

Safeguarding Procedure

Title	Last revision	Author	Next Revision
Safeguarding Procedure, Version 1.7	20.06.17	Lewis Boyd	
	20.06.19	Sarah Jones & Charles Rice	
	22.03.21	Simon Tatton-Brown	
Safeguarding Procedure, Version 1.8	24.04.22	Simon Tatton-Brown & Virginia Knight	
	09.03.23	Trustees Meeting/ Simon Tatton-Brown	March 2024
Safeguarding Procedure, Version 1.9	06.03.2024	Trustees Meeting/ Virginia Knight & Simon Tatton-Brown	March 2025
Safeguarding Procedure, Version 1.9	13.03.2025	Safeguarding Procedure, Version 1.9	March 2026

Document history

Version	Date	Author	Details
1	9 th April 2014	Lewis Boyd	Initial version
1.1	27 th April 2014	Lewis Boyd	Added list of ID documentation
1.2	8 th July 2014	Lewis Boyd	Review comments from Church Council included
1.3	12 th May 2016	Lewis Boyd	Added clarifications about DOs and DON'Ts
1.4	2 nd November 2016	Lewis Boyd	Updated responsibilities section for relevance during re-cruiting Added section for corporate memory of safeguarding disclosures Updated section on CC process when forms are returned Updated references to latest Diocesan policy
1.5	19 th March 2017	Lewis Boyd	Clarify points of contact for reporting abuse Revised Church Of England policy links Clarified role of safeguarding person in relation to clergy DBS checks
1.6	25 th April 2017	Sarah Jones / Lewis Boyd	Title amended to "Procedure", not "Policy", added cross-reference to Safeguarding Policy for Christ Church, Julian Road, Bath Updated links to COE policy document

			<p>Added reference to Charity Commission guidance for trustees to charitable organisations</p> <p>Clarified responsibility extends to the entire community</p> <p>Added section on responding to concerns, recognising abuse and Training</p>
1.7	20 th June 2017	Lewis Boyd	<p>Clarified terms “Safeguarding Officer” and “Diocesan Safeguarding Advisor” and reporting responsibilities</p> <p>Minor grammatical corrections</p>
1.7	7 th September 2017	Lewis Boyd	Ratified at Trustees meeting
1.7	20 th June 2019	Sarah Jones and Charles Rice	Reviewed current content and agreed scheduled update within the next 6-months
1.7	17 th May 2020	Lewis Boyd and Simon Tatton-Brown	Amended at Trustees meeting to require Chair of Trustees and Treasurer of the Trustees to have an enhanced DBS check and undergo training
1.7	22 March 2021	Simon Tatton-Brown	<p>Reformat the policy and number paragraphs to conform with Christ Church housestyle</p> <p>Minor grammatical corrections</p> <p>Paras 2.2, 9.4 & 11 re-written because the previous references were out of date.</p> <p>Add new section “Reporting Serious Safeguarding Incidents to Charity Commission” added on advise of Diocesan Safeguarding Advisor</p>
1.8	24 April 2022	Simon Tatton-Brown & Virginia Knight	Updated to cover new recruitment guidelines, correct paragraph numbers and other typos.
1.9	12 March 2023	Simon Tatton-Brown & Virginia Knight	Addition of Organ Scholar to list in 2.3 and further clarification in Section 10 & 11.

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I Introduction

- 1.1 Christian communities should be places where all people feel welcomed, respected and safe from abuse. The Church is particularly called by God to support those less powerful and those without a voice in our society. Christ Church will foster and encourage best practice within its community by setting standards for working with children, young people and vulnerable adults. It will work with the Diocesan Safeguarding team, statutory bodies, voluntary agencies and other faith communities to promote the safety and well-being of children, young people and vulnerable adults.
- 1.2 We are committed to acting within 24 hours whenever a concern is raised about a child, young person or vulnerable adult or about the behaviour of an adult in a position of trust, and will work with the Diocesan Team, and the appropriate statutory bodies when an investigation is necessary. We are also committed to the support of those who have been abused and to listening to the voices of survivors, who can help the church learn lessons from the past.
- 1.3 This document should be read in conjunction with the official Safeguarding Policy for Christ Church, Julian Road, Bath, as ratified by the Trustees. It details the following:
- Who at Christ Church should be considered for enhanced (Disclosure and Barring Service, hereafter referred to as DBS) vetting
 - How this process should be applied
 - Who is responsible for what at Christ Church
 - How a memory of any safeguarding disclosures or issues is maintained by the Church
 - How safeguarding should be considered during recruitment
- 1.4 It is not intended to:
- Define terminology.
 - Describe abuse definition, patterns or signs.
 - Define procedures for reporting abuse to persons outside of Christ Church.
- 1.5 For these latter points, refer to the Church of England national policy & practice guidance including the Safeguarding policy 2018, a copy of which can be found in the Christ Church office, or online at:

<https://www.churchofengland.org/sites/default/files/2019-10/ParishSafeGuardingHandBookAugust2019Web.pdf>

(Hyperlink accessed 12.03.2025).

See also:

<https://www.churchofengland.org/safeguarding/policy-and-practice-guidance>

(Hyperlink accessed 12.03.2025).

- 1.6 A copy of this Safeguarding Procedure document and the church's Safeguarding Policy, the contact details of the Safeguarding Officer and other information required by the Diocesan or National safeguarding team should be visibly and accessibly displayed in the main body of the church and in the Lower Mews.

2 Applicability

- 2.1 All persons who are likely to have any one-on-one contact with children or vulnerable adults in a context where other responsible adults may not be present during any official Church activities on Christ Church owned premises or off premises during official Christ Church events should be subjected to enhanced DBS vetting.
- 2.2 For a full description of "neglect and abuse of children and adults", please refer to the Church Of England Safeguarding Handbook, sections 3 & 4 (<https://www.churchofengland.org/safeguarding/policy-and-practice-guidance> Hyperlink accessed 12.03.2025).
- 2.3 Therefore, persons undertaking the following roles, termed "applicable roles", should be subject to enhanced DBS checking:
 - Licensed clergy and clergy with Permission to Officiate
 - Readers
 - Chair of Trustees
 - Treasurer of Trustees
 - Safeguarding Officer
 - Director of Music
 - Assistant Director of Music
 - Organist & Organ Scholar
 - Junior Church leaders
 - Wardens
 - Verger
 - Cedar Tree organisers
- 2.4 It is assumed that the process for application for DBS vetting of the Priest in Charge, assistant clergy, readers, and any other persons licenced to preach or officiate at Christ Church are covered by the Diocese as a part of their permission to officiate, and therefore not included specifically within the Christ Church policy. This however does not remove the need for the

Safeguarding Officer, on behalf of the trustees, to review and approve their DBS status prior to commencing work at Christ Church. Should this situation ever change, the list of applicable roles must be amended accordingly.

- 2.5 In addition, the Charity Commission recommends that DBS checks should be obtained for trustees of charities which work with children or vulnerable adults, although it is noted that *the position of trustee of a children or vulnerable adults charity is not a regulated activity in itself*. For more information see the Charity Commission guidance CC30 Finding new trustees available here: <https://www.gov.uk/government/publications/finding-new-trustees-cc30/finding-new-trustees> (hyperlink accessed 12.03.2025).

3 The Process

- 3.1 The procedure for completing the enhanced DBS checks at Christ Church is:

3.1.1 The Safeguarding Officer or DBS administrator shall contact all persons who intend to undertake an applicable role, termed the “applicant” to inform them of the need for the check.

3.1.2 The safeguarding officer or DBS administrator will obtain the applicant's email address and arrange for an invitation to be sent to them. On receipt of the invitation, the applicant will complete the online application, including uploading images of their personal identification documents. Refer to Appendix A for a list of the required personal identification documentation.

If they cannot submit images of their personal identification documents, they may present them to the safeguarding officer or DBS administrator for verification.

The safeguarding officer or DBS administrator will complete Section Y and submit the application

If the applicant does not have an email the procedure is as follows:

3.1.3 The applicant and the safeguarding officer or DBS administrator shall arrange to meet for a face-to-face interview and to make the application via the online portal.

- This meeting can be arranged on a case-by-case basis to be for example at the church, at the safeguarding officer’s home, or the applicant’s home.
- Access to the internet will be required for the application process.
- The interview and online application do not typically take more than 30 minutes.

3.1.4 As a part of this online application, the applicant will need to provide original personal identification documents to the safeguarding officer for verification. Refer to Appendix A for a list of the required personal identification documentation.

3.1.5 Once the application has been submitted, it usually takes 2-3 weeks for a response, although it may arrive more quickly or more slowly.

