

Protection of Vulnerable Groups and the Disclosure of Criminal Information

Summary Report

September 2018

Ministerial Foreword



I am grateful to all those who commented on our proposals for change in relation to the Protection of Vulnerable Groups and the Disclosure of Criminal Information, whether by responding to the public consultation or attending one of the consultation events. I hope this report has captured the wide range of views expressed. I think most people would agree that a review of the current system was due. The proposals outlined in the consultation document, and your responses to them, can create an improved system that balances safeguarding and proportionality.

It is important to highlight again that these proposals were created in conjunction with a wide range of stakeholders to develop a system that will simplify the disclosure regime and deliver it in a modern way. It is in everyone's interest that the aspects of the current system which are valued are maintained and strengthened.

All the comments received will be taken into consideration as the new system is developed. The consultation is not the end of our engagement, and we look forward to listening and working with stakeholders as we progress.

A handwritten signature in grey ink, which appears to read 'Maree Todd'.

Maree Todd
Minister for Children and Young People

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Acknowledgements

The Scottish Government thanks all individuals and organisations who took the time to consider and respond to this consultation.

Introduction

The consultation paper was published on 25 April 2018. The document was large and detailed: there were five sections in the consultation paper that sought stakeholders' views and asked 94 questions. Late responses were accepted.

The consultation was distributed to a large number of key stakeholders, including over 3,000 organisations registered to us as registered bodies. We received 352 responses, 268 from organisations and 84 from individuals.

The online consultation was designed to allow respondents to respond to only the areas that are relevant to them. Some respondents provided a written statement rather than using the consultation questionnaire.

Involvement in the development of our proposals

Our consultation paper is only the start of the process of involving those with an interest in our proposals and their continued development. We want to make sure that there will be opportunities to engage further as we prepare the draft legislation. The Scottish Parliament's consideration of the Disclosure Bill (which was announced in the Programme for Government, published 4 September 2018) will be accompanied by thorough scrutiny, including drawing on the expertise of those already involved in the system.

Responses

This report provides a summary of all the responses to the Scottish Government consultation on proposals for change to the Protection of Vulnerable Groups and Disclosure Regime in Scotland. The full analysis has been published alongside this summary.

There were 352 respondents. The majority only answered questions relevant to their expertise or interest.

Those who responded broadly came from:

- Public Sector (38)
- Third Sector (172)
- Private Business (19)
- Education (17)
- Health (22)
- Individuals (84)

There were 245 respondents who gave permission for their responses to be published. They can be found on the Citizen Space website at:

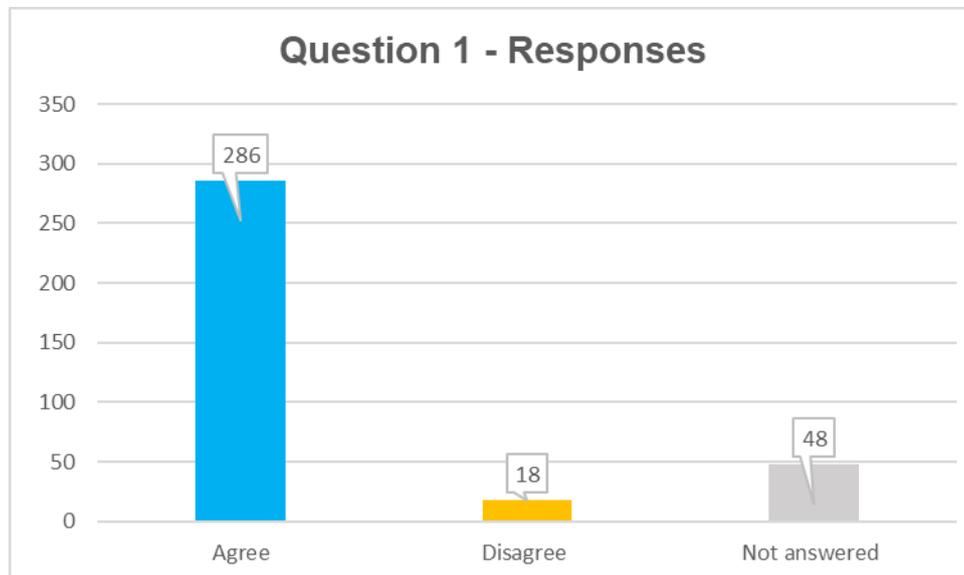
https://consult.gov.scot/disclosure-scotland/protection-of-vulnerable/consultation/published_select_respondent

Consultation Questions

There follows, in the order of the consultation paper, statistics about the number of responses to each question and how they were answered. Only Sections 2-6 of the consultation document asked questions. For a more in depth discussion of issues raised, see Part 2 of the full consultation document.

