**1.** **What is a Disclosure or DBS Check?**

The [**Disclosure and Barring Service**](http://www.homeoffice.gov.uk/crime/vetting-barring-scheme/) (or DBS) formed in December 2012 as an amalgamation of the former Criminal Records Bureau ([CRB](http://trixresources.proceduresonline.com/nat_key/keywords/crb.html)) and the Independent Safeguarding Authority (ISA) agencies. The DBS continues to provide the Disclosure service for England & Wales.

A Disclosure (or DBS check) is a document that contains details of an individual's relevant criminal record (including convictions, reprimands, warnings and cautions) held on the Police National Computer (PNC). As of 29th May 2013 new filtering rules have been introduced under law which remove certain specified old and minor offences from Disclosures. From 10th September 2012, those roles that meet the definition of Regulated Activity as defined by the Protection of Freedoms Act 2012 will need to be checked against the relevant Barred List/s. From this same date those roles that fail to satisfy the new Regulated Activity definition can still be submitted for an Enhanced Disclosure however it is illegal for an “employer” or organisation to seek access to the Barred List/s in such instances.

A Disclosure enables organisations to make informed recruitment decisions

A Disclosure however does not replace usual recruitment and selection practices but is one part of the process.

There are 2 levels of Disclosure - Standard and Enhanced.

With effect from 12th October 2009, those people working with children or relevant adults are required to have an **Enhanced Disclosure**.

**2.** **Why Does the Catholic Church of England and Wales use Disclosures?**

The Catholic Church is committed to doing everything possible to ensure children, young people and vulnerable adults are kept safe from harm.

The single most important responsibility to be undertaken is to ensure that anyone who is applying to work or minister, whether paid or otherwise, within the Church in a role which gives them direct access to children or vulnerable adults is selected with the utmost care.

The use of Disclosures within the Church does not replace, and should complement, normal recruitment practices such as the gathering of personal details, face-to-face interview and references

The Church is legally required to operate safe recruitment procedures and as such utilises DBS Disclosures to fulfil its obligations. It is a criminal offence to appoint someone who is known to be disqualified from working with children and/or vulnerable adults to a Regulated Activity role. Failure to take advantage of the Disclosure service available to identify those who may be disqualified would be viewed as a failing of the Church's responsibilities and would be a criminal offence if the role constituted Regulated Activity.

**3.** **How are Disclosures Obtained for Relevant Roles in the Church?**

Disclosures are obtained for applicable roles and organisations within the Catholic Church of England & Wales.

CSAS is committed to the fair and sensitive use of Disclosure information and will take all reasonable steps to ensure that it, and those for whom CSAS acts as a Registered Body, seek to achieve and maintain models of best practice.

CSAS will seek to ensure that:

* Each post (paid or voluntary) is assessed to check the appropriateness of a Disclosure to the role, and where applicable, determine the relevant product i.e. Disclosure with or without Barred List access;
* Any advertisement for a post requiring a Disclosure indicates the level of Disclosure required pre-appointment;
* The conditional offer of employment (paid or voluntary) subject to the receipt of a satisfactory Disclosure is clearly indicated;
* Candidates for any office, paid post or voluntary position eligible for a Disclosure, are asked to provide in writing (under confidential cover) convictions or other disqualifying behaviour that might be revealed by the Disclosure process. This will assist the recruitment decision making process and will only be taken into account when relevant to the post applied for;
* When an existing office holder, employee or Volunteer moves into a position eligible for a Disclosure, they will then be asked to undertake the Disclosure application process and associated requirements;
* If concerns arise in relation to an existing post holder (Clergy, Religious, employee, office holder or volunteer) which are not deemed by the Statutory agencies to warrant investigation by them, CSAS will seek a further Disclosure with the individual's consent.

**4.** **What Roles within the Church are Eligible for a Disclosure?**

The Protection of Freedoms Bill achieved Royal Assent in May 2012.

There are 2 variations of Disclosure product that are available depending on whether the role meets the Protection of Freedoms Act definition of “Regulated Activity”.

It is important to note that the new legislation no longer recognises “vulnerable adults” nor where the activity takes place but instead focuses on specific activities needed by an adult, which when any adult is in receipt of those services would deem the adult to be vulnerable.

