



GUIDANCE NOTES NO:

**3.2**

# THE FA DBS CHECKS

**FOR CLUBS AND LEAGUES**

Version: 1.1  
Published: MAY 2024



**FOR ALL**

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# 1. SAFER RECRUITMENT OF VOLUNTEERS

**The FA is firmly committed to creating a safe and inclusive environment for children to enjoy playing football.**

Safeguarding children is about putting in place the best possible practices and procedures. This will protect not only children but also the club/league and the adults helping out with under-18s in football.

**DBS Checks are only one part of a broader, safer recruitment process.**

When clubs or leagues recruit new members all reasonable steps must be taken to ensure unsuitable people are prevented from working with children and young people both in open-age teams (who have players aged under 18) and youth football. All organisations working with children have safeguarding responsibilities and clear requirements placed upon them by legislation, including DBS checks for those in regulated activity ([see Section 13: FAQs](#)).

As part of Safer Recruitment clubs should take the following measures:

- Clearly identify the role you are recruiting for, including the lower age limit
- Identify the skills and knowledge required for the role
- Interview volunteers – explore why they are interested in the role and why they want to be involved in football
- Collect references from a suitable organisation such as an employer, community organisation or sports club
- Ask to see certificates and evidence of qualifications
- Supervised Trial Session – this is particularly relevant for coaches and will enable you to see how they engage with children, young people, parents and other club members
- Discuss with the individual any gaps in their skills and knowledge and what training may be appropriate to address these
- Support the individual on an ongoing basis, including 1:1 check-ins, observations, recognising achievements and training needs.



All grassroots clubs and leagues should follow the **eight steps** set out in [The FA's Guidance 3.1: Safer recruitment of volunteers in grassroots football](#) to ensure fair and safer recruitment across the game. If you require further support or guidance contact your County FA Designated Safeguarding Officer.

## 2. WHO NEEDS A DBS CHECK?

Eligibility (*see section 15: Key words and phrases*) for a DBS Check in football is governed by legislation. In brief this means a DBS Check is required for anyone aged 16 years or over who undertakes any potentially unsupervised activity working directly with children and young adults under the age of 18.

These activities include:

- Football Coach/Assistant Coach (includes open-age football with 16/17-year-old players).
- Football Team Manager/Assistant Manager working with under-18 players (includes open-age football with 16/17-year-old players).
- Club Welfare Officer/Assistant Club Welfare Officer (includes open-age football with 16/17-year-old players).
- Chaperone for under-18s.
- Regular club driver only for children (not private arrangement between parents).
- Host family.
- First-aider/medic (working with under-18s).
- Referee (youth football only).

If in doubt refer to The FA's Guidance Notes **3.3: Eligibility of Roles**

Anyone undertaking these activities **MUST** obtain a DBS Enhanced Criminal Records Disclosure with Children's Barred List Check.



# 3. CLUB REGISTRATION FOR THE ONLINE DBS SERVICE AND INFORMATION FOR CWO/DSO/RDOS

## 1. Club registration for the online DBS service.

STEP	WHAT TO DO
1	Email <a href="mailto:FAverifiers@FADV.com">FAverifiers@FADV.com</a> requesting club registration Include: 1. Club name 2. CWO name 3. Your FAN (FA Number)  Alternatively, go to the FADV microsite <a href="#">here</a> where the registration form is hosted.
2	Complete the Registration Form emailed to you and forward to <a href="mailto:FAverifiers@FADV.com">FAverifiers@FADV.com</a>
3	The FA DBS team will add your club to the online system
4	You will receive an email with two attachments: 1. FA DBS Online Club Guidance 2. FA DBS Online Applicant Guidance
5	Once the setup is complete you will receive a second email: 1. Confirming your status as a club DBS verifier 2. Organisation Pin (unique to each club) 3. Username (your email address) 4. Link to the Online Disclosures application portal
6	Follow the link and create a <b>password</b> which will be required for all future online access

2. Ensure you always forward a copy of the FA DBS Check Online Applicant Guidance to each DBS Check applicant. It contains important information regarding The FA's responsibilities as well as the unique club login details.
3. As part of the Application process you will need to check and verify each Applicants Identity Documents (ID). This is a straightforward process with step-by-step instructions online.
4. Tracking who has completed DBS Checks and safeguarding training.