3.1.6 Upon receipt of a DBS certificate in the case of a successful application, the applicant

shall make a further appointment with the safeguarding officer or DBS administrator to verify the certificate.

3.1.7 The safeguarding officer or DBS administrator shall check that the resulting DBS certificate contains correct information. The applicant may now perform the duties for which they have received the DBS certificate.

3.1.8 Upon receipt of a response from the DBS which indicates any issues, the applicant shall arrange to meet with the Safeguarding Officer (not the DBS administrator) to discuss the next steps in the process. In such a situation, the applicant must not perform the duty for which they were applying.

4 Recruitment

4.1 All those that are involved in the recruitment of both paid and volunteer roles should have completed safer recruitment training, and as a minimum at least one person on any recruitment panel will have completed the Church of England's safer recruitment pathway.

<https://www.churchofengland.org/safeguarding/safeguarding-e-manual/safer-recruitment-and-people-management-guidance> (Hyperlink accessed 12.03.2025)

5 Record keeping and corporate memory

5.1 In order to ensure that proper and complete records are kept, and that any specific historic safeguarding issues (e.g. disclosures, rejected DBS applications) are well recorded for future reference by new persons of responsibility, the following record keeping guidelines shall be followed:

5.2 The Safeguarding Officer shall retain a secure register of the following:

- List of all current DBS certificates/certified persons from Christ Church (with the exception of clergy, readers and other persons licenced to officiate, per the note in the section above)
- List of when all current DBS certificates expire
- Any correspondence with the Diocese in relation to DBS applications
- Any correspondence with the Diocese or other official body or person (such as the police) regarding any safeguarding issue.

5.3 The secure archive can be either physical or electronic copies, as per the preference of the Safeguarding Officer, but must take into consideration data security, in accordance with the Christ Church Trustee's policy for the Processing of Personal Data which states in relation to storing safeguarding data that: **“Particular care must be taken to ensure this data is stored securely, and only accessible to those who have a legitimate need to use it. This must include password protection and/or appropriate encryption for electronic data and locked, secure storage for paper records.”** The list of DBS certificates/certified persons and DBS certificate expiry dates should be accessible to the DBS administrator if one exists, and may be recorded on a safeguarding hub, dashboard or other content managing system supplied by diocesan or national

safeguarding teams. Correspondence relating to actual safeguarding-related incidents or concerns is confidential and should be securely stored by the Safeguarding Officer.

- 5.4 The Priest In Charge shall be informed of all safeguarding issues.
- 5.5 This is to ensure the Priest In Charge is informed in the event of external contact (police, press etc.), and to ensure that the correct and appropriate pastoral care can be offered.
- 5.6 The Safeguarding Officer shall brief the Priest In Charge of any relevant historic safeguarding issues when he/she takes up the role.
- 5.7 The Safeguarding Officer shall hand over the archive and knowledge of any historic safeguarding issues when the Safeguarding Officer steps down from his/her role to the new Safeguarding Officer.

6 Responsibilities

- 6.1 The safeguarding and protection of children, young people and vulnerable adults is everyone's responsibility, not just parents or those who have formal leadership or caring responsibilities. Procedures and formal processes alone, though essential, will not protect children and adults. The community, including all its members, needs to be aware of the dangers and be prepared to report concerns and take action if necessary. However, certain individuals do have key responsibilities:

7 The Safeguarding Officer

- 7.1 The Safeguarding Officer is responsible for ensuring that all persons undertaking an applicable role are covered by a valid, current enhanced DBS check. This responsibility extends from arranging for the applicant to have access to the online application portal through the application via the Diocese until the DBS certificate is received back by the applicant and its authenticity is checked by the Safeguarding Officer.
- 7.2 The Safeguarding Officer shall maintain an up-to-date list of all persons who require enhanced DBS vetting, and maintain a record of the currently active DBS certificates. This list shall include a note of when the DBS certificate expires. This shall be kept electronically, in a suitably secure format (such as an encrypted drive or password-protected safeguarding dashboard or hub). These records may also be accessed by the DBS administrator if one exists.
- 7.3 The Safeguarding Officer shall ensure that new employees and volunteers in applicable roles are informed about the DBS checking procedure and the personal identification documents required, and that the guidance on Safer Recruitment and People Management is being followed.
- 7.4 The Safeguarding Officer shall be responsible for ensuring their contact details and the details of the Diocesan Safeguarding Advisor are made available for reporting of any safeguarding issues, and that the required safeguarding information is on display in all church premises. They should also ensure that this safeguarding information is accessible via a prominent front-page link on the church website.