Regulated Activity when working with **children** is defined as:

* Unsupervised relevant activities which include teaching; training; instructing; caring for or supervising children or providing advice or guidance on wellbeing or driving a vehicle solely for children;\*
* The generic description of supervision “means day to day supervision as is reasonable in all the circumstances for the purpose of protecting any children concerned.” It is for each organisation to determine what is considered to be reasonable supervision in their context. Please refer to the Guidance on Supervision and Supervised Activities within the Catholic Church of England & Wales when assessing if a role meets the Regulated Activity definition.
* Relevant unsupervised work is only considered Regulated Activity if it is carried out regularly. Regularly is defined as work carried out by the same person once a week or more; on 4 or more days in a 30 day period or overnight. If someone is carrying out health care or personal care (for example those working in such roles with children on the Lourdes Pilgrimage) the frequency test does not apply and therefore this activity only needs to be carried out once to be considered Regulated Activity;
* Those who provide the day to day management or supervision of a person engaging in Regulated Activity with children are also in a Regulated Activity role.

\*There is an exception to this - those who are in paid posts working in a specified establishment (despite being subject to supervision) are still deemed to be in Regulated Activity. Specified establishments are listed within Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, updated by the Protection of Freedoms Act 2012.

Regulated Activity when working with **adults** is defined as:

* 6 specific categories of activity which when any adult is in receipt of such services is deemed vulnerable;
* Those categories of activity are:
  + Providing healthcare by a healthcare professional or under direction or supervision of one;
  + Providing personal care which is defined as physical assistance with eating; drinking; toileting; washing; dressing; oral care or care of skin, nails or hair (but excludes where a person’s hair is cut) because of the individual’s age, illness or disability. Also extends to those training, instructing or providing advice on personal care provision; those who prompt such needs and supervises the adult to do so;
  + Providing social work (meaning a social care worker under the Care Standards Act 2000);
  + Assisting with general household matters for example assisting with managing a person’s cash, paying a bill on someone’s behalf or shopping due to the adult’s age, illness or disability;
  + Assisting in the conduct of a person’s own affairs by virtue of a lasting power of attorney for example;
  + Conveying adults to, from or between places where they would receive the above categories of service.
* When looking at activities provided to adults (meaning those over 18 years of ago) there is no minimum frequency test. The first time any of the above activities are engaged in they become a Regulated Activity and the barred status of the person undertaking such activities must be checked BEFORE they provide the activity/service;
* Those who provide the day to day management or supervision of a person engaging in Regulated Activity with adults is also in a Regulated Activity role.

The differences in work with vulnerable groups and which Disclosure product can be accessed are illustrated below with some sample role scenarios:

|  |  |
| --- | --- |
| **Enhanced Disclosure without Barred List checks** | **Enhanced Disclosure with Barred List checks** |
| When working with Children:   * A person has been asked if they would assist with the children’s choir. They will be subject to supervision (as defined by the Church – see Guidance) by the Choir Leader and therefore they will not be in a Regulated Activity role. An Enhanced Disclosure is required however no check of the Barred List for Children can be made; * A person has expressed a willingness to help out with the parish Youth group and be on the rota. They will be subject to supervision by a Youth Leader so they will not be in Regulated Activity therefore an Enhanced Disclosure is obtained but a check cannot be made of the Barred List for Children. | When working with Children:   * A person who is willing to apply for the soon to be vacant Group Leader role for the parish Children’s Liturgy. The Group Leader will not be supervised and will be supervising the other helpers therefore they are applying for a Regulated Activity post. An Enhanced Disclosure must be obtained ensuring that the Barred List for Children is checked; * A number of parish members are asked to join the rota to drive the minibus to transport children from the parish to organised events. This is Regulated Activity and therefore an Enhanced Disclosure with a check of the Barred List for Children must be obtained. |
| When working with Adults:   * A Parish group is set up to provide support for mums suffering from post-natal depression. The Group Leader and any nominated organisers can be checked via an Enhanced Disclosure. The nature of the activity does not qualify as Regulated Activity. It is therefore inappropriate to seek a check of the Barred List for Adults; * A parish runs a weekly luncheon club for housebound or isolated parishioners. This activity requires that parish volunteers transport parishioners to and from the lunch club however the nature of the service does not meet the Regulated Activity definition of “personal care” nor are those transporting the parishioners engaging in Regulated Activity as they are not conveying to health or social care environments. Those assisting with the lunch club can be checked at an Enhanced Disclosure level but a check of the relevant Barred List is not legally permissible; * A Catholic Charity is set up to provide advice to those with substance abuse issues. An Enhanced Disclosure can be obtained. As the nature of the work no longer meets the new Regulated Activity definition however a check of the Barred List for Adults is not possible. | When working with Adults:   * A nurse appointed to assist providing health care services to a person going on the Lourdes Pilgrimage will be in Regulated Activity as they are providing health care and personal care services to a person over the age of 18. Therefore the relevant check of the Barred List for Adults must be obtained in addition to the Enhanced Disclosure before the person can be appointed; * A prospective SVP member is expected, as stated within the role description, to be asked by those they visit on a regular basis to pay the occasional bill or grab some essential food items on behalf of the person they are visiting. As such this type of service is Regulated Activity. An Enhanced Disclosure with a check of the Barred List for Adults is necessary before the person is appointed to post; * A regulated Care Home run by a Religious Order is appointing Care Staff who are expected to aid residents who are unable to feed themselves with eating. As such this type of assistance with eating qualifies as “personal care” and therefore is Regulated Activity. An Enhanced Disclosure including a check of the Barred List for Adults is necessary before the person is appointed. |