The FA's **Club Portal** enables Club Welfare Officers (CWOs), assistant CWOs and Club Secretaries to track and manage club members who are required to undergo a DBS Check and complete safeguarding training.

**Club Portal** details who in your club has an FA Accepted DBS Disclosure along with the Disclosure issue and expiry dates. For more information on the Club Portal click [here](#).

Club Welfare Officers can additionally view the progress of applications within the DBS process using the FA DBS online service Online Disclosures [here](#).

# 4. DBS CHECK INFORMATION FOR APPLICANTS

Applying for a DBS check is a three-step process:

1. Online registration and completion of applicant details
2. Face-to-face ID verification
3. Online payment by credit/debit card via PayPal (normally by the applicant or club, you will be advised by your ID verifier if there is a different payment arrangement)

ROLE IN FOOTBALL	ACTION TO TAKE TO START THE PROCESS	ID VERIFIER
Grassroots Coach/ Manager (incl. Assistants) First-Aider or other club-based eligible role	Contact your Club Welfare Officer (CWO)	Club/League verifier usually CWO or YLWO
Club Welfare Officer	Contact your CFA Designated Safeguarding Officer (DSO)	CFA DSO
Referee, Referee Mentor, Referee Coach, Referee Assessor and Referee Tutor in under-18 football	Contact your CFA Referee Development Officer (RDO)	CFA RDO, DSO or League verifier
Working in a private soccer school or unaffiliated football	You may not be able to get an FA Enhanced DBS Check, speak to your line manager	
Working in Premier League Club	Contact the Designated Safeguarding Lead at your club	Head of Safeguarding or HR
Working in English Football League, BWSL and BWC or Club Community Organisation	Contact the Designated Safeguarding Lead at your club or 0115 969 4618 or FAChecks@TheFA.com	Safeguarding Manager or HR
NLS (1-4) Coach/Manager, FA WNL Coach/Manager (incl. Assistants) First-Aider or other club-based eligible role	Contact your Club Welfare Officer (CWO)	Club verifier, usually CWO or CFA DSO

View list of County FA contacts [here](#).

If you do not receive your Disclosure within 60 days contact the Disclosure and Barring Service [www.gov.uk/guidance/tract-a-dbs-application](http://www.gov.uk/guidance/tract-a-dbs-application). Please note, at this point in time only the Applicant can use this service.



## 5. DBS CHECK COST

Current cost of an FA DBS Enhanced Criminal Records Disclosure with Children's Barred List Check.

YOU ARE	ADMIN FEE	GOVERNMENT CHARGE	TOTAL
Volunteer	£10	Nil	£10
Not a volunteer	£10	£38	£48

The government defines a volunteer as:  
A person engaged in an activity which involves spending time, unpaid (except for travel and other approved out-of-pocket expenses), doing something which aims to benefit some third party other than, or in addition to, a close relative.

[DBS check application process for volunteers - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

## 6. WHAT HAPPENS IF MY DISCLOSURE SHOWS WARNING, REPRIMANDS, CAUTIONS OR CONVICTIONS?

All convictions, cautions and information on the DBS Disclosure are assessed for their relevance to safeguarding children. This assessment is carried out by a specialist FA Safeguarding team. If you have content on your DBS Disclosure you may be asked to provide further information as part of this assessment.

The existence of any convictions and/or cautions will not necessarily prevent an individual from being involved in football, that will depend on the nature and circumstance of the information provided and will be reviewed on a case-by-case basis.

DBS certificates containing content will only be seen by the FA Safeguarding Team. It will not be shared more widely unless there is a need to share information with others in order to protect children.

Volunteers and others in football should be assured that The FA will take into account the Rehabilitation of Offenders Act (ROA) 1974 and only consider offences which we are entitled to in relation to the ROS Exceptions Order 1975.

For more information please see [The FA Guidance 3.4 Recruitment of ex-offenders](#)



## 7. DBS CHECKS WHEN CHANGING ROLES OR CLUBS

If you already have an in-date *FA Accepted DBS Check* you do not need another one for your new role within grassroots football.

