



GUIDANCE NOTES NO:

3.7

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

FOR ALL

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FA DISCLOSURE AND BARRING SERVICE CHECKS (DBS CHECKS) □ FAQs

These FAQs refer to checks for people in football working or volunteering with children (a child is a person under the age of 18).

*Your County FA Designated Safeguarding Officer (DSO) and or The FA DBS Unit (e-mail: FAChecks@TheFA.com, tel: **0115 969 4618**), can assist if you have any further questions.*



FA DISCLOSURE AND BARRING SERVICE CHECKS (DBS CHECKS) □ 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 lists¹;
- Other relevant information held by a local police force or government body;
- A statement that there is no information held about an individual.

The information included will depend on the type of disclosure applied for. Most checks in football are undertaken on those who work with children. 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 and search

for 'Disclosure and Barring Checks'. '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.

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

Through the online application process run by The FA DBS Unit. For more information about the process, e-mail FAchecks@TheFA.com or see question 5.

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

Not everyone in football needs one. See question 4. 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 under-18s. An 'Enhanced DBS Check with Children's Barred List' tells The FA if a person is barred. The FA 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 football working or volunteering with under-18s¹.



¹ 'Barred lists' refers 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. WHO NEEDS AN ENHANCED DBS CHECK?

Those working in the child workforce in roles with under-18s in youth and/or open-age adult football. The Protection of Freedoms Act, 2012, identified 'regulated activity' as specific activities with children, carried out frequently or intensively, which are 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 means at any time on more than three days in any period of 30 days, or any time between 2am and 6am with the opportunity for face-to-face contact with children. 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 a check of the 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 working with under-18s in football should have an Enhanced DBS Check with Children's Barred List:

- Those in designated safeguarding officer roles e.g. Club Welfare Officers, including club Welfare officers in open-age adult teams where there are 16/17-year-olds;
- 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 in under-18 football;
- Referee Mentors, Referee Coaches and Observers working with under-18s;
- 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 **0115 969 4618** or e-mail 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 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.

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.

YOUR ROLE IN FOOTBALL	LEVEL/TYPE OF FOOTBALL	ACTION TO TAKE
Under-18s coach, Manager, Assistant Coach/Manager, First aider, Physio, Doctor or other club-based eligible role.	Grassroots Youth Football	Speak to your Club Welfare Officer (Youth Teams)
Coach, Manager, Assistant Coach/Manager, First aider, Physio, Doctor in teams with 16/17-year-old players.	Grassroots Open-Age Adult non-disabled and disability football with 16/17-year-old players.	If your club has youth teams as well as adult teams your current CWO (Youth Teams) could manage your checks. Otherwise contact your CFA to find out how to progress DBS Checks or contact The FA DBS Unit via Tel: 0115 969 4618 or email FAchecks@TheFA.com
Club Welfare Officer (Youth Teams), Youth League Welfare Officer	Grassroots Youth Football	Speak to your County FA Designated Safeguarding Officer
Club Welfare Officer (Adult Teams)	Grassroots Open-Age Adult Football with 16/17-year-old players	If your club has youth teams as well as adult teams your current CWO (Youth Teams) could manage your checks. Otherwise contact your CFA to find out how to progress DBS Checks or contact The FA DBS Unit via Tel: 0115 969 4618 or email FAchecks@TheFA.com
Club Welfare Officer (Adult Disability Teams) with 16/17-year-old players	Grassroots Open-Age Adult Disability Football	If your club has youth teams as well as adult teams your current CWO (Youth Teams) could manage your checks. Otherwise contact your CFA to find out how to progress DBS Checks or contact The FA DBS Unit via Tel: 0115 969 4618 or email FAchecks@TheFA.com
Referee	Youth Football	Contact your County FA Referee Development Officer
Referee Mentor, Referee Coach, Referee Observer	All	Contact your County FA Referee Development Officer
FA Licensed Coach applicant	All	Ring 0115 969 4618 or e-mail FAchecks@TheFA.com for advice
All roles	Premier League clubs	Contact the Children's Services Officer at your club
All roles	English Football League (EFL) clubs	Contact the club Designated Safeguarding Officer or The FA DBS Unit via Tel: 0115 969 4618 or e-mail: FAchecks@TheFA.com
Working in a private soccer school or unaffiliated football	All	You may not be able to get an FA Enhanced DBS Check. Please speak to your line manager or contact 0115 969 4618 or e-mail FAchecks@TheFA.com for advice
If you are still unsure what you should be doing?		Contact The FA DBS Unit on Tel: 0115 969 4618 or e-mail: FAchecks@TheFA.com 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 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.

If you are unsure whether you are a volunteer, you must contact The FA DBS Unit on **0115 969 4618** for advice. Making a dishonest application may have serious consequences.

Most applications are made online and it is quick and cheaper to apply this way. 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 or call: **0115 969 4618** 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 ALREADY HAVE A DBS CHECK (FROM ELSEWHERE), CAN I USE THIS?

To make a DBS Check 'portable' you need to subscribe to the Update Service. The DBS Update Service is an online subscription service that lets you keep your DBS certificate up-to-date. It also allows employers to check a certificate online, with your consent. The service costs £13 per year and starts from the date your DBS certificate was issued. You can find out more via gov.uk/dbs-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 several reasons:

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

Club Welfare Officers should check on The FA's online Whole Game System portal safeguarding page 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 or ring **0115 969 4618** for advice and assistance.