**5.** **What about Obtaining Disclosures for those Roles within the Church that are Considered to be “Positions of Trust”?**

As of October 2009 “positions of trust” ceased to exist and was replaced by “Specified positions of responsibility”.

**6.** **Appointment Process Summary for Clergy, Religious, new Employees and Volunteers**

NB. For those recruiting to a paid post within a Diocese, it is crucial that the person recruiting for the post engages with the Safeguarding Office at the first stage or refers to CSAS for guidance before initiating the process.

**6.1** **Advertising or Making the "vacancy" known**

If the vacancy is for a paid post the advert for the vacancy must state that the role is subject to:

* An Enhanced Level Disclosure (and state if a Barred List check is required where applicable) for the successful applicant;
* Satisfactory references.

If the "vacancy" for a voluntary role in the church is advertised in the parish newsletter or on a notice board for example, it must state that the role is subject to:An Enhanced level Disclosure (and include if a check of the relevant Barred List is required where applicable);Satisfactory references.

If a plea is made by the parish for volunteers, or a person is asked to undertake a role, the requirement for an Enhanced level Disclosure must be made known to the individual at the earliest opportunity.

If an individual or parishioner comes forward and offers their services to helping with a voluntary activity in the Church, again the requirement for an Enhanced level Disclosure must be advised at the earliest opportunity.

**6.2** **Application Form (also known as "personal details" form)**

An application or "personal details" form must be completed by all those seeking to work with vulnerable groups and MUST be used without any modifications unless approved by CSAS.

The standard mandatory form is available from the Forms Library for volunteers and sample application forms and reference requests are contained within the Forms Library contained in this Chapter however it is advised that due to the changing aspects of Employment Law, appropriate assistance is obtained to ensure application forms are compliant with legislation. Please refer to CSAS for guidance around the required items to be included in connection with DBS Code of Practice.

The individual should also be advised where they can locate the Policy Statement on Recruitment of ex-Offenders.

**6.3** **Safeguarding Self Declaration (SSD) - also known as Confidential Declaration Form**

Anyone who is seeking to work with children or adults whether in a paid or unpaid capacity must be provided with the opportunity to self-disclose relevant conviction information. This is a DBS Code of Practice requirement and applies to anyone being asked to have an Enhanced Disclosure therefore the Self Declaration is equally a requirement for Clergy and Religious in active ministry.

**6.4** **Discussion/Informal Chat or Interview Regarding Role and Person's Suitability**

For unpaid posts, the prospective volunteer should have some opportunity to discuss the role, expectations and time commitment involved with the group leader; Parish priest or relevant person. This discussion is also the opportunity for that person's suitability to be assessed i.e. attitude and experience.