Also, if you have a DBS Check from outside football which you wish to bring into football, you may not need a new one, provided it meets the portability criteria:

1. It has been registered for the DBS Update Service and
2. It is a DBS Enhanced Criminal Records Disclosure with Children's Barred List Check.

There is a one-off charge of £10 for 'porting' a DBS Check from outside football into The FA which includes an ID verification process. Note, the Disclosure and Barring Service charges Applicants £13/year for use of the Update Service. For most volunteers it is quicker and cheaper to apply for a new FA DBS Check. For more information, see Section 12 (Using the DBS Update Service) on [page 11](#).



## 8. HOW LONG DOES AN FA DBS LAST?

Three years. A DBS Disclosure is a snapshot in time and therefore needs to be renewed regularly. To be in-date means an FA DBS Check must have been completed within the last three years and be valid for the current season.



## 9. DBS CHECKS FOR OPEN-AGED FOOTBALL

If you have under-18s playing in open-aged football, Coaches, Managers (including Assistants) and CWOs **MUST** obtain a DBS Enhanced Criminal Records Disclosure with Children's Barred List Check. For more information contact your local County FA.

## 10. DBS FOR PROFESSIONAL FOOTBALL

Those working within Professional Football including the PL, EFL, BWSL, BWC and Club Community Organisations should contact their Designated Safeguarding Lead or the FA DBS helpline for information and advice.



# 11. DBS CHECKS WHEN PROVIDING A SERVICE TO ADULTS AT RISK COST

Eligibility for a DBS Enhanced Criminal Record Disclosure with Vulnerable Adults Barred List Check is currently only required for registered Healthcare Professionals; Doctors, Physiotherapists or individuals who provide intimate personal care to Adults (excludes First Aiders). For more information contact your CFA, DSO or the FA DBS helpline.



# 12. USING THE DBS UPDATE SERVICE

The Update Service is a Government service which allows people to potentially use the same DBS Disclosure across multiple organisations provided the type of check is correct for their different roles.

To use this service, you must:

1. Register your DBS Disclosure with the Disclosure and Barring Service within 19 days of issue.
2. Inform the FA DBS helpline of your registration details. There is a one-off £10 administration charge. Once registered The FA DBS Unit will make annual checks on your DBS Check status for the duration of your time in football. Note the Disclosure and Barring Service charges Applicants £13/yr for use of the Update Service.

# 13. FAQs

## WHO NEEDS AN ENHANCED DBS CHECK?

Those working in the children's 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 anytime 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.

Supervision is defined by legislation as:

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

## HOW CAN I CHECK IF A DISCLOSURE HAS BEEN FA ACCEPTED?

Your CWO or Club Secretary will be able to check on The FA's *Club Portal*.

The Disclosure will display as *Accepted* along with the *Disclosure issue and expiry dates*.

## 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.

Clubs must ensure all newly-appointed individuals hold a FA Accepted DBS prior to working unsupervised with children and young people. Where individuals are renewing their FA DBS Check they can continue to work with children and young people so long as their renewal has been submitted to the DBS and is displayed on The FA Club Portal as in progress.

Club Welfare Officers and Secretaries should use The FA's Club Portal safeguarding page to check DBS Disclosures have been *Accepted*.

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

The FA is fair and has a duty to make sure the information provided on a Disclosure 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 also undertakes a process to filter out old and minor convictions and cautions. To find out what Police National Computer (PNC) information will be filtered from inclusion on a DBS Certificate visit [gov.uk](http://gov.uk) [here](#).

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 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 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 the situation. When the enquiry process is complete and The FA is satisfied, the Disclosure will be treated as if it were clear of convictions and will be displayed as Accepted on The FA's Club Portal and any information shared as part of the process will be deleted/shredded in accordance with the law. You will receive a letter telling you when this happens.

To speak to anyone in confidence about your history or to ask about this process please call The FA DBS helpline on 0115 969 4518 or email [FAChecks@TheFA.com](mailto:FAChecks@TheFA.com)

More information can be found in The FA's [Policy Statement on Recruiting Ex-Offenders; Guidance notes 3.4](#)

# 14. FA DBS HELPLINE

## WHAT IF THE INFORMATION ON THE DBS CERTIFICATE 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. Follow the process detailed on the back of the Disclosure.