- 7.5 The Safeguarding Officer shall determine who, if anyone, other than the Diocesan Safeguarding Advisor needs to be informed of any disclosure or concern. Responsibility of informing the Trustees then rests with the Diocesan Safeguarding Advisor. This is to ensure the best possible confidentiality and protect the privacy of any individuals.
- 7.6 The Safeguarding Officer is responsible for ensuring that safeguarding training pathways are completed by all church officers and any others who are required to do them, in compliance with the directives of the Parish Safeguarding Handbook and/or other diocesan or national requirements.
- 7.7 The Safeguarding Officer is responsible for ensuring that the following policies and other documents exist and are reviewed every 12 months by the Trustees:
- The church's Safeguarding Policy
 - The church's Safeguarding Procedure (this document)
 - The church's Safeguarding Action Plan
 - Recruitment of Ex-offenders Policy (review period as directed)
- 7.8 The Safeguarding Officer is responsible for monitoring the safeguarding status of any church activity involving children, young people or vulnerable adults, as follows:
- Church Council authorisation for the activity (to be reviewed if there is a change in the activity's status or risks)
 - Risk assessment (to be reviewed every 2 years)
 - Insurance cover (to be reviewed if not covered by standard church insurance cover)
 - Role descriptions for leaders and helpers (to be reviewed every year)
 - Compliance with safer recruitment (to be reviewed every year)
 - DBS checks (to be reviewed every year)
 - Induction process and settling in period (to be reviewed every year)
 - Safeguarding training (to be kept under review)
 - Ongoing support and oversight (to be reviewed every year)
- 7.9 The safeguarding officer is to check that there is compliance in the following areas:
- Lone (i.e. one-to-one) working (to be reviewed every two years)
 - Appropriate boundaries (to be reviewed every two years)
 - Churchwardens to be aware of safeguarding responsibilities (to be reviewed every year)
- 7.10 The Safeguarding Officer is to report as follows:
- Twice yearly to the Trustees
 - Annually to the church AGM
 - As required to the priest in charge
- 7.11 The Safeguarding Officer is to read and if necessary act on information supplied to them by the Diocesan Safeguarding team or other safeguarding-related authority, and to raise relevant concerns (that do not relate to actual allegations or incidents) with the Diocesan team in an appropriate way. They are expected to be prepared to advise on any safeguarding-themed liturgy.

8 The Trustees

- 8.1 The Chair of Trustees shall inform the Safeguarding Officer of all new proposed employees before the employment begins if the person is likely to undertake an applicable role, to ensure timely completion of the Safeguarding process.
- 8.2 Per the Diocesan policy, employment must not begin before this process is completed. If this is not possible or does not happen, the Diocese Safeguarding Advisor must be contacted by the Chair of Trustees in order to ensure the proper and appropriate additional safeguards (e.g. restrictions on terms of employment until a valid DBS certificate is received) are put in place by the Trustees.
- 8.3 All Trustees should complete the Basic safeguarding pathway, or other safeguarding-related training, in compliance with the directives of the Parish Safeguarding Handbook and/or other diocesan or national requirements. In addition, the Chair of Trustees should complete the Foundation pathway and the Safer Recruitment and People Management pathway.

9 The Church Council and other Church Officers

- 9.1 The Church Council, through the Chair of the Church Council, are responsible for reporting all volunteers for applicable roles, before they begin their work, to the Safeguarding Officer, to ensure timely completion of the Safeguarding process.
- 9.2 All Church Council members should complete the Basic and Foundation Safeguarding pathways and the Domestic Abuse pathway, or other safeguarding-related training, in compliance with the directives of the Parish Safeguarding Handbook and/or other diocesan or national requirements.
- 9.3 All Church Officers who are not Trustees or Council members should complete the Basic Safeguarding pathway, or other safeguarding-related training, in compliance with the directives of the Parish Safeguarding Handbook and/or other diocesan or national requirements.

10 Responding to concerns

- 10.1 **If somebody believes that a child, young person or vulnerable adult may be suffering, or is at risk of harm that person should take the concerns seriously and always, without delay, make an immediate referral of the concerns to a statutory agency.**

10.2 In all cases the Diocesan Safeguarding Adviser should be informed. Tel: 01749 588917 (office hours, Mon-Fri). **On line reporting form.** (hyperlink checked 12.09.23.)
Tel: 0303 003 1111 (other times). This should be used if necessary 5pm to midnight Monday to Friday, 7am to midnight on Saturday and Sunday, and on bank holidays or other times when the Diocesan safeguarding office is closed.