**6.5** **ID Verification**

**For Clergy, Religious and unpaid posts:**

The documents presented should be checked for signs of tampering or fraud and checked against the Identity Verification Form completed by the applicant. The form must be signed off by the [ID Verifier](http://www.csasprocedures.uk.net/local_keywords/id_verifier.html) to confirm which documents were produced, acceptable and within the required validity period. The original documents should also be photocopied and attached to the ID verification form and retained in order to be used for DBS application purposes.

This process ensures that the individual doesn't have to present documents on more than 1 occasion; protects the Counter-Signatory in those instances where the Counter-Signatory has not seen the original documents themselves but via a local ID Verifier and also ensures that any queries by the DBS on documentation reference numbers can be easily resolved.

**For ALL Disclosure applications:**

Please note that it is important to ensure that sufficient evidence of identity is provided and only original documentary evidence can be accepted. The documents presented at interview should be checked for signs of tampering or fraud and checked against the Identity Verification Form completed by the applicant. The form must be signed off by the ID Verifier to confirm that all documents listed by the applicant were produced, acceptable and within the required validity. The original documents should also be photocopied and attached to the ID verification form and retained in order to be used for DBS application purposes.

Please note the ID verification process changed in line with DBS and Home Office requirements with effect from 28th May 2012. The new process includes the potential for an external ID validation check to be carried out and in some circumstances may require that the applicant presents themselves for fingerprinting.

It is important for those involved in checking the DBS application form and verifying the identity of the applicant to note, that they must not attempt to amend the application form without the applicant’s knowledge and agreement, as it will invalidate the declaration by the applicant and may breach data protection legislation.

**6.6** **References**

References are valuable in assessing the person's suitability to undertake the specifics of the role.

**For unpaid posts:** The use of the standard national reference form ensures that all necessary questions are asked. This can be located in the Forms Library.

**For all posts:** References from relatives or the current parish priest or deacon are not acceptable. All references should be sought directly from the referee; generic references or those addressed "To whom it may concern" are not acceptable. Those appointing are responsible for satisfying themselves that references are authentic. Negative or ambiguous statements in references must be followed up by the appointer e.g. Parish Priest, Diocesan HR or Care Home Manager, and recorded.

In the event that any concerns arise on receipt of a reference please seek guidance from the Safeguarding Coordinator in the local Safeguarding Office or refer to CSAS.

**6.7** **Disclosure Application Form**

The applicant (if deemed suitable) then proceeds to completion of the DBS Disclosure application. If the individual indicates they have an appropriate Disclosure and have subscribed to the Online Updating Service, please see [Catholic Church Guide for individuals regarding the Online Update Service](http://www.csasprocedures.uk.net/pdfs/online_update_service.pdf). The Counter-Signatory in each authorised office of the Safeguarding structure determines the best mechanism for supplying the Disclosure Application. The DBS provide guidance notes for applicants and also guidance for Counter-Signatories on the correct completion of the form.

Particular attention should be paid to documentary evidence provided; full and complete 5 year address history and all Registered Body and Counter-Signatory reference numbers are quoted.

The completed Disclosure Application should be presented to the Safeguarding Representative; Religious person or appropriate authorised and trained ID verifier to ensure that the documents presented previously are acceptable and appropriate for DBS Disclosure purposes. Particular attention should be given to name variations and changes ensuring that the DBS form captures any other names by which the applicant has been known.

The Disclosure Application is passed to the Counter-Signatory for checking, completion and signature and entry onto the CSAS National Database prior to submission to the DBS. Administrative staff can undertake the initial checking of the form and database entry if they have appropriate job descriptions and have signed a Confidentiality Agreement. See the Confidentiality Agreement within the Forms Library.

In the event that you have an applicant who has already had a Disclosure Certificate - if the Disclosure was obtained via another Registered Body, please refer to the information on the Online Updating Service and Online Status Checks.

**7.** **Guidance for Conducting Interviews Appropriately**

The interview or informal discussion provides an opportunity for the individual to understand the requirements of the role; expectations, training and support provisions.

Additionally it provides the opportunity for the Church to establish the individual's:

* Commitment to the role;
* Suitability for the role;
* Motivation for applying;
* Experience and prior involvement in similar activities.

