



GUIDANCE NOTES NO:

**3.7**

# **FA DISCLOSURE AND BARRING SERVICE CHECKS – FAQs**

**FOR ALL**

Version: 1.1  
Published: MAY 2019



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# FA DISCLOSURE AND BARRING SERVICE CHECKS (DBS CHECKS) – FAQs

Your CFA Designated Safeguarding Officer (DSO) and or The FA DBS Unit can assist if you have any questions as a result of using these FAQs.

## 1. WHAT IS A DISCLOSURE AND BARRING (DBS) CHECK?

The Disclosure and Barring Service Certificate which results from a DBS Check is a document containing confidential criminal history information held by the police and government departments. It can be used by employers to make safer recruitment decisions.

Disclosure information could include:

- Details of criminal records such as convictions and cautions;
- Information about a person's inclusion on children's or adults' barred lists<sup>1</sup>;
- Other relevant information held by a local police force or government body;
- Or state that there is no information.

The information included in the document will depend on the type of disclosure applied for. The majority of checks in football are undertaken on those who work with vulnerable groups, such as children or adults at risk.

An 'Enhanced DBS Check' contains all conviction information, spent and unspent, and any other non-conviction information considered to be relevant by the police or other government bodies. For more detailed information about Enhanced DBS Checks please visit [www.gov.uk](http://www.gov.uk) and search for 'Disclosure and Barring Checks'.

<sup>1</sup>'Barred lists' refer' to a list of people barred from working with children (replacing List 99, the POCA list and disqualification orders) and a list of people barred from working with adults (replacing the POVA list).

## 2. WHAT IS THE QUICKEST WAY TO GET A DBS CHECK?

Through the online application process run by The FA DBS Unit. Feedback from users of the service is extremely positive. For more information about the process, e-mail [FAchecks@TheFA.com](mailto:FAchecks@TheFA.com) or see **question 5 below**.

## 3. WHY DO PEOPLE IN FOOTBALL NEED TO HAVE A DBS CHECK?

Not everyone in football needs one. See **question 4 below**.

The law requires that The FA does all that it can to prevent people who are barred from working with children in Regulated Activity, from becoming involved in football with U18s. An 'Enhanced DBS Check with Children's Barred List' tells The FA if a person is barred. The FA also uses Enhanced DBS Checks for roles that are eligible.

These checks help The FA make informed recruitment decisions about the suitability of people with criminal records who are seeking a role in under-18s' football.

<sup>1</sup>'Barred lists' refer' to a list of people barred from working with children (replacing List 99, the POCA list and disqualification orders) and a list of people barred from working with adults (replacing the POVA list).



## 4. DO I NEED AN ENHANCED DBS CHECK?

There are two clearly-defined workforces that will require checks:

- Those working in the child workforce in roles with under-18s in youth and/or open-age football;
- Those working with 'adults at potential risk of harm' within the adults' workforce<sup>2</sup>.

Those who are working or volunteering directly with children and young people in football need to have an Enhanced DBS Check.

The Protection of Freedoms Act, 2012, identified 'regulated activity' as specific activities, carried out frequently or intensively, which is unsupervised.

This includes those whose roles involve teaching, training, instructing, supervising, giving advice or guidance on well-being, caring for children or driving a vehicle solely for children on behalf of a club or football organisation.

'Frequently' or 'intensively' are usually described as once a week or more, four days or more in one 30-day period, or overnight. Although occasionally people with lower levels of contact may still need a check.

Those who carry out these roles with children frequently and are unsupervised will need an Enhanced DBS Check with Children's Barred List.

Supervision is defined by the legislation as:

- Regular;
- Day to Day;
- Reasonable in all circumstances for protecting children; and
- Carried out by someone in 'regulated activity'.

In making its decisions on which roles are supervised and which are not, The FA has utilised the Government guidance, alongside the sport sector guidance on supervision. This was developed by the Sport and Recreation Alliance and the Child Protection in Sport Unit.

The FA has invested considerable time consulting with stakeholders to define which roles in football are unsupervised. As a result, the following roles in under-18s' football should have an Enhanced DBS Check with Children's Barred List:

- Those in designated safeguarding/welfare officer roles e.g. Club Welfare Officers;
- Team Managers, Coaches and Assistants. This includes managers and coaches who are referred to as Assistant Managers or Coaches);
- Tutors, Mentors, Assessors, Sport Scientists;
- Referees, Referee Mentors, Referee Coaches and Observers in under-18 football;
- Professional club Heads of Recruitment, Recruitment Officers [also referred to as Scouts], Agents, Chaperones, Landladies/Landlords, House Masters, and Host Families;
- First-Aiders, Doctors, Physios and other health and care professionals, as defined by the Health Care Professional Council (HCPC) registered roles;
- Chaplains;
- Regular club drivers.

