**PVG Expansion Programme**

**August 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.

# Deadlines

Any worker whose duties fall into the above category were 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**.

Internally, this was further extended to Sunday 10th August 2025 to provide a further opportunity for employees to ensure their PVG application was submitted.

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

An agreed process was implemented for line managers to use a template letter (as per the July Briefing) which was to 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 highlighted that it was understood the employee had not yet applied for their PVG and advised of the requirement for the employee to apply by Sunday 10th August 2025, if this has not already been done. The letter also detailed that if the employee did not completed the PVG by this date, and there were no [extenuating circumstances](#exten), then a formal investigation will commence in accordance with NHS Scotland Workforce Investigation Policy.

If an employee did not submitted a PVG application by 10th August 2025 and there were no [extenuating circumstances](#exten), 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 to ensure that central records are checked and updated.

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, 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 on their return to work. 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, 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**
1. **Extenuating Circumstances**

It is understood that there may have been extenuating circumstances why an employee was unable to submit their PVG application.

To ensure there was a consistent approach applied across NHS Greater Glasgow and Clyde, managers were asked to complete a MS Forms survey prior to the revised deadline of 10th August 2025. The availability of the MS Forms survey has been extended to 5pm on Thursday 14th August 2025, with the last panel review taking place on Friday 15th August 2025.

The panel reviewing the extenuating circumstance returns identified some key themes and guidance has been agreed:

1. **Employee who is no longer employed within NHSGGC**

This should be confirmed to ggc.pvg.recruitment@nhs.scot and requested that the employee be recoded to ‘not in scope’.

1. **Employee who is currently on sick leave**

The process detailed in [Section 3, Employees Not at Work: Long-Term Leave](#sick) should be followed.

1. **Employee is advising that they have completed the ID checks and submitted the application, but are still showing as not engaged.**

The process for applying for PVG has two main components; 1. Submitting ID and any required personal information to the PVG Recruitment Team, 2. Completing and submitting the PVG application to Disclosure Scotland.

If an employee has sent their ID and any required personal information to the PVG Recruitment team, the full process has not been completed. This is only the initial stage.

Once an employee has sent their ID and any required personal information to the PVG Recruitment team, they will then email the employee with a link in order to apply for the PVG membership via the Disclosure Scotland website.

Once the link has been provided, employees have 14 calendar days to access this and complete the PVG application via the Disclosure Scotland website. After the 14 calendar days, the link expires and the process requires to recommence.

Employees who have completed the initial stage and have been sent the application link by PVG Recruitment, but have not yet completed the PVG application, will be recorded as ‘application issued by Rec.’ [Please also refer to Section 5](#link).

1. **Employee is unable to complete the process electronically and has submitted the paper application.**

A paper PVG application form still requires to be signed by a NHSGGC counter-signatory. Therefore, all paper PVG application forms should be sent to:

PVG Recruitment Team

Ground Floor

Admin Building

Gartnavel Royal Hospital

If a paper PVG application form has been sent directly to Disclosure Scotland, without a NHSGGC countersignature, then it will not be progressed. Therefore, the employee will need to recommence the process. The employee is now required to recomplete the PVG paper application and submit this to PVG Recruitment by 31st August 2025. If the employee has still not submitted the PVG application within this period, then the NHS Scotland Workforce Investigation Policy will be instigated.

If a paper PVG application form has been submitted and countersigned by PVG Recruitment, there will be delays with the application process being completed by Disclosure Scotland due to manual requirements to process this.

If any employee has submitted the paper PVG application to PVG Recruitment by 31st August 20245, then no further action is required. The employee should be categorised as ‘application complete by employee’.

1. **Employee is waiting on the link to be emailed to them.**

Given the volume of PVG related information that needs to be processed by the PVG Recruitment team, there may be delays with issuing links.

Employees should ensure they also check their Junk/ Spam email folders.

Once an employee has sent their ID and any required personal information to the PVG Recruitment team, they will then provide the employee with a link in order to apply for the PVG membership via the Disclosure Scotland website.

Once the link has been provided, employees have 14 calendar days to access this and complete the PVG application via the Disclosure Scotland website. After the 14 calendar days, the link expires and the process requires to recommence.

If the employee fails to access the link and complete their application via the Disclosure Scotland website within 14 days then the NHS Scotland Workforce Investigation Policy will be instigated.

**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

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 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:

