



1. Home (<https://www.gov.uk/>)
2. DBS Update Service: employer guide (<https://www.gov.uk/government/publications/dbs-update-service-employer-guide>)

1. Disclosure &  
Barring Service (<https://www.gov.uk/government/organisations/disclosure-and-barring-service>)

Guidance

# DBS Update Service: employer guide

Updated 26 September 2018

## Contents

About the Update Service

Benefits of the service

Helping applicants to join the Update Service

Status checking

How to do a status check

Multiple status checking

Interpreting status check results

Frequency of DBS searches for new information

Why would a certificate status change?

Early confirmation checks

What should I do if an early confirmation check confirms that my employee has been barred?

Update Service and home-based positions

Update Service and manual certificates

Using the Update Service if you are an e-bulk Registered Body

Using the Update Service when recruitment decisions are made centrally not locally

Examples of how employers can legally use the Update Service

Standard level checks in the Update Service



© Crown copyright 2018

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/version/3](https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3) (<https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3>) or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk).

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at <https://www.gov.uk/government/publications/dbs-update-service-employer-guide/dbs-update-service-employer-guide>

## About the Update Service

The Update Service is an online subscription that lets employers carry out a free, instant online check to view the status of an existing standard or enhanced DBS certificate.

This can only be done if:

- the employer has the individual's consent
- the employer could legally request a new DBS check for the role that the individual is applying for
- it is for the same workforce, where the same type and level of criminal record check is required

This is because the employer is initially responsible for understanding and applying the relevant legislation to each role that they are recruiting for.

The Update Service is not currently available for basic checks.

An individual can show their certificate to anyone because it contains their information, and they can give consent to an employer to view their status on the Update Service, as mentioned above.

### Examples of how employers can legally use the Update Service

(<https://www.gov.uk/government/publications/dbs-update-service-employer-guide/dbs-update-service-employer-guide#examples-of-how-employers-can-legally-use-the-update-service>) can be found in this guide.

In some instances, employers are not registered with the DBS and must use an organisation that is registered, known as a Registered Body (RB), to submit checks on their behalf.

Where the application is submitted by an RB on behalf of the employer, the RB must understand the role that the application is for, and check that the level requested by the employer is appropriate, as they are legally responsible for submitting the application to DBS.

For an annual subscription of £13 (free to volunteers (<https://www.gov.uk/guidance/dbs-check-requests-guidance-for-employers#volunteer-applications>)) an individual can take their certificate with them from role to role (if within the same workforce, and where the same type and level of certificate is required).

The subscription must be paid by debit or credit card by the individual joining, or with another cardholder's permission.

If the applicant uses a third-party card to join and selects the annual 'auto renew' option, the DBS will attempt to take the annual renewal fee from the card used to initially subscribe.

All emails sent by the DBS will show the applicant's name.

The Update Service site is hosted on a secure system and is available in both English and Welsh.

## Benefits of the service

- instant, online checking of DBS certificates
- no more DBS application forms to fill in
- you may never need to apply for another DBS check for an employee again
- fewer administrative procedures
- saves you time and money
- enhances safeguarding processes
- easy to incorporate into existing suitability decision-making procedures

Promotional features for the Update Service include our Update Service YouTube video for employers (<https://www.youtube.com/watch?v=k2p2k2MQvRE>) and Update Service posters (<https://www.gov.uk/government/publications/dbs-update-service-posters>) that you can download.

## Helping applicants to join the Update Service

At current, an individual can join the Update Service before submitting their DBS check application, during the application process and after the issue of their DBS certificate.

As the employer, you can provide the applicant with certain information they need to join the Update Service.

Individuals can join the Update Service:

- with their application form reference number before the application is submitted or during the application process - you can provide this or they can find it in the top right-hand corner of the front page of the application form
- with the application e-reference number if you submit applications electronically

If the individual joins with their application form reference or e-reference number, the application must be received by the DBS within 28 days of the subscription being created, or the subscription will fail.

When the applicant's DBS certificate is issued we will automatically add it to their account and their subscription to the service will then be live.

Individuals can also join:

- after the DBS certificate being issued using the certificate reference number - they must do this within 30 days of the 'date of issue' displayed on the certificate

You can use our Update Service application form checklist

(<https://www.gov.uk/government/publications/dbs-update-service-application-form-checklist>) to help applicants join the Update Service. Alternatively, interested applicants can also read this guide (<https://www.gov.uk/government/publications/dbs-update-service-applicant-guide>).

## Status checking

Before you carry out a status check you will be asked to complete a legal declaration confirming that you have the individual's consent, and that you have the legal right to 'ask the exempted question'.

