**PVG Expansion Programme**

**July 2025**

1. **Introduction**

Disclosure Scotland has implemented significant changes from 1st July 2025. These changes mean that membership of the PVG Scheme becomes mandatory for anyone in a ‘regulated role’. Further information on these changes is available via the following links:

[**Changes to Protecting Vulnerable Groups scheme**](https://scottish.sharepoint.com/sites/GGC-Staffnet/SitePages/Changes-to-Protecting-Vulnerable-Groups-scheme-%E2%80%93-is-your-role-affected-.aspx)

[**Changes to our services - Disclosure Scotland**](https://www.disclosure.gov.scot/changes)

[**Pay and Conditions of Service - NHSGGC**](https://www.nhsggc.scot/staff-recruitment/hrconnect/pay-and-conditions-of-service/)

It is a criminal offence for a person to work in a regulated role without a PVG check from 1st July 2025.

# Original Deadline

Any worker whose duties fall into the above category was legally required to be a member of the PVG Scheme or, have submitted their application to be a member of the PVG Scheme, by **30 June 2025**.

1. **Employees at Work: Non-Engagement**

If an employee does not apply for PVG by Sunday 10th August 2025, after following the below process, the NHS Scotland Workforce Investigation Policy will be invoked, unless there are extenuating circumstances.

* All employees who are at work but have not yet submitted an application to PVG should be contacted by their line manager using the template letter (Appendix 1). This letter can be emailed to the employee's work email, sent to their home address or available for the employee to collect from a secure point within their department.
* The letter template highlights that it is understood the employee has not yet applied for their PVG and advises of the requirement for the employee to apply by Sunday 10th August 2025 if this has not already been done. The letter also details that if the employee has not completed the PVG by this date, and there are no extenuating circumstances, then a formal investigation will commence in accordance with NHS Scotland Workforce Investigation Policy.
* Managers are asked to send the template letter to employees as soon as possible.
* Services should again consider designated areas/meeting rooms for employees to use to submit their application.

If an employee has not submitted a PVG application by 10th August 2025 and there are no extenuating circumstances, line managers should contact HR Support and Advice Unit to instigate a formal investigation.

[**HR Support and Advice Unit - NHSGGC**](https://www.nhsggc.scot/staff-recruitment/hrconnect/contact-hr-support-advice-unit/)

[**HRSAU Manager Support Information - NHSGGC**](https://www.nhsggc.scot/downloads/hrsau-manager-support-information/)

If an employee advises they have now completed and submitted their PVG application please contact [ggc.pvg.recruitment@nhs.scot](mailto:ggc.pvg.recruitment@nhs.scot) to ensure that central records are checked and updated.

**Extenuating Circumstances**

It is understood that there may be extenuating circumstances why an employee has been unable to submit their PVG application. This may include, but is not exhaustive to:

* Employee has been identified as being in a regulated role after the deadline of 30th June 2025.
* System errors with submitting the PVG application
* Employee has been required to request replacement copies of identification

To ensure there is a consistent approach applied across NHS Greater Glasgow and Clyde when considering extenuating circumstances and any appropriate actions in relation to the PVG application, managers are asked to complete: [**https://forms.office.com/e/EH1XZp8T3a**](https://forms.office.com/e/EH1XZp8T3a)

This will then be considered by a review panel. The outcomes of this panel will be confirmed to the appropriate manager as soon as possible. This may include, but is not exhaustive to:

* Extension agreed for 2 weeks
* Extension agreed for 4 weeks
* No extension agreed

1. **Employees Not at Work: Long-Term Leave**

Any employee who is not currently at work (e.g. long-term sickness, family leave, career break) should have already been made aware of the legal changes by their manager.

If it has not feasible to make contact in advance or the employee is unable to complete their application while on leave e.g. unfit to do so, managers must raise this immediately when discussing return-to-work arrangements.

If an employee returns to work without having applied for PVG, and there are no extenuating circumstances, the letter template (Appendix 1) should be updated and sent to the employee. The member of staff will be supported with a period of 2 weeks to ensure they apply. Services should consider designated areas/meeting rooms for employees to use to submit their application.

After the 2 week period, if the employee has still not submitted the PVG application, and there are no extenuating circumstances, then NHS Scotland Workforce Investigation Policy will be invoked.

Line managers should contact HR Support and Advice Unit to instigate a formal investigation.

* [**HR Support and Advice Unit - NHSGGC**](https://www.nhsggc.scot/staff-recruitment/hrconnect/contact-hr-support-advice-unit/)
* [**HRSAU Manager Support Information - NHSGGC**](https://www.nhsggc.scot/downloads/hrsau-manager-support-information/)

If the employee is returning to work/ has returned to work and advises of any [extenuating circumstances](#extcir), managers are asked to complete: [**https://forms.office.com/e/EH1XZp8T3a**](https://forms.office.com/e/EH1XZp8T3a)

This will then be considered by a review panel. The outcomes of this panel will be confirmed to the appropriate manager as soon as possible. This may include, but is not exhaustive to:

* Extension agreed for 2 weeks
* Extension agreed for 4 weeks
* No extension agreed

**APPENDIX 1**

|  |  |
| --- | --- |
|  |  |
| Private & Confidential | Date:  E-mail: |

Dear

**PVG Scheme Membership – Non-Engagement**

Disclosure Scotland implemented significant changes starting on 1st July 2025. These changes mean that membership of the PVG Scheme becomes mandatory for anyone in a ‘regulated role’. This new term moves the focus to what the person actually does and where they are based, not just their job title. The new criteria mean that a large number of additional people within NHSGGC now require a PVG check.

Following these changes, your role is now considered to be a ‘regulated role’ and requires you to have membership of the PVG Scheme.

Anyone whose role now requires a PVG was required to be a member of the PVG Scheme and should have submitted their application by 30 June 2025. This is a legal requirement, and it is a criminal offence to work in a regulated role without PVG Scheme membership from 1st July 2025 onwards.

I understand that you have been contacted by the Recruitment Team via email to advise you of the above changes and to request that you complete the process of applying to become a member of the PVG Scheme.

It is our understanding that, to date, you have not submitted an application. You are therefore asked to do so **immediately**, and no later than **Sunday 10th August 2025**.

If there are any mitigating circumstances that prevent you from applying before this date, please discuss these directly with your line manager as soon as possible. Where extenuating circumstances are presented, a summary of these will be submitted for a review panel to consider whether a further extension would be appropriate.

I must take this opportunity to reiterate that membership of the PVG Scheme is now mandatory for your role. Should an application not be submitted by the above deadline, and no valid reason provided, further formal action may be taken under the **NHS Scotland ‘Once for Scotland’ Conduct Policy**.

To start the process, you should:

1. complete the NHSGGC data collection survey\* (<https://forms.office.com/e/zD6RyNedHs>) ; and
2. forward ID (confirming your full name, current address and date of birth) to [ggc.pvg.recruitment@ggc.scot.nhs.uk](mailto:ggc.pvg.recruitment@ggc.scot.nhs.uk)

This provides the NHSGGC PVG Recruitment Team with the information required to commence a formal PVG application using the Disclosure Scotland platform. Please note that once you receive the link to submit your PVG application, there is 14 days before the link expires.

If you have any queries about completing the application, please contact the Recruitment Team at [ggc.pvg.recruitment@ggc.scot.nhs.uk](mailto:ggc.pvg.recruitment@ggc.scot.nhs.uk) who will be happy to assist.

Yours sincerely,

**<NAME>**

**<JOB TITLE>**

\* The NHSGGC Data Collection survey can also be accessed by scanning the following QR code:

