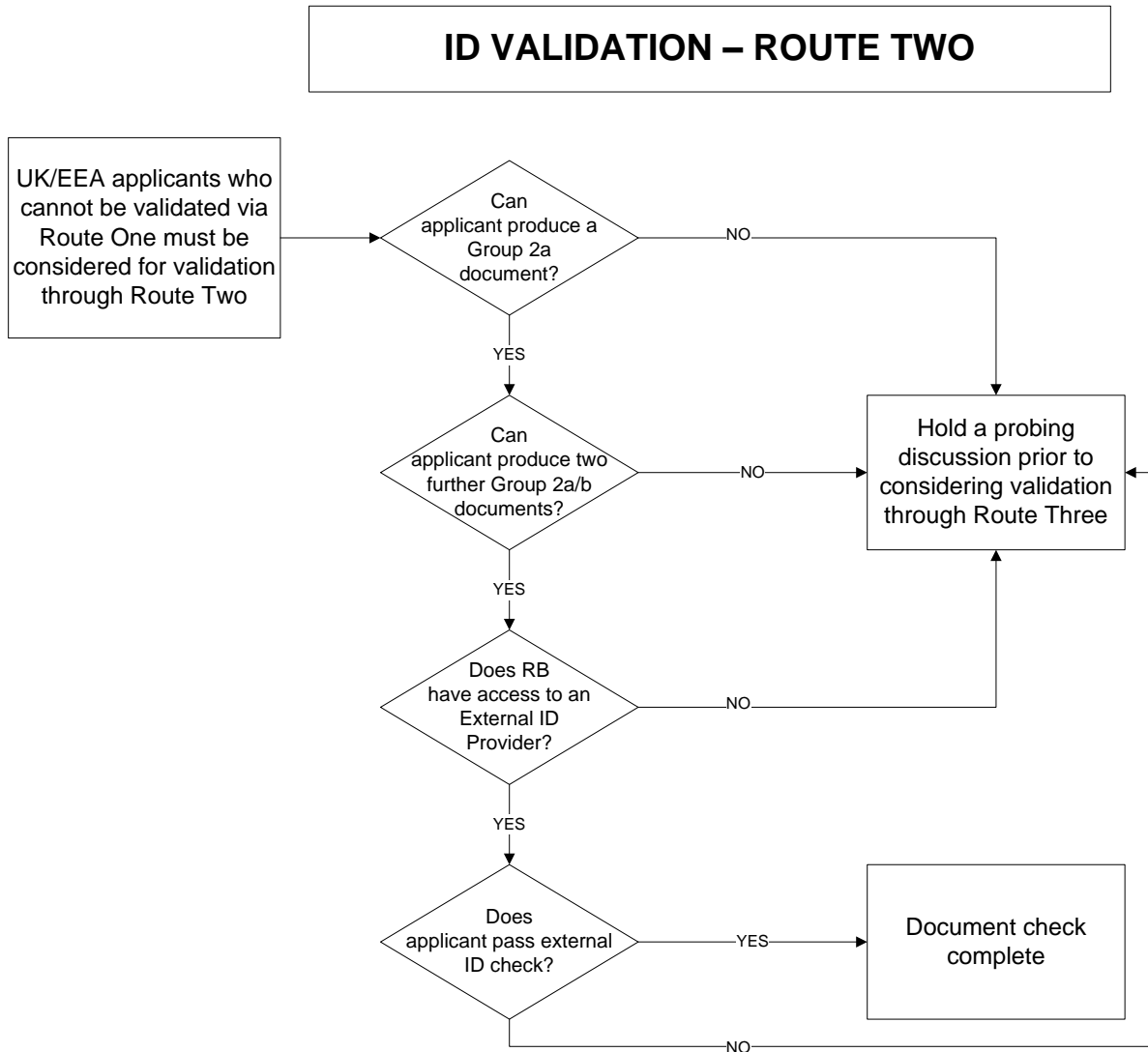


Route One flow chart





Route Two flow chart





Route three flow chart