The declaration you need to agree with is:

I confirm I have the authority of the individual to which this DBS certificate number relates to receive up-to-date information (within the meaning of section 116a of the Police Act 1997) in relation to their criminal record DBS certificate for the purposes of asking an exempted question within the meaning of section 113A of the Police Act 1997; or in relation to their enhanced criminal record DBS certificate for the purposes of asking an exempted question for a prescribed purpose within the meaning of section 113B of the Police Act 1997.

An 'exempted question' means that you have the right to see spent conviction information which is not protected (<https://www.gov.uk/government/collections/dbs-filtering-guidance>).

A 'prescribed purpose' means that the role is listed in Police Act regulations, which give entitlement to submit an enhanced level DBS check. Some prescribed purposes can also have children and adult suitability information included.

This means that apart from spent and unspent conviction information that is not protected, enhanced certificates may also contain relevant non-conviction information which ought to be disclosed and in some cases a child or adult barred list status.

By making that declaration, you are saying that you have the right to be given that information to make a suitability assessment. You are also saying that the information is at the level you are legally entitled to request, in relation to the role that you are recruiting for.

If you access certificate information, you must comply with the DBS code of practice (<https://www.gov.uk/government/publications/dbs-code-of-practice>) and must have a policy on the recruitment of ex-offenders (<https://www.gov.uk/government/publications/dbs-sample-policy-on-the-recruitment-of-ex-offenders>).

To ensure a certificate is genuine, you can check the security features of a DBS certificate (<https://www.gov.uk/guidance/dbs-check-requests-guidance-for-employers#security-features-of-a-dbs-certificate>).

Before carrying out a status check, you must be able to answer 'yes' to the following questions. If you answer 'no' then you cannot carry out a status check:

- Have you seen the applicant's original certificate?
- Have you checked the applicant's ID to confirm their identity?
- Do you have the applicant's consent?
- Are you legally entitled to the same level of DBS certificate - standard or enhanced?
- Does the DBS certificate only contain the exact workforce that you are entitled to know about, for the role you are recruiting for?

The workforce information will be listed in the 'position applied for' section and will show which workforce has been used to determine the relevance of any locally held police information which may appear on an enhanced DBS certificate.

Where the workforce is 'other', the police will assess the relevance of locally held information in relation specifically to the position being applied for. The three workforces are child, adult and other.

Certificates may show a single workforce or a combination of child and adult, but no other combination.

If you're legally entitled to a barred list check, check that the DBS certificate only contains the one(s) you need e.g. children's list, adults' list, both. Some enhanced certificates will show that a check of the barred list has not been requested by the original organisation.

You can read more about workforces in our eligibility guidance (<https://www.gov.uk/government/collections/dbs-eligibility-guidance>).

If a person leaves your organisation, moves to a position where there is no legal entitlement to the same DBS check, or withdraws their consent, you must stop any further status checks.

If you continue to carry out status checks on their certificate, you are breaking the law by accessing data you are not entitled to see.

You should always have the individual's consent when carrying out a status check. All checks are recorded and can be viewed by the individual on their Update Service account.

## How to do a status check

After viewing the original DBS certificate, if you are legally entitled to carry out a status check and have the individual's consent, go to the Update Service (<https://secure.crbonline.gov.uk/crsc/check>), read all instructions and enter the required information:

- the name of your organisation
- your forename and surname
- the details of the DBS certificate being checked
- the DBS certificate number
- the current surname of the DBS certificate holder, as shown on their DBS certificate
- the date of birth of the DBS certificate holder, in the format DD/MM/YYYY, as shown on their DBS certificate

Please ensure there are no spaces after entering the information, then read the legal declaration and tick if you agree to it.

Status checks are free-of-charge, so you won't need to create an account.

Once you have successfully carried out a status check you will see the result of the check which you can print and then store safely and securely in line with:

- the Information Commissioner's Office employment practices code ([https://ico.org.uk/media/for-organisations/documents/1128/quick\\_guide\\_to\\_the\\_employment\\_practices\\_code.pdf](https://ico.org.uk/media/for-organisations/documents/1128/quick_guide_to_the_employment_practices_code.pdf))
- the handling of DBS certificate information policy (<https://www.gov.uk/government/publications/handling-of-dbs-certificate-information>)

## Multiple status checking

You can check the status of multiple certificates at the same time.

For more information about the multiple status checking service including how to access it, read this guide (<https://www.gov.uk/government/publications/dbs-update-service-multiple-status-checking-guide>).