10.3 The key contacts at Christ Church who would be expected to manage a disclosure of possible abuse are:

- The Priest-in-Charge
- The Safeguarding Officer
- The Junior Church coordinator
- A Churchwarden
- The Director of Music.

Those managing any disclosure should be restricted to as few as possible to protect confidentiality.

10.4 If any of the officers named in 10.3 above are subject of a complaint, it is important that the Diocesan Safeguarding Officer be informed as soon as possible, and that the person concerned will not manage the complaint or disclosure of possible abuse in any way.

10.5 More information about the process to be followed can be found at <https://www.churchofengland.org/safeguarding/reporting-abuse-and-finding-support> (Hyperlink accessed 12.03.2025) or <https://www.bathandwells.org.uk/diocese/safeguarding/reporting-concerns-or-abuse/> (Hyperlink accessed 12.03.2025) which also has the names and contact details (including out of office hours) of the Diocesan Safeguarding Team.

II Reporting Safeguarding Serious Incidents to the Charity Commission

11.1 “A safeguarding Serious Incident is an adverse event, whether actual or alleged, which results in or risks significant harm to the charity’s beneficiaries, employees, office holders, volunteers or to others who come into contact with the charity through its work. This includes where there are allegations or incidents of abuse of or risks to beneficiaries or others connected with the charity’s activities. What is considered to be “significant” is a matter for the trustees to determine, as it will depend on the context of the charity, taking into account its operations, staff, finances and reputation.” (Quotation from *Guidance for Religious Communities: Identifying Safeguarding Serious Incidents and Reporting to the Charity Commission*, page 2.)

11.2 The Church of England has worked with the Charity Commission to agree bespoke guidance for DBFs, PCCs and Religious Communities on how to identify and report a safeguarding Serious Incident.

11.3 Because Christ Church is a registered Charity in its own right, it is the responsibility of the Trustees (and not the Diocesan Safeguarding Adviser) to report a safeguarding Serious Incident

to the Charity Commission. This will be done by the Christ Church Safeguarding Officer on behalf of the Trustees, who will (observing confidentiality protocols) inform the Secretary to the Trustees.

<https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity> (Hyperlink accessed 12.03.2025)

- 11.4 The Safeguarding Officer shall also report a safeguarding Serious Incident to the Diocesan Safeguarding Adviser and to the Church of England National Safeguarding Team. This must be done within 24 hours of becoming aware of the incident.

12 Definitions of forms of harm and abuse

- 12.1 It is beyond the scope of this policy to give detailed guidance on the types and signs of abuse. Such issues should be covered in the training given to relevant church officers. Descriptions can also be found in the Church of England Parish Safeguarding Handbook, sections 3 & 4 (pages 7ff)

<https://www.churchofengland.org/sites/default/files/2019-10/ParishSafeGuardingHandBookAugust2019Web.pdf> (Hyperlink accessed 12.03.2025).

13 Training

- 13.1 The Diocesan Safeguarding Trainer, along with volunteer trainers from across the Diocese provide a range of training courses in safeguarding situated within the context of the Church. The courses aim to equip participants with the knowledge and skills in knowing what, when and how to report concerns and to embed healthy safeguarding practice. Everyone that fulfils a Church role is encouraged to undertake safeguarding training, (the level of which is dependent upon their role) at least once every three years. A basic awareness course (level C0) is now available on-line but anyone requiring a DBS check for their role requires at least Foundation (level C1) training. More details are available on the Bath & Wells website here:

<http://www.bathandwells.org.uk/diocese/safeguarding/safeguarding-training/>
(Hyperlink accessed 12.03.2025).

- 13.2 The Safeguarding Officer should undertake to keep their own training up to date and identify what training is required of church officers and others associated with Christ Church. They may delegate the task of issuing instructions that training is due, and reminders of those instructions, to other appropriate individuals. A record must be kept of training that has been completed, using the Safeguarding dashboard or hub or by other means. The task of keeping this record may be delegated to an assistant.

