



## Processing DBS Checks in our Parish

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### Overview:

The following guidance should be read in full before starting to process DBS applications for the first time. However, you will also need to refer to other documents and web pages throughout the process and these are included as hyperlinks within. The majority of the information held within this guidance can be found in the [Disclosure and Barring Service \(DBS\)](#) section of our website. However, if you have any queries, please contact the [Safeguarding and DBS Administrator](#) who will be able to assist you.

In the Diocese of Exeter, DBS checks are carried out online and processed on behalf of the Diocese by an intermediary provider called [Thirtyone:eight](#). Thirtyone:eight manually check each application to ensure the information entered on it is correct before forwarding it to the DBS for processing.

DBS Checks for anyone holding the Bishops licence, commission, authorisation or permission (Clergy, PTO, Readers, Licenced Lay Ministers) and ordinands are always carried out by EDBF staff. DBS checks for parish staff and volunteers are undertaken by Parish DBS Evidence Checkers (referred to as 'Evidence Checkers' throughout this document.)

Each parish/church/mission community should have at least one Evidence Checker who will be able to process DBS applications, although if possible, having multiple Evidence Checkers is preferred.

Every parish/mission community will be given its own unique 'organisation reference' number which the Parish Evidence Checkers in that parish will use to process DBS checks. If necessary, individual churches within a parish/mission community can have their own DBS Evidence Checkers and in these instances the church will be given a new 'organisation reference' number so they can process DBS checks independently of the parish.

## Getting Started:

- a. Before a parish or other appointing body can carry out DBS checks, they must recruit one or more Evidence Checkers following the usual [Safer Recruitment and People Management Guidance](#). Multiple Evidence Checkers can provide support for one another and cover if someone is ill or on holiday. If you have difficulty recruiting Evidence Checkers, it makes sense to work on DBS checking as a benefice or mission community, with a couple of Evidence Checkers covering the parishes within.
- b. Nominated Evidence Checkers need to have internet access and basic computer skills (for example, be capable of filling out online forms and sending emails with attachments). Further information about the role of Parish DBS Evidence Checker along with a role description and how to register as one can be accessed in the [Disclosure and Barring Service \(DBS\)](#) section of our website. Additionally, the Diocese subscribes to the DBS Code of Practice. Therefore, before requiring a volunteer or employee to apply for a DBS check via Thirtyone:eight, PCCs should formally minute their decision to observe the DBS Code of Practice.
- c. Once recruited an '[Parish Evidence Checker Recruiter Registration Form](#)' will need to be completed, counter-signed by the parish priest (or, in the case of a vacancy, a Churchwarden) and [emailed](#) to the Safeguarding and DBS Administrator. Having done so, the new Evidence Checker will be sent their login details and guidance from Thirtyone:eight on how the system operates. They will also receive a subsequent email from the Safeguarding and DBS Administrator with relevant documents to use to ensure each DBS application is processed and recorded appropriately at parish level. All DBS Evidence Checkers must undertake the 'Safer Recruitment' e-learning module which can be accessed via our [Safer Recruitment](#) web page before commencing their role.
- d. If there is only one Evidence Checker in your parish, they will automatically be the 'Lead Recruiter' Evidence Checker and will receive an email notification when each application they have processed has completed. If there is more than one Parish Evidence Checker the subsequent Evidence Checkers (known as Applicant Managers) will have the same level of access to the Thirtyone:eight system as the Lead Evidence Checkers but won't receive the email notifications when an application has completed. Parishes can change who they want to be the Lead Evidence Checker by emailing the Safeguarding and DBS Administrator.

## The Application Process:

Please read the following detailed guidance in full. Subsequently, a brief overview of the whole DBS application process is available in the [Parish Evidence Checker Flow Chart](#) which can be referred to as a 'quick guide' as necessary.