## Interpreting status check results

One of the following results will be presented after a successful status check:

This DBS certificate did not reveal any information and remains current as no further information has been identified since its issue.

This means:

- the DBS certificate when issued was blank (it did not reveal any information about the person)
- no new information has been found since its issue and can therefore be accepted as being still current and valid

This DBS certificate remains current as no further information has been identified since its issue.

This means:

- the DBS certificate revealed information about the person
- no new information has been found since its issue and can therefore be accepted as being still current and valid

This DBS certificate is no longer current. Please apply for a new DBS check to get the most up-to-date information.

This means:

- new information has come to light since the DBS certificate was issued and you will need to apply for a new DBS check to see this new information

The details entered do not match those held on our system. Please check and try again.

This means either:

- the individual has not subscribed to the Update Service
- the DBS certificate has been removed from the Update Service
- you have not entered the correct information

## Frequency of DBS searches for new information

When a person adds their DBS certificate to their Update Service account, the DBS will search regularly to see if any new information has come to light since it was issued. The frequency of these searches varies depending on the level and type of DBS certificate.

For criminal conviction and barring information the DBS will search for updates on a weekly basis.

For non-conviction information, the DBS will search for updates every nine months.

We won't inform you if a status changes - you will need to carry out periodic checks of a certificate with the individual's consent.

## Why would a certificate status change?

The status will change if:

For all DBS certificates:

- new convictions, cautions, reprimands or warnings have been added to police records
- an amendment has been made by the police to current convictions, cautions, warnings or reprimands

For enhanced DBS certificates:

- as above plus any new, relevant police information

For enhanced certificates with a check against either of the barred lists:

- as above plus if the person becomes barred for either/both barred lists

If the status check reveals there has been a change, it is recommended that you have a discussion with the individual about the reason(s) as to why there has been a change.

Any action you take before you find out the new information is a matter for your organisation.

You can print and keep a copy of status checks as long as you protect the information in line with the DBS code of practice (<https://www.gov.uk/government/publications/dbs-code-of-practice>) and the General Data Protection Regulation (GDPR).

If an application for a new DBS certificate is submitted because of a status change, the organisation responsible for submitting the application (the Registered Body) will be able to request a copy of the new certificate if all the following conditions apply:

- the individual is subscribed to the Update Service
- the employer has carried out a status check which revealed a change to the DBS certificate
- the individual applied for a new DBS check
- the DBS issued the new certificate to the applicant more than 28 days ago
- the applicant has not shown the employer their new DBS certificate
- there is still a valid reason for viewing the certificate information, for example the employment role is still available

If the individual has disputed the contents of the new DBS certificate (<https://www.gov.uk/government/publications/dbs-certificate-disputes-and-fingerprint-consent-forms-and-guidance-af14-af15>), we won't issue a copy to a Registered Body until 28 days after the dispute is resolved.

This gives the applicant enough time to show the new certificate to the employer.

## Early confirmation checks

An early confirmation check will let you find out whether a status has changed because the individual has been added to a barred list.

You will need the individual's consent to request an early confirmation check.

You can only request this information if all the following conditions apply:

- the individual is subscribed to the Update Service
- a status check has indicated that the certificate is no longer up-to-date
- the certificate included a check of a barred list(s)
- you have the right to know the outcome of the barred list check
- you have the applicant's consent

You will need to complete the early confirmation check form (<https://www.gov.uk/government/publications/dbs-update-service-early-confirmation-application-form>) and email it to us. You will get a response within 7 working days.



## **What should I do if an early confirmation check confirms that my employee has been barred?**

It is illegal for an employer to knowingly allow someone to carry out regulated activity with the group from which they are barred.

It is also an offence for a barred person to work or seek to work in regulated activity, within a group from which they are barred.

If the check shows that your employee is placed in a barred list, you will be given guidance by the DBS along with the confirmation check.

There is no cost for an early confirmation check.

## **Update Service and home-based positions**

The Update Service will only check for updates relating to the individual for whom the check was carried out, not the home address where the work is being undertaken or any other individuals employed or living at that address.

If you want to find out whether there is any new information on individuals living or employed at their home, you must request a new DBS check.

You can only do this if the role you are considering the individual for, gives you the right to see the information.

You can find more information in the home-based positions guide (<https://www.gov.uk/government/publications/dbs-home-based-positions-guide>).

## **Update Service and manual certificates**

Sometimes it isn't possible for the DBS to produce a system generated/electronic DBS certificate.

When this happens, the DBS will issue a manual DBS certificate. Manual certificates can't be used to join the Update Service because the Update Service is an online facility.