Section 2 - Disclosure Products

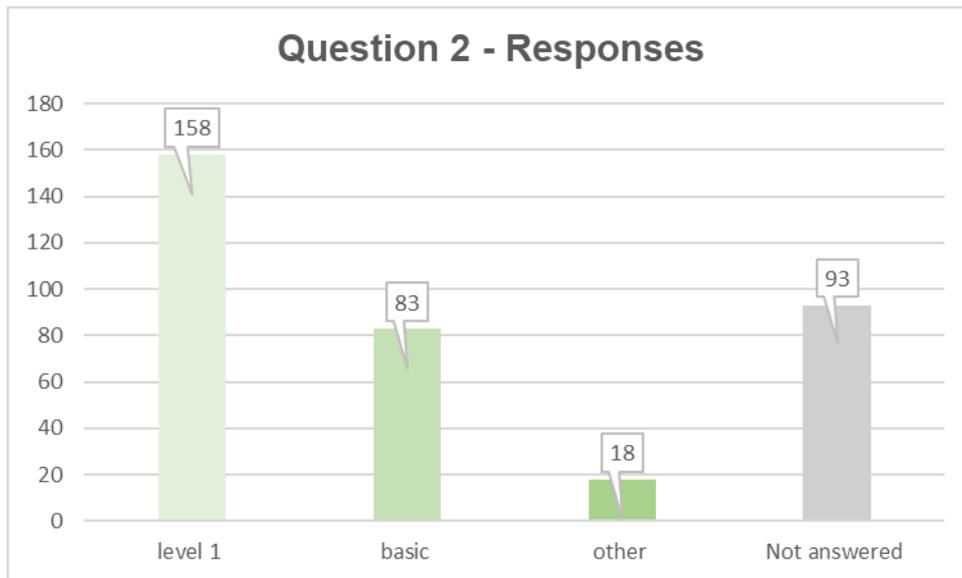
Question 1: Do you agree that reducing the disclosure products will simplify the system?



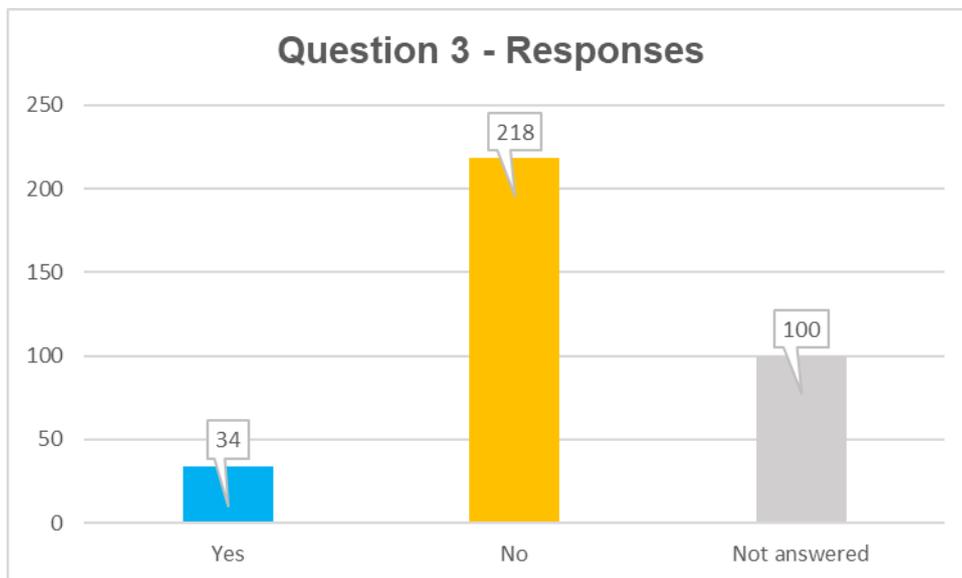
Question 1a: If you have answered no, what do you think will simplify the system?