1. In the first instance, the [Responsible Person](#) must let the Evidence Checker know who needs a DBS application, why they think they need it and what activities the applicant will be undertaking. This information will help the Evidence Checker ensure they request the correct level of DBS check for the applicant.
2. Establishing who needs what level of DBS check (DBS eligibility) can be a little complicated at first. However, information about DBS eligibility can be found in the [Thirtyone:eight Recruiter Resources](#) page where you will find an interactive eligibility guide. Use the guide to work through the questions to establish what level of DBS check each role requires. Additionally, [Safer Recruitment and People Management](#) also includes some extra guidance (specifically in Section 9 within the 'Toolkit' section) on DBS eligibility. However, if you are not sure, please contact the Safeguarding and DBS Administrator or Thirtyone:eight for advice.
3. All Parishes, mission communities or other local groupings are automatically registered to process Basic (from 4<sup>th</sup> April 2023) and Enhanced DBS checks.
4. Before an enhanced DBS application can be started a parish **Confidential Declaration** form **must** be completed prior to the application being processed. Parish Confidential declaration forms can be downloaded [here](#). **Please note: It is illegal to make an application for an enhanced DBS check with barred list checks for anyone who is barred from working with either children and/or vulnerable adults. Therefore, the purpose of the Confidential Declaration is to:**
  - *enable the diocese/parish to be sure it is legally allowed to apply for the application without incurring a fine and large financial penalty and*
  - *provide the applicant with an opportunity to declare any relevant information prior to the application being processed and*
5. If an applicant discloses **any** information on their Confidential Declaration Form, this **must** be shared and discussed with the Safeguarding Team before progressing any further with the application.
6. If the applicant requires a Basic DBS application, they will not need to complete a Confidential Declaration form.
7. If the applicant has lived in any country except the UK for 12 months or more (whether continuously or in total) in the last 10 years, while aged 18 or over, in addition to a UK DBS check they will also require an overseas DBS check (or 'Statement of Good Conduct') from the country/countries they have resided in during this period. Please contact the Safeguarding and DBS Administrator for guidance.
8. Once eligibility and the correct level of check have been established, the Evidence Checker will email the applicant with an invitation to start their online application (see Appendix A or access a downloadable version [here](#)).

9. In the invitation, please make sure you ask the applicant to complete the correct application type (Basic or Enhanced). Double check they have done this when you are checking their ID and processing the application.
10. In the invitation, please ensure the role titles you and applicants use closely reflect those outlined in the table in the Thirtyone:eight Recruiters guide. If necessary, multiple roles can be included, such as 'Verger/Pastoral Worker' (for example).
11. The email invitation should include a link to the Thirtyone:eight Recruiter and Applicant guides which are now only available online [here](#). If the applicant requires an Enhanced DBS check, the invitation should also have a [Parish Confidential Declaration Form](#) attached. Confidential Declarations are required for all those having a new or renewed Enhanced DBS check. They are not required by those who only require a Basic DBS check.
12. Lastly, please also outline in the invitation email which type of ID checking they will be required to undertake – manual or digital.
13. The applicant must then let the Evidence Checker know they have completed their part of the online application.
14. The Evidence Checker must then log into the Thirtyone:eight system, locate the application and in the 'Check ID' section choose to check the applicants ID documents by one of two routes:
  - **Manually** – in this scenario the Evidence Checker will need to meet with the applicant and see their original ID documents in person. There are strict criteria about what three ID documents can be used and the timescales for using them. You can find out which ID documents are acceptable [here](#). *If you can easily see people face to face to check their ID documents, this should be your default option.*
  - **Digitally** – in this scenario a link will be sent by the Thirtyone:eight system to the applicant who then digitally uploads their ID documents and a selfie onto the Thirtyone:eight system. Details about the documents required can be found at '[List of documents required for a digital identity check](#)'. The ID documents are then independently verified by the Thirtyone:eight certified identity service. This should take anywhere between a few minutes to one hour maximum. The Lead Evidence Checker will then receive an email notification that the ID Check has been completed. The Evidence Checker will also be able to see that the digital ID check has been completed and can proceed to complete Section Y. *If you cannot easily see people face to face, and the parish are prepared to cover the cost of the digital ID check, you can use this option. You can also use the digital ID checking service to process your own DBS application (if eligible) and that of your relatives. However, please note:*
    - i. Each digital ID check costs £4.98 (£4.15+VAT) and the parish will be required to pay this cost by forwarding the relevant payment to EDBF. See 'Who pays for a DBS Check' below. *Any digital ID checks or 'Right to Work' checks requested in error will still incur a full charge and the parish will be required to pay the cost.*
    - ii. Only people with current and valid passports and driving licences will be able to use digital ID checking.
    - iii. You should not use digital ID checking if someone has recently moved or has little to no digital/finance footprint at their current property as this could result in the digital ID check failing. A good verifiable digital/finance footprint at the current address could include credit cards, finance loans (such as car or pay monthly phone contracts) and the applicant being registered on the electoral roll.

