

## Revised and enhanced identification checking guidelines, effective from 28 May 2012

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## Revised and enhanced identification checking process from 28 May 2012

From 28 May 2012, the CRB introduced new identity (ID) checking guidelines. These new guidelines will apply to all applications for a CRB check.

The new guidelines will run in parallel from 28 May 2012 with the existing ID checking guidelines until 31 August 2012, when the existing guidelines will cease to apply.

The enhancement is being introduced so that the CRB's identity checking process is strengthened to improve public protection. In particular, the changes will make it more difficult for individuals to conceal previous criminal records by changing their name. These changes are part of an on-going improvement process that will enable easier detection of undeclared changes of name in the future.

### Identification checking process

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

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 CRB 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 CRB 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 below for guidance 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.

- 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.

When applying for Lead or Countersignatory status, at least one document must show the applicant's signature.

### What process should I follow to check an applicant's ID?

You should follow the three routes as outlined below.

#### 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; one of which must verify their 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.**

#### **NOTE – EEA Nationals (Non-UK):**

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 2 further documents.

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

#### **NOTE - Non-EEA Nationals:**

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

## Route Two

The applicant must produce:

- 3 documents from Group 2 comprising 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 NOTE: Full details of the external ID validation check are on pages 6 and 7 of this guidance.**

If you have endeavoured to use Route Two, but have been unable to validate the applicant's identity successfully, you may consider proceeding to Route Three.

**Please be advised that** Route Three should only be used in circumstances once you have fully explored with the applicant why their identity has not been successfully validated via Routes One or Two. 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 as it is the Registered Body's responsibility to establish the true identity of the applicant through the examination of a range of documents as set out in this guidance.

Should you still be unable to validate the applicant's identity using Routes One, Two or Three, then you should indicate this on the application form at Box W59 and return the form to the CRB. **The applicant will then need to be sent for fingerprinting by the Police, which you should be aware is likely to cause delay to the CRB application process and subsequently to your recruitment processes.**

## Route Three

**ALL Registered Bodies must have exhausted Route One and should have endeavoured to have accessed an external validation check (Route Two) before you consider processing them via 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 comprising of:
  - 1 document from Group 2a; **and**
  - 3 further documents from Group 2a or 2b; one of which must verify their current address.

If the applicant **fails** to produce the required document set at Route Three, they will need to be sent for fingerprinting by the Police which you should be aware is likely to cause delay to the CRB application process and subsequently to your recruitment processes.

### What if I cannot establish the applicant's ID using one of the three routes?

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.

### List of Valid Identity Documents

#### Group 1 – Primary Trusted Identity Credentials

- Current valid Passport.
- Biometric Residence Permit (UK).
- Current Driving Licence (UK) (Full or provisional) Isle of Man /Channel Islands;
  - Photo card only (a photo card is only valid if the individual presents it with the associated counterpart licence; except Jersey).
- Birth Certificate (UK and Channel Islands) - issued at the time of birth;
  - Full or short form acceptable including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces. (Photocopies are not acceptable).

#### Group 2a – Trusted Government/State Issued Documents

- Current UK Driving licence (old style paper version).
- Current Non-UK Photo Driving Licence (valid only for applicants residing outside of the UK at time of application).
- 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).
- Marriage/Civil Partnership Certificate (UK and Channel Islands).
- Adoption Certificate (UK and Channel Islands).
- HM Forces ID Card (UK).
- Fire Arms Licence (UK and Channel Islands).

#### Group 2b – Financial/Social History Documents

- Mortgage Statement (UK or EEA)\*\* (Non-EEA statements must not be accepted).
- Bank/Building Society Statement (UK or EEA)\* (Non-EEA statements must not be accepted).
- Bank/Building Society Account Opening Confirmation Letter (UK).
- Credit Card Statement (UK or EEA)\* (Non-EEA statements must not be accepted).
- Financial Statement \*\* - e.g. pension, endowment, ISA (UK).
- P45/P60 Statement \*\* (UK & Channel Islands).
- Council Tax Statement (UK & Channel Islands). \*\*
- Work Permit/Visa (UK) (UK Residence Permit). \*\*
- Letter of Sponsorship from future employment provider (Non-UK/Non-EEA only – valid only for applicants residing outside of the UK at time of application).
- Utility Bill (UK)\* – Not Mobile Telephone.
- Benefit Statement\* - e.g. Child Allowance, Pension.
- A document from Central/ Local Government/ Government Agency/ Local Authority giving entitlement (UK & Channel Islands)\*- e.g. from the Department for Work and Pensions, the Employment Service , Customs & Revenue, Job Centre, Job Centre Plus, Social Security.