## **Using the Update Service if you are an e-bulk Registered Body**

As an e-bulk Registered Body you can promote the use of the Update Service to your clients and applicants. You can also offer to run status checks for your clients if you get consent from each individual.

If you submit an individual's application for a DBS check through the e-bulk application service, the individual can join the Update Service using their e-reference or DBS certificate number.

If the individual joins the Update Service with their e-reference number, the application must be received by the DBS within 28 days of the subscription being initiated.

If an individual subscribes using their DBS certificate number, it must be done within 30 calendar

days of the 'date of issue' on the certificate.

The Update Service and e-bulk are not integrated systems. There is a separate facility which organisations can use to carry out multiple status checks. You can find more information in the Update Service multiple status checking guide (<https://www.gov.uk/government/publications/dbs-update-service-multiple-status-checking-guide>).

## **Using the Update Service when recruitment decisions are made centrally not locally**

If an individual has joined the Update Service, and you would prefer to complete an online status check instead of asking them to complete a new DBS check application, you can do so by following any of the two options:

### **Option 1**

Ask the individual to send you their original DBS certificate. If, after viewing their certificate, you still wish to consider employing them and make use of the Update Service, you need to be able to answer 'yes' to all the following questions. If you answer 'no' to any of them you cannot make a status check:

- Have you carried out ID checks to confirm their identity?
- Do you have the applicant's consent?
- Are you legally entitled to the same level of DBS certificate - standard or enhanced?
- Does the DBS certificate only contain the specific work force that you are entitled to know about for the role that you are recruiting for?

This will be listed in the 'position applied for' section and will show which workforce has been used to determine the relevance of any locally held police information which may appear on an enhanced DBS certificate. The workforces are child, adult and other.

Certificates may show a single workforce or a combination of child and adult, but no other combination.

If you're legally entitled to a barred list check, check that the DBS certificate only contains the one(s) you need e.g. children's list, adults' list, both. Some enhanced certificates will show that a check of the barred list has not been requested by the original organisation.

### **Option 2**

As the central recruitment office, you can:

- tell the local office what level of check is eligible, for the role that you are recruiting for, and ask your local office to check if the original certificate is of the same type and level of disclosure that you can request
- if it is, and there is no information on the certificate, have a process in place to let the individual know that their information will be shared with the central office so they can make an initial recruitment decision

- request that the local office carries out ID checks to confirm the individual's identity
- request that the local office obtains the applicant's consent to make a status check

You can then carry out a free, online check to make sure that the DBS certificate is still up-to-date and valid.

## **Examples of how employers can legally use the Update Service**

### **Adult workforce**

#### **Example 1:**

Amanda has an Update Service subscription with an enhanced certificate for the adult workforce. This includes a check against the adults' barred list.

Amanda has offered to work for a voluntary organisation driving adults to doctor's and hospital appointments. She presents her certificate to her potential new employer. The recruiting manager, Ranjiit, asks Amanda if he can carry out a status check on the Update Service. Amanda gives her consent.

Ranjiit knows that the levels of check on Amanda's certificate are the same level and workforce as he is allowed to request, therefore when he accesses the Update Service, he is confident that he can make the legal declaration required.

#### **Example 2:**

Roger has an Update Service subscription with an enhanced certificate in the child and adult workforce. This includes a check against the children's and adults' barred list.

Roger has been offered a post in a care home for adults. He presents his certificate to his new employer. The recruiting manager, Doris, asks Roger if she can also carry out a status check on the Update Service. Roger gives his consent.

When Doris goes on to the Update Service however, she realises that she can't do this, because she's not legally allowed to request a check of the children's barred list or see non-conviction information which relates to the child workforce.

This is because the legal declaration would ask Doris if she is entitled to check the children's list – and she's not – only the adults' list. Therefore, although Roger has given his consent, Doris cannot make the legal declaration required and cannot make an update status check.

Doris could ask Roger to complete a new DBS application form where she requests the right level and workforce for the role she will be employing him in. Roger can then add that new certificate to his Update Service subscription at no extra cost.

### **Child workforce**

#### **Example 1:**

Maria is a teacher who has an Update Service subscription with an enhanced certificate in the child workforce. This includes a check against the children's barred list. Maria offers to volunteer with her local children's playgroup.

Maria presents her certificate to Fatima, the playgroup leader. She asks Maria if she can also carry out a status check on the Update Service. Maria gives her consent, however when Fatima goes on to the Update Service, she realises that she can't do this, as she's not legally allowed to request a check of the children's barred list.