- iv. If the digital ID check fails, we will still be charged for the service and the applicant will still be charged.
  - v. Thirtyone:eight now also provide 'Right to Work' checks at an additional cost of £4.98 (£4.15+VAT) . However, you will *not* normally need to request a 'Right to Work' check and so should *not* need to use this option.
15. If the DBS application is for paid staff or is a Basic DBS, the Evidence Checker will need to arrange for the Parish/church to make payment to EDBF before the check is completed. Further details concerning payments are outlined below.
16. When completing Section Y please also fill out the 'Additional Information' to provide some rationale concerning the level of DBS check you have requested. **Please note: Please make sure you accurately complete the 'Volunteer – Y/N' section. If you process an enhanced application for a volunteer but do not set this to 'Yes' your parish will be charged for the check.**
17. You will then need to 'approve' the application before it can transfer to Thirtyone:eight for checking. **Please note: Once you have chosen to 'approve' a DBS application it may not be possible to be withdrawn and/or edited.**
18. Thirtyone:eight then receive the approved application electronically and the application is manually checked.
19. If an Evidence Checker requests a level of DBS check for which the applicant does not appear to be eligible, Thirtyone:eight will request clarification about this through the online system. To do this Thirtyone:eight will send an email notification of this request for further information to the Evidence Checker who processed the application. The Evidence Checker must then log back into the online system to respond to the query. A red flag will appear next to the queried application and the Evidence Checker will need to access the message through the 'notes' section of the application, providing a response in a timely manner to clarify why they have requested that level of check. **Please note: Queried applications which are not resolved quickly risk being withdrawn by Thirtyone:eight.**
20. Once the application has been checked and any queries resolved, Thirtyone:eight will subsequently transfer the application securely to the Disclosure and Barring Service using the DBS E-Bulk system.
21. Whilst the DBS application is processing the Evidence Checker can track its progress by clicking on the 'Track' option next to the application. **Please Note: DBS applications can take anywhere from 24 hours to 3 months (sometimes longer) before they are complete although in most cases the delay is no more than a few weeks. The delays can occur for a variety of reasons including the number of places the person has lived, the capacity of the police team checking their information, any offending history the applicant may have or (if the applicant is having a home-based check) the checks undertaken on any adults they reside with. If the application remains incomplete after it has been with the DBS for 60 days, we can ask Thirtyone:eight to contact the DBS and find out what is happening, but not before. If you are concerned about the length of time a check is taking to complete, please contact the Safeguarding and DBS Administrator.**
22. When the application has completed, the Lead Evidence Checker in the parish is sent an email confirming this and the applicant is sent their printed certificate, which must be shown to the Evidence Checker who processed their application.

23. The Evidence Checker must make a record, to be retained by the parish/church, of all those who require DBS checks, the date of their certificate and the certificate number. Renewals should be monitored by the parish and undertaken every three years where required to ensure cover continues.
24. Any 'Blemished' checks (those which identify a disclosure of some kind) will be highlighted to the Safeguarding and DBS Administrator via the Thirtyone:eight system. The Administrator will then contact the applicant, the Evidence Checker who processed the application, the Parish Safeguarding Representative and the incumbent (or Churchwarden in the event of a vacancy) to advise them of the next steps.
25. Following this a member of the Safeguarding Team will contact the applicant and the church to undertake a risk assessment to establish if the applicant can proceed with the role they have applied for. Having a blemished DBS does not automatically prevent someone from being a volunteer or member of staff and each circumstance and situation will be assessed on an individual basis.

