

PROTECTION OF VULNERABLE GROUPS AND THE DISCLOSURE OF CRIMINAL INFORMATION:

CONSULTATION RESPONSE on behalf of UNIVERSITIES SCOTLAND

23 July 2018

Thank you for the opportunity to respond to the proposed changes to the PVG and disclosure systems. Overall, the proposed changes to the PVG and disclosure schemes seem positive and a significant step towards simplification and improvements in process. In particular, the reduction in the number of products, a move to online application and the focus on **protected roles** should streamline the process for applicants and provide much needed clarity on who should be a member of the PVG scheme.

We also welcome the introduction of a **renewal process for PVG membership**. This provides a much more proportionate approach by only continuing to monitor those active in protected roles.

The consultation team may, however, wish to consider whether the **proposed length of membership** options are appropriate for students training to enter protected roles. It would be unfortunate if the end of a membership period coincided with the “gap” between the end of a course and securing a first job in a protected role. The practicalities of the clustering of PVG applications amongst students might also be further considered; if that were then to be replicated at renewal points in future years.

Universities fully recognise the importance of PVG membership for our students training for protected roles as well as the importance placed on recruitment to these roles by Scottish Government. In this context, Universities would welcome a closer sector level working relationship with Disclosure Scotland to ensure that we are able to deliver against **Scottish Government admissions targets** for those programmes. At present, we have no means to expedite the PVG application of late admissions to our programmes; which can prevent the student from undertaking essential placements. This is particularly challenging in relation to the one-year PGDE initial teaching training programmes which have very little opportunity to repeat/recover lost placement time.

The consultation proposes the extension of PVG membership to encompass **protected roles undertaken overseas**. Universities are supportive of this approach; recognising the importance of organisations applying safeguarding standards across all of their activities whether undertake at home or abroad.

Finally, the **listing of protected roles** is broadly comprehensive and we recognise that many of our researchers working with children or adults receiving services will be in protected roles as medical, social work, or teaching professionals for example. However, it is likely that researchers in other disciplines will undertake work on research projects involving children and adults receiving services in the UK or overseas. We would suggest that this might merit further consideration of eligibility for PVG membership or perhaps a level 2 disclosure.

ENDS

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