In addition to the above, it provides a convenient time to discuss any anomalies in identity documentation for example dates of birth; spellings of name.

There are many free resources available concerning interview techniques in order to get the best out of the individual.

**8.** **Correct Completion of Applications for DBS Disclosures**

Please note that there is full guidance (for applicants; ID verifiers and Counter-Signatories) on how to complete the application form available from the DBS website.

The guidance available from the DBS includes information regarding how to submit applications where the applicant has resided overseas in the last 5 years; has travelled or is a student in addition to a number of other circumstances.

**Role Titles to be used when submitting an application for a Disclosure\*:**

With effect from May 2013, please note that line X61 of the DBS Application Form must be completed as follows:

**How to complete X61:**

Please complete the field as follows:

* **X61 line 1**: You must now include the relevant workforce(s). Choose the appropriate:
  + Child Workforce;
  + Adult Workforce;
  + Child and Adult Workforce.
* **X61 line 2**: Enter a description of the ‘position applied for’ up to 30 characters.

*Please note that the Workforce must be stated on the Disclosure Application to enable the individual to make use of the Online Updating Service. Failure to include the relevant workforce on the first line of X61 will lead to delays in the application being processed as the Police Disclosure Units will query which workforce the role will be working with and prohibit the individual from using the Disclosure for similar roles with other organisations.*

**Some illustrations are provided below as guidance:**

* Children’s Liturgy – Line X61 should show **CHILD WORKFORCE** on the 1st line and **CHURCH** **MINISTRY** on the 2nd line;
* Care Staff (in a Care Home) – Line X61 should show ADULT WORKFORCE on the 1st line and CARE WORKER on the 2nd;
* For Clergy and Religious – Line X61 should show CHILD AND ADULT WORKFORCE on the 1st line and either PRIEST or RELIGIOUS BROTHER/SISTER on the 2nd.

**GUIDANCE ON ROLE TITLES ON THE DISCLOSURE FORM:** Role titles on the DBS application form MUST indicate the nature of the role and the contact involved so the eligibility of the Disclosure is apparent for DBS processing purposes.

Therefore, for paid post-holders, ensure that the role indicates the nature or the element that makes it eligible for the Disclosure, as opposed to the official job title which may not make the eligibility apparent to the DBS and Police Disclosure Units. The DBS can query applications that they believe do not appear to be eligible for a Disclosure OR will raise queries with CSAS as the Registered Body as part of the assurance process to ensure that each application has been properly assessed for Disclosure eligibility.

**VOLUNTEER ROLES:**

For **ALL voluntary roles** within the Church, the role title on the Disclosure Application Form should be entered as "**Church Ministry**". Please note that "Volunteer" must not be stated on the Role Applied For on the Disclosure application.

This title must be used as the nature of the work or contact will not be understood by the local Police forces when assessing Church role titles like Children's Liturgy; Eucharistic Minister etc. for relevant criminal conviction information.

\*When CSAS is operating as an Umbrella Body on behalf of Catholic organisations with their own charitable status, it is for the "employing" organisation to determine the role title. CSAS Counter-Signatories can challenge the role on the basis of eligibility however the "employer" dictates the role title for DBS Disclosure purposes.

**9.** **When does a Disclosure need to be Redone?**

Due to the extent of legislative changes that have been underway there is no National Policy on Disclosure rechecks within the Catholic Church of England & Wales at the current time.

A new Disclosure is required for those

* Who had a Disclosure obtained via another Registered Body prior to 17th June 2013 and therefore their Disclosure is not available for use with the Online Updating Service; or
* Now looking to work in Regulated Activity who did not previously; or
* Where the previous Disclosure is not the appropriate product type; or
* Where a change of workforce is occurring i.e. formerly working with children and now looking to work with adults or vice versa.

Please note that where the Church has obtained a relevant Disclosure, via CSAS as the Registered Body, or verified via the Online Updating Service a suitable and relevant Disclosure for an individual a further Disclosure is **not** required in the following circumstances:

* Continuation of the same role previously performed but moving parish or Diocese;
* Applying for a role with no greater level of responsibility compared to the role against which they were originally subjected to a Disclosure;
* Members of a Religious Congregation against the relevant group/s and the relevant Disclosure level, who are temporarily working within a Diocese, do not need to be rechecked via the Diocese as the previous Disclosure is valid as it was obtained via CSAS as the Registered Body.