Ordinarily, Club Chairmen, Treasurers and Secretaries do not require a check, if they are only or mainly administrative roles. However, if the people in these roles also help with coaching or at matches, then they will need an Enhanced DBS Check with Children's Barred List in their role as a coach, team assistant, etc.

Lots of roles do not need to have checks. For example: you do not need to have a check to:

- Watch your child play;
- If you occasionally run the line;
- If you drive your own child and his/her friends to games, if this is a private and personal arrangement with other parents;
- If your role is mainly administrative;
- If you play alongside 16/17-year-olds in adult football.

If you have been asked to have a check and you don't think you need one, please ring The FA DBS Unit on **0845 210 8080** or e-mail [FAChecks@TheFA.com](mailto:FAChecks@TheFA.com) for advice.

If you have been asked to check certain individuals and are not sure if they need a check, then please speak to your County FA Designated Safeguarding Officer or e-mail [FAChecks@TheFA.com](mailto:FAChecks@TheFA.com) for advice.

It is very important that people who do not need a check are not required to have one, as this is breaking the law and has serious consequences.

<sup>2</sup> Further guidance in relation to DBS Checks will be provided for those working within the adults' workforce.

## 5. HOW DO I GET AN FA ENHANCED DBS CHECK?

You may have more than one role in football, but you only need one Enhanced DBS Check to cover all your roles in football. Choose the role in which you have the most frequent contact with under-18s from the table below.

YOUR ROLE IN FOOTBALL	ACTION TO TAKE
Grassroots under-18s coach, manager, first-aider or other club-based eligible role	Speak to your Club Welfare Officer
Club Welfare Officer, Youth League Welfare Officer	Speak to your County FA Designated Safeguarding Officer
Referee, referee mentor, referee coach, referee observer and referee tutor in U18 football	Contact your County FA Referee Development Officer
FA Licensed Coach applicant	Ring <b>0845 210 8080</b> or e-mail <a href="mailto:FAChecks@TheFA.com">FAChecks@TheFA.com</a> for advice
Working in a private soccer school or unaffiliated football	You may not be able to get an FA Enhanced DBS Check. Please speak to your line manager or contact <b>0845 210 8080</b> or e-mail <a href="mailto:FAChecks@TheFA.com">FAChecks@TheFA.com</a> for advice
Working at a Premier League club	Contact the Children's Services Officer at your club
Working an English Football League (EFL) club	Contact the Designated Safeguarding Officer or contact <b>0845 210 8080</b> or e-mail <a href="mailto:FAChecks@TheFA.com">FAChecks@TheFA.com</a> for advice
Unsure what you should be doing?	Ring <b>0845 210 8080</b> or e-mail <a href="mailto:FAChecks@TheFA.com">FAChecks@TheFA.com</a> for advice

## 6. WHAT IS THE MINIMUM AGE FOR AN FA ENHANCED DBS CHECK?

The legal minimum age is 16 years of age and FA Policy requires DBS Checks for everyone in an eligible role, who is 16 years or older, to undertake a check.

## 7. HOW MUCH DOES IT COST?

This depends on whether or not you are a volunteer and what application method you use.

The Home Office is very strict in its definition of volunteers. It defines a volunteer as:

"Any person engaged in an activity which involves spending time, unpaid (except for travel and other approved out of pocket expenses), which aims to benefit some third party other than or in addition to a close relative".

The applicant must not benefit directly from the position the DBS Check application is being submitted for. The applicant must not:

- Receive any payment (except for travel and other approved out-of-pocket expenses);
- Be on a work placement;
- Be on a course that requires them to do this job role;
- Be in a trainee position that will lead to a full time role/qualification.

YOU ARE	ADMINISTRATION FEE ONLINE APPLICATION METHOD	GOVERNMENT CHARGE	TOTAL
A Volunteer	£10	Nil	£20 or £10 depending on application method
Not a Volunteer	£10	£44	£64 or £54 depending on application method

If you are unsure whether or not you are a volunteer you must contact us on 0845 210 8080 for advice. Making a dishonest application may have serious consequences.

Remember, cheaper, quicker applications can be made online. There is an easy to follow e-guide which describes step-by-step, how to use this online application process.