**Please note and remember:**

- All Evidence Checkers are responsible for checking the applicants ID, completing Section Y and approving the application. Therefore, Evidence Checkers will need to check each online application carefully before submitting it, ensuring the right level of check has been requested and that where applicable payment to EDBF has been made and respond to any queries from Thirtyone:eight in a timely manner.
- Everyone requiring an enhanced DBS check *must* complete a Confidential Declaration Form and submit it to the DBS Evidence Checker *before* the DBS application is completed by the Evidence Checker. Confidential Declarations must be completed whether the enhanced DBS application is new, or a renewal.
- Please note when using an Evidence Checker from a neighbouring parish the application must be started using the Evidence Checkers own organisation code. Consequently, the application will appear in their list of pending checks. The Evidence Checker will need to provide the parish the check was completed for with a copy of the Parish Information Log once they have performed the application and notify the parish when the application has been completed.
- If you need to undertake a DBS application for yourself or a relative and no other Evidence Checker is available in your parish/mission community, please contact the [Safeguarding and DBS Administrator](#) who can provide the details of other Evidence Checkers near to you.

## Who pays for a DBS check?

### Basic DBS checks:

Basic DBS checks require payment of £18, a fee that is levied by the DBS, regardless of whether the check is for a voluntary or paid role. Basic checks can be undertaken for those in administrative roles or roles of responsibility which are not eligible for an enhanced DBS check. This fee is payable by the Parish.

### Enhanced DBS checks:

Enhanced DBS checks for volunteers (those not receiving any reward, be it payment or a qualification from the role) are free, requiring no fee from the DBS. However, enhanced DBS checks relating to paid workers require payment of a £38 fee levied by the DBS. This fee is payable by the Parish (paid workers only).

### Digital ID Checks for either Basic or Enhanced DBS checks:

Digital ID checks are chargeable at £4.98 (£4.15+VAT). This charge is levied regardless of whether the applicant is employed, or a volunteer. This fee is payable by the Parish.

### Digital 'Right to Work' checks:

You will not normally need to request a 'Right to Work' check at the same time as undertaking a digital ID check. Digital 'Right to Work' checks are chargeable at an additional cost of £4.98 (£4.15+VAT) per check.

The online administration fee payable to Thirtyone:eight for every paid and voluntary application (£5.00) is borne by the Diocese.

**Please note: Please make sure you accurately complete the 'Volunteer – Y/N' section. If you process an enhanced application for a volunteer but do not set this to 'Yes' your parish will be charged for the check.**

### Making Payment:

1. Parishes/appointing bodies are responsible for paying the £18 or £38 application fee to EDBF Limited.
2. Payment must be made to EDBF *before* the application is approved by the Parish DBS Evidence Checker.
3. Payment by BACS is preferred and account details for electronic funds transfers can be obtained from the Safeguarding and DBS Administrator.
4. Notification of each payment made to EDBF in respect of a DBS application must be emailed to the Safeguarding and DBS administrator outlining which church/parish has processed the application, along with the full name of the applicant.
5. The applicants surname and initial **MUST** be used as the BACS payment reference.

If paying by cheque, these should be made payable to 'EDBF Ltd' (Exeter Diocesan Board of Finance) and sent to:

Finance Department (FAO Sharon Deacon)  
EDBF Ltd  
The Old Deanery  
Exeter EX1 1HS.

## Frequently Asked Questions:

### Why do we need to undertake DBS checks?

Under Protection of Freedoms Act 2012 employers:

1. have a duty to refer to the DBS any information about individuals for whom they are responsible who are believed to pose a risk to children or vulnerable adults (where they are working in regulated activity.)
2. must inform the DBS if they dismiss (or intended to dismiss before the individual left the organisation) a member of staff who harmed a child and or vulnerable adult whilst undertaking regulated activity.
3. must not knowingly employ a person who is barred from working with children and or vulnerable adults. If they do, the organisation will be breaking the law and liable to prosecution incurring imprisonment and/or a fine. Likewise, a person who is barred from working with children and or vulnerable adults will be breaking the law if they work or volunteer (or try to) in a regulated activity.

### Who needs a DBS check?

You should consider a DBS check for anyone who will be having significant contact or working with children and/or vulnerable adults, or who may be supervising those who do. You should also consider a DBS check for anyone who is in a position of responsibility within your organisation. They may not be eligible for an enhanced check, but they would be eligible for a Basic DBS check.

### How often to DBS checks need to be renewed?

DBS renewals need to be undertaken every three years. If an enhanced DBS application is required again, a new Parish Confidential Declaration Form must be completed for every Enhanced DBS check.