- EU National ID Card.
- Cards carrying the PASS accreditation logo (UK and Channel Islands).
- Letter from Head Teacher or College Principal (16/17 year olds in full time education – (only used in exceptional circumstances when all other documents have been exhausted).

**Please note:**

If a document in the List of Valid Identity Documents is:

- Denoted with \* - it should be less than three months old.
- Denoted with \*\* - it should be issued within the past 12 months.
- Not denoted – it can be more than 12 months old.

### External validation service

#### What is an external ID validation check?

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 CRB's services we request that Registered Bodies pursue a check that is aligned to the following standard:

- LEVEL 2 (Remote) – as detailed in '[HMG's Minimum Requirements for the Verification of the Identity of Individuals/Version 2.0/January 2003](#)'.

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 'Level 2 (Remote)' check provides **substantial assurance** that the registrant's real world identity is verified.

It is important to note that standards set out within 'HMG's Minimum Requirements' are widely acknowledged within the ID checking industry. Countersignatories will not be required to have any in-depth knowledge of what a 'Level 2' check involves. Those organisations who provide the check, will be in a position to give an assurance that they comply with the standards described within the guidance.

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

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

We are aware that Call Credit Group, Equifax, Experian, and GB Group are working towards the provision of ID validation services tailored for CRB purposes. Final dates for launch of these service may vary and you should contact them directly to establish when they will commence.

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

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

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

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

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

The following provides general information on how to access a suitable external ID validation check. This is provided as a guide and is not exhaustive.

### **Step 1**

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

### **Step 2**

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

We require an ID validation check which:

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

### **Step 3**

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

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

### **Step 4**

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

### **Step 5**

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

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

### How can I check driving licences?

Do not accept licenses, 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.

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

ROBIN 757025 CJ99901  
NNNNN YMMDDY IICCCC

- N = 1st five letters of the surname (if the surname begins MAC or MC it is treated as MC for all).
- Y = YEAR of birth.
- M = MONTH of birth (In the case of a female, the number represented by the first M will have the value 5 added to the first digit e.g. a female born in November (i.e. 11) would display '61' in the MM boxes or if born in February (i.e. 02) would display '52').
- D = DAY of month of birth.
- I = Initial letter of the first two forenames - if only one, then 9 will replace the second letter. If the licence indicates that the applicant has a middle name, ensure that one has been provided in Section A.
- C = Computer generated.

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

### What if the applicant has been adopted?

Registered Bodies should inform applicants that if they were adopted before the age of 10, they do not need to provide their surname at birth in Section A of the CRB application form, they should give their adoptive name in this section.

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

### What if the applicant has changed their name recently and cannot provide ID documents in this new name?

Documents in a previous name can be accepted ONLY where the applicant can provide documentation supporting a recent change because of:

- Marriage/civil partnership (marriage/civil partnership certificate).
- Divorce/civil partnership dissolution (decree absolute/civil partnership dissolution certificate).
- Deed poll (Deed Poll certificate).



In these instances, you must:

1. Return a 'Continuation Sheet' with the application form clearly stating:
  - Current and previous names.
  - Date of the change.
  - Reason for the change.
  - The document you have seen to support this change.
2. Ensure that all 'Previous names' and 'Dates used' are recorded in Section A (Additional Personal Details).

### What should a Registered Body do if they 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.

- To report suspected identity fraud [click here](#)
- For further information on identity fraud [click here](#)
- If you suspect identity fraud once a CRB check has been submitted, you must [contact the CRB](#)

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 Border Agency website](#) and the UK Border Agency Employer Helpline on 0845 010 6677.

The following guidance applies to individuals applying for a CRB check and those applying for Lead or Countersignatory status.

### 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 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 general procedures as above.

[Basic UK passport checking](#) (PDF 1416 kb)

### Checking a photo driving licence

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

[Your new driving licence](#) (pdf 199 kb)

[UK Driving Licence level 1 security features](#) (pdf 158 kb)

### Checking an old style driving licence (no photograph)

Remove the document from the plastic wallet and check that it is printed on both sides. It should have a watermark visible by holding the licence up to the light and there should be no punctuation marks in the name or address. The 'Valid To' date should be the day before the bearer's 70th birthday (unless the bearer is already over 70). The 'Valid To' date can therefore be cross-referenced with the applicant's date of birth detailed in Section A.

### Checking a birth certificate

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

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

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

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

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

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

### 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 feint 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.

### Other forms of identification

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.

### Where to go for help

The PRADO website is provided by the Council of European Union. Employers are able to use this website to identify the basic safeguards contained in European documents and a few more other nationality documents.

[The Public Register of Authentic Identity and Travel Documents Online](#) (PRADO website)