Your club can either speak with their County FA Designated Safeguarding Officer, email [FAChecks@TheFA.com](mailto:FAChecks@TheFA.com) or ring 0845 210 8080 for information.

## 8. WHY DOESN'T THE FA PAY FOR MY DBS CHECK?

The FA has already made, and continues to make, significant investments to help make children's football fun and safe. Investment is made in its education programmes, case management services and all the other support services available for clubs, leagues and individuals.

## 9. I HAVE HAD A DBS CHECK FOR MY WORK, SPORT OR VOLUNTARY ROLE. DO I NEED ANOTHER ONE?

The Government introduced the potential for portable checks via the DBS Update Service, which was launched in 2013.

To make a DBS Check 'portable' you need to subscribe to the Update Service at [gov.uk/db-update-service](https://gov.uk/db-update-service)

Checks undertaken through The FA should cover you to work in affiliated football including the EFL (English Football League). If you are in a Premier League Club your check may cover you for Football League or FA activities. Contact your Children's Services Officer for advice.

## 10. HOW LONG DOES IT TAKE TO GET AN FA ENHANCED DBS CHECK?

Online applications take seven days to be processed.

You can check the progress of your application online via the DBS website. To do this you need to keep the Form Reference Number from your paper Disclosure Application Form. This begins with an 'F' and has 10 digits. [Click here to track progress.](#)

If you are using the online application process you can track progress using the E-Application number emailed to you as part of the process. [Click here to track progress.](#)

## 11. WHY DO SOME CHECKS TAKE LONGER THAN OTHERS?

Delays may be due to a number of reasons:

- Complex address history;
- Common name;
- Delays in the local Police forces and in accessing local records;
- Incomplete forms being submitted.

Club Welfare Officers should use the Online Safeguarding Service accessed via The FA's online Whole Game portal to ensure the application progresses to an 'Accepted' status. People should be under supervision until their DBS Check shows as 'Accepted'. No-one should be allowed to work unsupervised with children, without having undertaken a check and been accepted, or whilst their check is in progress.

Best practice means people should wherever possible help or work in pairs or groups. This provides safeguards for everyone.

## 12. WHY ARE SOME PEOPLE ASKED FOR FINGERPRINTS?

In some cases the DBS and Police cannot confidently match the person against a record. Some names are more common than others and there may be two or more records with the same name and date of birth. The Police need to use another 'identifier' and fingerprints are an effective way of ensuring the correct record is identified and released. This is not at all unusual and is nothing to worry about.

If you have been asked for fingerprints and you want to find out more, please e-mail: [FAChecks@TheFA.com](mailto:FAChecks@TheFA.com) or ring 0845 210 8080 for advice and assistance.

## 13. WHAT IF THERE IS SOMETHING ON THE DBS CERTIFICATE?

The FA is very fair and it does have a duty to make sure the information released does not affect the safety of children. Every Disclosure is assessed individually taking into account the person's age at the time of the incident; the time expired since the conviction, the way the court dealt with the crime and other relevant information.

Old offences are not viewed as seriously as recent offences. Minor and financial crimes are usually not as relevant. Juvenile offending is generally less concerning than adult offending. The DBS is also undertaking a process to filter old and minor convictions and cautions.

Recent assaults, violence with prison sentences, sexual crimes and drug supply are some of the concerns that are considered as a higher risk.

The FA will sometimes contact you about convictions or information on your DBS Certificate and ask you to provide two character references. This is to reassure The FA you are now suitable to be involved in children's football and that your convictions, or other information are not relevant to the welfare of under-18s in football. If you are asked for this information it is very important you provide it quickly. The FA may suspend people who do not reply to these requests for information.

The final decision will be made by an independent Panel of people including individuals with relevant professional expertise and understanding of football who are fair and careful in their decision making.

Occasionally The FA may make a decision that a person should be suspended while these enquiries are carried out. If this happens you will be given clear information about what you may and may not do in football and how to progress your situation.

When the enquiry process is complete and The FA is satisfied, the Disclosure will be treated as if it were clear of convictions. This means The FA Online Safeguarding Service will be updated to show you as 'Accepted' in football and your Disclosure will be shredded in accordance with the law. You will receive a letter telling you when this happens.

To speak to someone in confidence about your history or to ask more about this process please call The FA DBS Unit enquiry line on **0845 210 8080** or e-mail [FAChecks@TheFA.com](mailto:FAChecks@TheFA.com) with your query.