### What are the differences between Basic and Enhanced DBS checks?

A Basic DBS application only checks information held about the applicant's unspent convictions. It can be requested for those in positions of responsibility who are not having direct contact with children and or vulnerable adults. An enhanced DBS application can only be processed for those who are eligible and will check unspent convictions, spent convictions (subject to filtering), Cautions (subject to filtering) and Police intelligence. If eligible, requests can also be made to see if the applicant is included on either of the adults or children's barred lists.

### Who is eligible for an enhanced DBS check?

You should consider a DBS check for anyone who will be having significant contact or working with children and/or vulnerable adults, or who may be supervising those who do. You should also consider whether members of your PCC, as trustees of a charity, are eligible for enhanced DBS checks (see below). The level of check required depends upon:

1. the role the individual will be undertaking
2. the type of contact they will be having vulnerable adults and or children
3. the frequency of the contact
4. whether they will be directly supervised during the contact
5. where the contact will be taking place
6. if they supervise anyone else who requires enhanced DBS checks.

Unfortunately, there isn't a 'one size fits all approach' to DBS eligibility checking and so each person's eligibility will need to be assessed on an individual basis.

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## What is meant by 'Regulated Activity'?

- **Regulated activity for adults:** health care, personal care, assisting with cash/paying bills or obtaining shopping, transporting/accompanying to or from places where they will receive health/personal care, social work services, counselling/psychotherapy provided by or referred by a health care professional, the activities of regulated social workers, or assistance by virtue of a Power of Attorney.
- **Regulated activity for children:** personal care including such things such as help with feeding, washing, dressing or toileting. Additionally, teaching, training, instructing, caring for, supervising, providing well-being advice and guidance, or driving a vehicle.

## What is meant by 'Frequent' or 'Intensive' activity? For the purposes of Regulated Activity:

- Frequently means - once a week or more
- Intensively means - four or more days in a 30-day period or overnight between the hours of 2am to 6am.

## What is meant by 'supervision'?

On-site, physical oversight of a team member by a leader.

## Who do I contact if I have queries about what level of DBS application an applicant requires?

The Thirtyone:eight Recruiters Guide contains flow charts and a table outlining the level of check usually required for each role. The [online eligibility tool](#) also reflects the flow charts in the Recruiters Guide but is in a more user-friendly format - if you require log in details to access the eligibility tool please email the Safeguarding and DBS Administrator. [Safer Recruitment and People Management](#) also includes information about DBS Eligibility. All these guides should be consulted in the first instance. However, if your query is not met in any of the above and you require more guidance or assistance, please contact the Safeguarding and DBS Administrator.

## Do PCC members require DBS checks?

Your PCC members may be eligible for enhanced DBS checks, but this will depend upon the activities undertaken by your church. Detailed guidance is available in [Safer Recruitment and People Management](#), specifically within Section 9 where in the 'Toolkit' section you will find further notes on PCC members eligibility. However, please do email the Safeguarding and DBS Administrator for further assistance in working this out.

## I'm a Parish DBS Evidence Checker – do I need a DBS check?

The role of Parish DBS Evidence Checker is not eligible for an enhanced DBS check. However, if the PCC wishes to undertake a Basic DBS check for a Parish DBS Evidence Checker, it can.

**Do I need to undertake any training to be a Parish DBS Evidence Checker?** Yes. You will need to undertake the Basic Awareness safeguarding course and the Safer Recruitment course. Both are available as e-learning modules and can be accessed via [Safeguarding Training](#).

## What is Section Y?

Section Y is the section in the DBS application where Evidence Checkers set the type (Enhanced) and level (workforce and/or barred list) of check required. It is important that Section Y is completely accurately to ensure the correct level of DBS check is obtained. It is also important that supporting information is added to the 'Additional Information' box to support the reason for the application and the type of check required. Section Y also includes a checkbox to determine whether an applicant is a volunteer or not. If the applicant is paid for their work, they are not a volunteer and there will be a charge for their application (please see above). If they are a volunteer but require a Basic DBS, this is also chargeable. **Please note:**

**Make sure you accurately complete the ‘Volunteer’ section. If this is incorrectly entered a charge may be applied to the check for which the parish will be liable.**

**I’m a Lead Parish DBS Evidence Checker – what does that mean?**

All Parish Evidence Checkers will have full access to the Thirtyone:eight system and be able to process DBS applications in full. However, Lead Evidence Checkers will receive an email notification every time a DBS application undertaken by an Evidence Checker using their parish code is completed. If there are multiple DBS Evidence Checkers in your parish it would be helpful to them if you would email them the notification, so they are aware.