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.

## 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 Disclosure. The Club can access the details they need by using The FA's Club Portal safeguarding page. You do not need to show your Disclosure to anyone outside The FA's recruitment process.

The FA may however ask you to share your Disclosure with the County Designated Safeguarding Officer or in the designated

safeguarding lead in English Football League or Community Club Organisation if they are 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 (and assistant CWOs), Club Secretaries (and assistant Secretaries), EFL/BWSL/BWC Designated Safeguarding Leads and County FAs can use The FA Club Portal safeguarding page to see if your Disclosure has been Accepted by The FA. This portal also shows your Safeguarding Children training record.

If there is a criminal history the set process outlined in FAQ What if there is something on the DBS Certificate is followed.

## HELPLINE CONTACT DETAILS:

[FAchecks@TheFA.com](mailto:FAchecks@TheFA.com)

0115 969 4618

## FIRST ADVANTAGE (FADV) LIVE CHAT:

<https://help.fadv.com/s/thefa>

# 15. KEY WORDS AND PHRASES

WORD/PHRASE	EXPLANATION
Adults at Risk	The law (relating to DBS checks) defines a vulnerable adult (described as an adult at risk by The FA) as someone who is 18 years old or over and who is receiving a specific service specifically because they are elderly, ill or disabled
BWSL	Barclays Women's Super League
BWC	Barclays Women's Championship
CCO	Club Community Organisation
CFA	County Football Association
Club Portal	FA Club Administration system
CWO	Club Welfare Officer
DSO	Designated Safeguarding Officer
DBS	Disclosure and Barring Service
Disclosure/Disclosure Certificate	Disclosure sent to the applicant detailing the type of check carried out and all criminal history (warnings, reprimands, cautions and convictions) released by the Police relevant to the post for which the Disclosure has been requested
DBS Check	Disclosing and Barring Service (DBS) Enhanced Criminal Record with Children's Barred List Check
EFL	English Football League
Eligibility	Eligibility is governed by legislation. In brief it means an Enhanced DBS Enhanced Criminal Record Disclosure with Children's Barred List Check is required for anyone aged 16 or over who undertakes any regulated activity ie potentially unsupervised activity working directly with children and young adults under the age of 18

WORD/PHRASE	EXPLANATION
FA DBS Check	Disclosing and Barring Service (DBS) Enhanced Criminal Record with Children's Barred List Check carried out for The FA for those roles providing regulated activity to children
FA WNL	FA Women's National League
NLS (1-4)	National League System, Steps 1-4
FA online DBS service/ Online Disclosures	Online application process used to obtain a DBS Disclosure
PL	Premier League
RDO	Referee Development Officer
Regulated activity	<p>The Protection of Freedoms Act, 2012, identified regulated activity as specific activities with children, carried out frequently or intensively, which are unsupervised.</p> <p>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.</p> <p>Frequently means at any time on more than three days in any period of 30 days, or anytime 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.</p> <ul style="list-style-type: none"> <li>• Supervision is defined by legislation as</li> <li>• Regular;</li> <li>• Day to Day</li> <li>• Reasonable in all circumstances for protecting children; and</li> <li>• Carried out by someone in regulated activity</li> </ul>
YLWO	Youth League Welfare Officer

# 16. OTHER USEFUL DOCUMENTS

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Guidance Notes:

[3.1: Safer Recruitment of Volunteers in Grassroots Football](#)

[3.2 The FA DBS Checks](#)

[3.3 Eligibility of roles](#)

[3.4 Recruitment of Ex-Offenders](#)

[3.5: FA Policy on handling of DBS Check certificates](#)

[5.1 Appointing a Club Welfare Officer](#)

[5.3 The FA Club Welfare Officer Roles Responsibilities](#)

UK.Gov Definition of a volunteer

[DBS Check application process for volunteers - GOV.UK \(www.gov.uk\)](#)

DBS ID checking guidelines

[ID checking guidelines for countersignatory applications - GOV.UK \(www.gov.uk\)](#)



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