14 The Safeguarding Officer (contact details)

- 14.2 At the time of the latest date of issue of this document, the Safeguarding Officer is:

Virginia Knight

07896 916840

christchbathsafeguarding@gmail.com

15 Additional resources

- 15.2 The Safeguarding Policy for Churches (Children & Adults at Risk) revised April 2023 can be found at:
<https://fcofe.org.uk/wp-content/uploads/2023/05/Safeguarding-Policy-for-churches-Revised-2023.pdf>
(Hyperlink accessed 12.03.2025).
- 15.2 In particular, please consider the Parish Safeguarding Handbook (2018)
<https://www.churchofengland.org/sites/default/files/2019-10/ParishSafeGuardingHandBookAugust2019Web.pdf> (Hyperlink accessed 12.03.2025).
- 15.3 The diocesan guidance and contact details can be found here:
<http://www.bathandwells.org.uk/diocese/safeguarding/>
(Hyperlink accessed 12.03.2025).

Appendix A – List of documentation required for proving identity

- 16.1 The following can also be found on the Home Office website:
<https://www.gov.uk/criminal-record-check-documents> (Hyperlink accessed 12.03.2025).
- 16.2 The person going through a DBS check (the applicant) must give their employer original documents to prove their identity (not copies). The documents needed will depend on the route the application takes. The applicant must try to provide documents from Route 1 first.
- Route 1
 - The applicant must be able to show:
 - 1 document from Group 1, below
 - 2 further documents from either Group 1, or Group 2a or 2b, below
 - At least 1 of the documents must show the applicant's current address.
 - Route 2
 - If the applicant doesn't have any of the documents in Group 1, then they must be able to show:
 - 1 document from Group 2a
 - 2 further documents from either Group 2a or 2b
 - At least 1 of the documents must show the applicant's current address. The organisation conducting their ID check must then also use an appropriate external ID validation service to check the application.
 - Route 3
 - Route 3 can only be used if it hasn't been possible to process the application through Routes 1 or 2.
 - For Route 3, the applicant must be able to show:
 - a birth certificate issued after the time of birth (UK and Channel Islands)

- 1 document from Group 2a
- 3 further documents from Group 2a or 2b
- At least 1 of the documents must show the applicant's current address. If the applicant can't provide these documents they may need to be fingerprinted.

Group 1: Primary identity documents

Document	Notes
Passport	Any current and valid passport
Biometric residence permit	UK
Current driving licence – photo card with counterpart	UK/Isle of Man/Channel Islands (full or provisional)
Birth certificate - issued at time of birth	UK and Channel Islands – including those issued by UK authorities overseas, e.g. embassies, High Commissions and HM Forces

Group 2a: Trusted government documents

Document	Notes
Current driving licence – old-style paper version	UK
Current photo driving licence	Non-UK licences must be valid for up to 12 months from the date the applicant entered the UK
Birth certificate – issued after time of birth	UK and Channel Islands
Marriage/civil partnership certificate	UK and Channel Islands
Adoption certificate	UK and Channel Islands
HM Forces ID card	UK
Firearms licence	UK, Channel Islands and Isle of Man

Group 2b: Financial and social history documents

Document	Notes	Issue date and validity
Mortgage statement	UK or EEA	Issued in last 12 months

Document	Notes	Issue date and validity
Bank or building society statement	UK and Channel Islands or EEA	Issued in last 3 months
Bank or building society account opening confirmation letter	UK	Issued in last 3 months
Credit card statement	UK or EEA	Issued in last 3 months
Financial statement, e.g. pension or endowment	UK	Issued in last 12 months
P45 or P60 statement	UK and Channel Islands	Issued in last 12 months
Council Tax statement	UK and Channel Islands	Issued in last 12 months
Work permit or visa	UK	Valid up to expiry date
Letter of sponsorship from future employment provider	Non-UK or non-EEA only - valid only for applicants residing outside of the UK at time of application	Must still be valid
Utility bill	UK – not mobile telephone bill	Issued in last 3 months
Benefit statement, e.g. Child Benefit, Pension	UK	Issued in last 3 months
Central or local government, government agency, or local council document giving entitlement, e.g. from the Department for Work and Pensions, the Employment Service, HMRC	UK and Channel Islands	Issued in last 3 months
EU National ID card	-	Must still be valid
Cards carrying the PASS accreditation logo	UK and Channel Islands	Must still be valid
Letter from head teacher or college principal	UK - for 16 to 19 year olds in full time education - only used in exceptional circumstances if other documents cannot be provided	Must still be valid