This is because she knows that Maria will be supervised by another play group leader who is in regulated activity, and that means that Maria will not be in regulated activity with children.

Fatima could only submit a new DBS application form at an enhanced level in the child workforce without a check of the children's barred list for the role that Maria will be carrying out in the playgroup. Therefore, although Maria has given her consent, Fatima cannot make the legal declaration required and cannot make an update status check.

Fatima could ask Maria to complete a new DBS application form where she requests the right level and workforce for the role she will be employing her in. Maria can then add that new certificate to her Update Service subscription at no extra cost.

#### Example 2:

Andrew has an Update Service subscription with an enhanced certificate in the children's workforce. This includes a check against the children's barred list. He applies for a teacher training course and presents his certificate to Jessica, the administrator of the course.

Andrew will be carrying out regulated activity with children as part of his placements on the course so the college could request an enhanced check in the child workforce and a check of the children's barred list.

Andrew presents his certificate to Jessica and gives her consent to carry out a status check on the Update Service. The certificate contains the same level of checks in the same workforce as the teacher training role requires therefore Jessica can make the status check as she will be able to make the legal declaration required.

### **Child and Adult workforce**

#### Example 1:

Lene has an Update Service subscription with a standard level check in the child and adult workforce because she worked as a part-time receptionist in a GP surgery. Barred list checks are not available for standard level checks. Lene then secures a place on a foundation training programme.

During her training, she will be on numerous placements in NHS trusts. These placements will involve providing regulated activity with adults and children.

She asked Jim, the administrator of the programme, if he would use her Update Service subscription to make a status check instead of requiring her to complete a new DBS application form.

Lene has given Jim consent to make the status check but Jim cannot use her certificate to assess whether she is suitable, because the assessment for enrolment includes the provision of an enhanced level check in the child and adult workforce with a check of the child and adults' barred list, as opposed to the standard level check that Lene currently has.

Jim chooses not to make a status request because it would not provide him with the information he needs so he asks Lene to complete a new DBS application form. Lene can then add that new certificate to her Update Service subscription at no extra cost

#### Example 2:

Sue has an Update Service subscription with an enhanced certificate in the child and adult workforce. This includes a check against the children's and adults' barred list. Sue had been offered a job within social services working with children and adults. She presents her certificate to her potential new employer.

The recruiting manager Alana asks Sue if she can also carry out a status check on the Update Service. Sue gives her consent. Alana knows that the levels of checks on Sue's certificate are the same level as she is allowed to request. Therefore, when she accesses the Update Service she is confident that she can make the legal declaration required.

### Other workforce

#### Example 1:

Rob has an Update Service subscription with an enhanced certificate in the other workforce. It includes a check against the children's and adults' barred lists. The original application was submitted by a local authority to make an assessment as part of a taxi licensing application process.

Rob must renew his taxi licence but has moved to a different local authority area. Rob presents his certificate to Peter - his new local authority taxi licensing officer. Peter asks Rob if he can also make a status check on the Update Service. Rob gives consent.

As the levels of check on the original certificate are the same levels of check that Peter can request for a taxi licensing application, Peter is confident that he can make the legal declaration required and can make an Update Service status check.

The only type of organisations who can make a status request in the Update Service where the certificate is an enhanced level in the other workforce with a check of child and adult barred lists are other taxi or private hire vehicle (PHV) licensing organisations.

#### Example 2:

Julia works for the Gambling Commission and has an enhanced certificate in the other work force. It does not include checks made against the children's or adults' barred lists because the role does not permit those checks to be requested.

Where the workforce is stated as 'other', Chief Officers are required to consider all information which is relevant to the position or licence being applied for.

There are a limited number of reasons why someone could have an enhanced level check in the other workforce. You can read more about this in the DBS other workforce document (<https://www.gov.uk/government/publications/dbs-workforce-guidance>).

The Gambling Commission could ask Julia to subscribe to the Update Service as they could eligibly make a status check.

Any other type of organisation would have to consider if any potential non-conviction information that may be released on Julia's certificate would be information they would legally be allowed to consider for new role, and could use in their recruitment decision.

## **Standard level checks in the Update Service**

Standard level certificates only contain information that is not protected, about spent and unspent convictions, cautions, reprimands and final warnings held on the Police National Computer (PNC).

Employers who are presented with a standard level certificate and have been given consent to make a status check in the Update Service do not have to consider the workforce on the certificate. This is because the workforce does not influence which PNC information is presented on a certificate.

So if the role is eligible for a standard level check, and that is the level of information required by the employer, any employer who can request a standard level check can make a status check because they can legally make the declaration required.