**10.** **Identity Verification**

**10.1** **Overview of ID Requirements and Obligations on Registered Bodies**

Identity Verification is and has always been a critical aspect of the Safer Recruitment and DBS application process. The [DBS Code of Practice](http://www.csasprocedures.uk.net/local_keywords/dbs_code.html) requires that CSAS as a Registered Body of the DBS (\**which extends to its authorised Counter-Signatories located in Safeguarding Offices and all those approved and appointed as Parish Reps/Identity Verifiers*) adhere to the following obligation:

“Registered Bodies must accurately and comprehensively verify the identity of the applicant prior to the submission of a DBS application”.

The statutory conditions attached to this component of the DBS Code of Practice means that Registered Bodies (\*see point above) must adhere to the requirement that prior to submitting a DBS application the identity of the applicant is verified in accordance with the identity checking guidelines issued by the DBS.

With this in mind, as of 28th May 2012, the DBS revised their Identity Verification requirements following a directive from the Home Office to enhance the ID checking process. The aim of the revised ID requirements is to reduce any possible abuse of the system and improve public protection. The Home Office anticipate that these revisions of practice will make it more difficult for individuals to conceal previous criminal records by changing their name.

The revised ID process requires applicants to provide documents that they have acquired through “undergoing stringent identity verification with the document issuers, such as the Identity and Passport Service or the Driver and Vehicle Licensing Agency (DVLA).”

In practice this means that the document types now deemed acceptable for verifying an individual’s identity are very specific and prescriptive. There are now 3 designated routes through which a person’s identity can be validated for DBS purposes and full details about the 3 ID verification routes and how to check validity of original documents is provided in [Home Office Guidance](http://www.csasprocedures.uk.net/chapters/g_id_verif_faqs.html).

The Identity Verification form (see Forms Library) has been updated to reflect the revised acceptable documents and which category of document they fall under. The ID Verification form is required to be completed by all DBS applicants indicating which documents they will produce and should be provided to the ID Verifier to check against the actual original documents presented by the applicant.

The ID Verification Form must be signed off (once the documents have been checked for signs of tampering, fraud and to ensure they are in date) by the ID Verifier to confirm the documents produced are acceptable and their validity. The original documents should also be photocopied and attached to the ID Verification Form which is passed to the relevant Counter-Signatory to progress with the DBS application process.

The photocopying requirement ensures that the individual does not have to present documents on more than 1 occasion, protects the Counter-Signatory in those circumstances where the Counter-Signatory has not seen the original documents themselves but via a local ID Verifier and also ensures that any queries received from the DBS on documentation reference numbers for example can be quickly and easily resolved.

It is important for those involved in checking the DBS application form and verifying the identity of the applicant to note, that Registered Bodies\* (\*see earlier definition) must not attempt to amend the application form without the applicant’s knowledge and agreement, as it will invalidate the declaration by the applicant and may breach data protection legislation.

**Obligations placed on Registered Bodies; their Counter-Signatories and authorised, trained and appointed ID Verifiers are provided below per DBS guidance.**

Registered Bodies must:

* Follow the three route ID checking process as outlined in the guidance using the list of Groups 1; 2a and 2b documents;
* 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;
* Ensure that the applicant provides details of all names by which they have been known;
* Ensure that the applicant provides details of all addresses where they have lived in the last five years;
* Ensure that the application form is fully completed and the information it contains is accurate.

If there are any discrepancies in the information provided by the applicant and/or the identity documents supplied, and fraud is not suspected, please seek clarification from the applicant. Failure to do this may compromise the integrity of the DBS service and introduce risk into your recruitment or licensing arrangements.

Registered Bodies must not attempt to amend the application form without the applicant’s knowledge and agreement, as it will invalidate the declaration by the applicant and may breach data protection legislation.

Please note that:

* 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 (see further guidance provided on recent changes of name);
* One document must confirm the applicant’s date of birth as recorded in Section A;
* You must ensure that the applicant declares all previous change of name, 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 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. do not 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.