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

The FA is 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 working or volunteering with under-18s in 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 decide 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's online Whole Game System portal safeguarding page 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 **0115 969 4618** or e-mail 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 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/dbsfiltering-guidance/dbs-filtering-guide

15. 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 working or volunteering with under-18s in 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 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.

16. WHO WILL SEE MY DISCLOSURE?

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 FA's online Whole Game System portal safeguarding page. 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 working or volunteering with under-18s in 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 (Youth and Adult Disability Teams), Club Secretaries/Assistant Secretaries, EFL Designated Safeguarding Officers and County FAs can use The FA's online Whole Game System portal safeguarding page to see if 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: '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.

17. 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 The FA's online Whole Game System portal safeguarding page 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 coach), 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.

18. WILL I NEED TO RENEW MY DBS CHECK?

Yes, 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.

19. HOW DO I BECOME A VERIFIER FOR MY CLUB?

Your County FA will be able to advise you or contact The FA DBS Unit via FAchecks@TheFA.com or Tel: **0115 969 4618**

20. WHERE CAN I GET MORE INFORMATION?

For more about the DBS Check process visit 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 or calling **0115 969 4618**.

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.



OPEN-AGE ADULT FOOTBALL DBS CHECK FAQs

RELATING SPECIFICALLY TO PEOPLE WORKING WITH 16/17-YEAR-OLDS

Please note this applies to disability and non-disability Open-Age Adult Football

22. AS WELL AS COACHING AN OPEN-AGE ADULT TEAM I ALSO COACH A YOUTH TEAM. DO I NEED ANOTHER FA DBS CHECK?

No, you can use your accepted Enhanced FA DBS Check for your role in Open-Age Adult Football (which can include 16/17-year-old players) as well as youth football if it is in-date (within the last three years).

23. WE ONLY HAVE ONE UNDER-18 PLAYER IN OUR OPEN-AGE ADULT TEAM, DOES THE COACH STILL NEED A DBS CHECK?

Yes, the coach has a responsibility for the player and must therefore have an accepted in-date FA Enhanced DBS Check.

24. 16/17-YEAR-OLD PLAYERS HAVE REGISTERED WITH OUR TEAM, CHANCES ARE THEY WON'T GET TO PLAY MATCHES; DOES THE COACH STILL NEED A DBS CHECK?

Yes, if you have 16/17-year-old players registered with your team and they are eligible to take part in club training sessions, social activities and matches. Therefore, you have a responsibility for them and must have a coach with an accepted in-date Enhanced FA DBS Check.

25. I'M AN ASSISTANT COACH FOR OUR OPEN-AGE ADULT TEAM. THE COACH HAS AN FA DBS CHECK, DO I STILL NEED TO HAVE ONE?

Yes, all coaches/managers and assistant coaches/managers must have an accepted in-date Enhanced FA DBS Check.

26. MY OPEN-AGE ADULT TEAM HAS 16/17-YEAR-OLD PLAYERS, DO WE NEED TO DBS CHECK OUR ADULT PLAYERS?

No, they do not have a regulated role as such there is no eligibility to check them – the law is clear you cannot check individuals just because they are a player.

27. CAN WE DBS CHECK ALL OF OUR COMMITTEE MEMBERS?

No, not in their capacity as committee members as this is not a 'regulated' role and therefore there is no eligibility to check them. If a committee member has another role that is 'regulated' e.g. CWO (Adult Teams) or physio they must complete an Enhanced FA DBS Check for that 'regulated' role.

28. DOES OUR PHYSIO/ DOCTOR/FIRST AIDER NEED A DBS CHECK?

Yes, individuals require a check where their primary role with the club is that of a First Aider with teams that include 16/17-year-old players. If the club has a physio and/or doctor they must also have an accepted in-date Enhanced FA DBS Check.

29. I'M THE CWO (ADULT TEAMS). HOW DO I GET MY DBS CHECK DONE?

If your club has youth teams as well as adult teams your current CWO (Youth Teams) could manage your checks. Otherwise either contact your CFA to find out how to progress your DBS Check or contact The FA DBS Unit via Tel: **0115 969 4618** or email FAchecks@TheFA.com

30. I'M THE CWO (ADULT DISABILITY TEAMS). HOW DO I GET MY DBS CHECK DONE?

If your club has youth teams as well as adult teams your current CWO (Youth Teams) could manage your checks. Otherwise either contact your CFA to find out how to progress DBS or contact The FA DBS Unit via Tel: **0115 969 4618** or email FAchecks@TheFA.com

31. HOW DOES THE CLUB FIND OUT IF SOMEONE IS SUITABLE TO WORK WITH CHILDREN ONCE THE DBS CHECK IS COMPLETED?

Your Club Secretary, Assistant Secretary, and/or Club Welfare Officer (where appointed) can access the DBS status of coaches, managers and medics via The FA's Whole Game System (WGS), Club/Team Official's pages. For details and support on how to access this information within WGS please contact your local County FA.

32. I ONLY REFEREE ADULT FOOTBALL DO I NEED A DBS CHECK?

No. However, if you choose to officiate youth football in future you must undertake an FA DBS Check for this.





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