To find out more about the requirements on The FA to use Disclosures fairly, see The FA's Policy Statement on **Recruiting Ex-Offenders: Guidance notes 3.8** at [TheFA.com/governance/safeguarding](https://www.thefa.com/governance/safeguarding) or visit [www.gov.uk](http://www.gov.uk) and follow the links to 'Employing People' and then 'Recruiting and Hiring'. This website can also put you in touch with organisations that support ex-offenders.

## 14. WHAT POLICE NATIONAL COMPUTER (PNC) INFORMATION WILL BE FILTERED FROM INCLUSION ON A DBS CERTIFICATE?

For more information visit: [gov.uk/government/publications/dbs-filtering-guidance/dbs-filtering-guide](https://www.gov.uk/government/publications/dbs-filtering-guidance/dbs-filtering-guide)

## 16. WHAT IF THE INFORMATION ON DBS CHECK IS WRONG?

You need to tell the DBS immediately. The DBS refer to this process as a 'Dispute'. If you wait more than 90 days information cannot be changed.

It is very important to tell the DBS as you might find the wrong information affects your ability to have a role in under-18s football or to get a job elsewhere.

Information about how to contact the DBS will be on the back of your Disclosure.

To start the process you can ring **0870 9090 811** or visit [www.gov.uk](http://www.gov.uk) and follow the links to 'Employing People' and then 'Recruiting and Hiring'.

Sometimes The FA DBS Unit disputes a Disclosure because the postcode is wrong or a name has been printed incorrectly by the Home Office. This may result in a second Disclosure being issued to you with the correct information. If this happens you are advised to destroy the first one.

## 17. WHO WILL SEE MY DISCLOSURE?

As of June 2013 only The FA may request to see your original Disclosure to update its records. Please comply swiftly when this happens.

You should not be asked by your Club Welfare Officer or anyone else in your club to show your check. The Club can access the details they need by using the Whole Game System portal to check the Online Safeguarding Service. You do not need to show your check to anyone outside of The FA's recruitment process.

The FA may however, ask you to share your copy with the County FA Designated Safeguarding Officer, or in the EFL (English Football League), the Designated Safeguarding Officer as they may be directly involved with assessing your suitability to be involved in under-18s' football.

If there is no relevant criminal history a record will be kept stating that you have completed the DBS Check process and there is currently no known reason why you should not be accepted into football. Club Welfare Officers and County FAs can use

the Whole Game System portal to check the Online Safeguarding Service and see your Disclosure has been 'Accepted' by The FA. This system can also show the club your Safeguarding Children training record.

If there is a criminal history, a set process will be followed. For more about this see **question 13 above**: 'What if there is something on The FA DBS Check?'

If you are suspended, your club and County FA will be told of the suspension.

## 18. WHAT HAPPENS IF I CHANGE CLUBS OR REGISTER WITH A NEW COUNTY FA?

Speak to the Club Welfare Officer at your new club. They can access The FA's Online Safeguarding Service via Member Services to ensure that your Disclosure has been accepted. You will need to provide evidence of your identity, but not your Disclosure certificate. You do not need to show your Disclosure to anyone outside of The FA's recruitment process.

Clubs may ask you to have a new check especially if your previous one is over three years old. This is nothing to worry about and is simply FA Policy.

If you move County FAs (e.g. as a referee), your new County FA can access your previous records. However, depending on when your check was done, they may require you to complete an updated one.



## 19. WILL I NEED TO RENEW MY DBS CHECK?

Given that a DBS Check is a snapshot in time and therefore potentially only accurate at the time it was printed, it is FA Policy to require checks to be renewed every three years.

All checks must be 'in-date' by three years at the point of affiliation and/or registration, and/or licensing.

The FA's Policy requires that rechecks of the status of those who have subscribed to the DBS 'Update Service' will be undertaken every 12 months.

## 20. WHERE CAN I GET MORE INFORMATION?

For more about the DBS Check process visit [www.gov.uk](http://www.gov.uk) and follow the links to 'Employing People' and then 'Recruiting and Hiring'. This website also carries information about organisations that support ex-offenders.

## 21. HOW DO I MAKE A COMPLAINT?

To make a complaint about any aspect of The FA DBS process please contact The FA DBS Unit by emailing [FAChecks@TheFA.com](mailto:FAChecks@TheFA.com) or calling **0845 210 8080**. Alternatively, write to:

Complaints  
The FA DBS Unit  
1 Wilford Business Park  
Ruddington Lane  
Nottingham NG11 7EP

The FA DBS Unit will direct your complaint to the appropriate person.





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