**I’m *not* a Lead Parish Evidence Checker - what does that mean?**

The only difference between a ‘Lead’ Evidence Checker and an ‘Applicant Manager’ Evidence Checker is that the Lead Evidence Checkers will receive an email notification every time a DBS application undertaken by an Evidence Checker using the same parish code is completed.

**Are DBS checks portable?**

DBS checks undertaken by other organisations are not portable into Diocese of Exeter, even if the applicant is registered with the DBS Update Service. However, it may be possible for someone with an existing DBS application undertaken by Diocese of Exeter within the last three years to move to a different role without needing a new DBS application. Please contact the Safeguarding and DBS Administrator for guidance.

**Can we use the DBS Update Service?** Sorry, no. Diocese of Exeter does not accept DBS checks registered with the DBS Update Service although it does not deter anyone from subscribing to the Update Serve if they wish to do so. There are several reasons why the diocese does not accept DBS checks held within the Update Service, as follows:

1. The Update Service does not produce an audit trail which means the diocese cannot prove a certificate was regularly checked if an investigation of an individual were ever necessary. However, a new DBS check undertaken through Thirtyone:eight produces a retrievable record. It also collects an audit trail of all those involved in the application and of anyone who accesses the check subsequently.
2. The Update Service only updates its non-conviction information every 9 months for subscribing individuals, leaving a period of risk that the Diocese of Exeter has not been willing to accept.
3. Additionally, a diocese cannot use the DBS update service for home-based positions if there is anyone else aged 16 years and over living or working at the applicant’s home address.

## **Help and Support:**

If you are struggling to work out what level of DBS check an applicant should have, please contact the Safeguarding and DBS Administrator on 01392 294929 or by email. In the absence of the administrator, please contact Thirtyone:eight on 0303 003 1111.

If you have any technical difficulties using the online Thirtyone:Eight application system, please contact Thirtyone:Eight on 0303 003 1111 in the first instance.

For further information about the online application process please refer to the [Thirtyone:eight Recruiter and Applicant Resources](#).

For further information about Safer Recruitment please refer to [Safer Recruitment and People Management](#).

If at any point you have concerns around the safe appointment of an individual, please contact the [Diocesan Safeguarding Team](#).



## Appendix A: Invitation to be emailed to all applicants requiring a DBS check:

Dear [add name]

Thank you for your application to work/volunteer as [enter job role.]

In order to complete your online version of the DBS application form please follow the information given in the relevant User Guide (Either Basic or Enhanced – delete as applicable) available on the Thirtyone:eight website in the Recruiter Resources section: <https://thirtyoneeight.org/help-and-resources/ebulk-recruiter-resources/>

Your **Organisation Reference** is: [Please enter your organisation reference]

Your **Organisation Code** is: [Please enter your organisation code, NOT your own personal one (supplied in the main body of the E-Bulk Recruiters Acceptance email)]

Your position applied for (to be entered on the form) is: [Please enter applicants job role].

Once you have submitted your application online, you will need to produce your ID documents. As discussed with you we will be undertaking ID checking [manually or digitally – delete as applicable]. Please take a look at the list of acceptable ID documents required for your [Enhanced or Basic – delete as applicable] DBS application on the Gov.UK website: <https://www.gov.uk/government/publications/dbs-identity-checking-guidelines/id-checking-guidelines-for-standardenhanced-dbs-check-applications-from-1-july-2021>

Please note that if you have a valid passport and or photocard driving licence you must use these documents and any further documents required must be in the lists outlined in the Gov.uk guidance and provided in the original, printed versions. Printed downloads from the internet cannot be used. Additionally, if you have ever changed your name, please bring documentary evidence of these name changes in the form of birth and or marriage certificates, Deed Poll, adoption certificates, Decree Nisi etc.

Lastly, if you require an enhanced DBS check, please complete the attached Confidential Declaration form [Please attach the Confidential Declaration to the email] and return it to me prior to submitting your application. This form will be assessed before we process your disclosure application.

If you need any further assistance, please feel free to contact me.

Best wishes  
Etc.