- 34 responses to this question
- 9 responses detailed that reducing products wouldn't simplify the system and consideration of the principles that underpin the disclosure system is needed
- Complexity of current system stems from being underpinned by different pieces of legislation
- Support commitment to provide increased guidance

Question 2: As we are trying to simplify the system, do you have any views on what this product should be called?

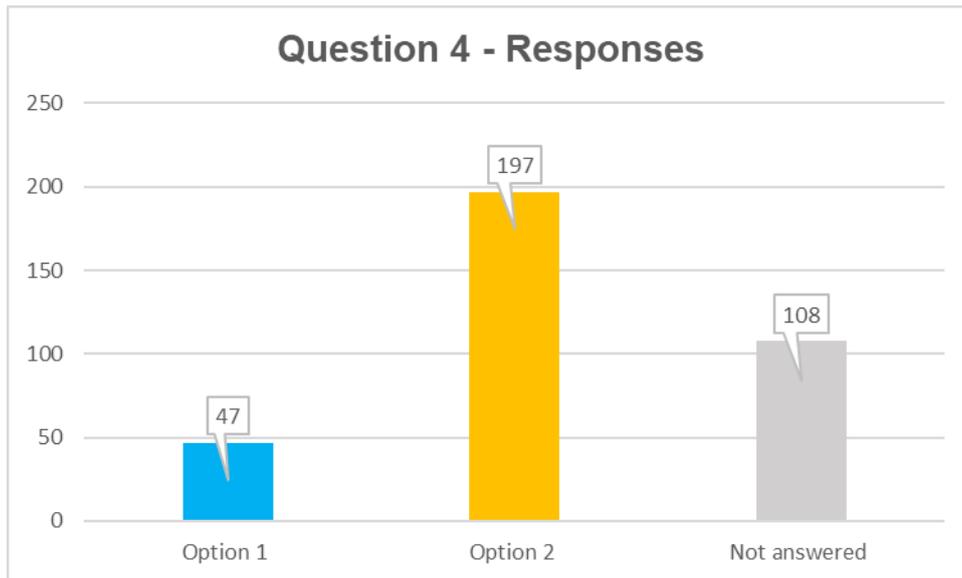


Question 3: As an applicant, do you have any concerns with this approach?

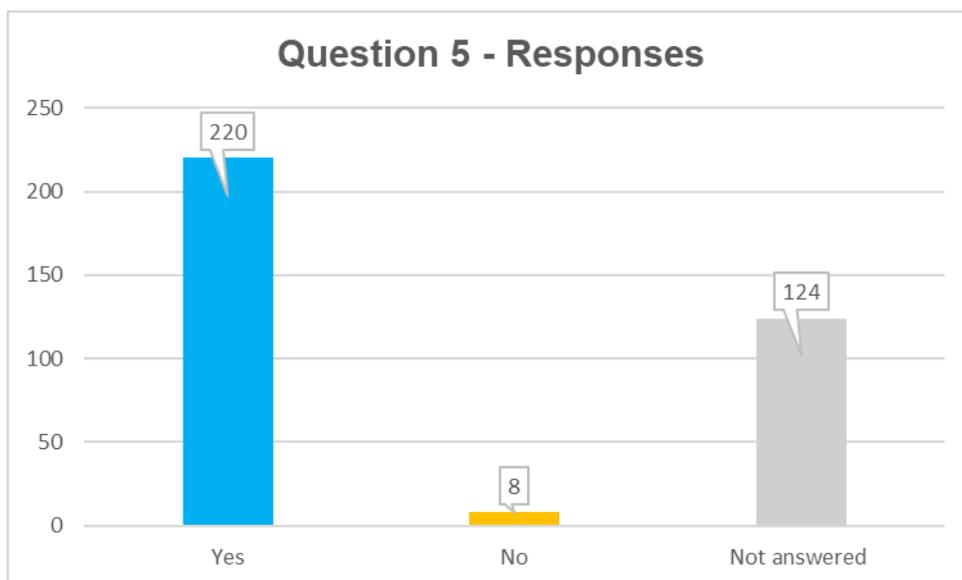


Question 4: Which fee option do you prefer for the level 1/Basic disclosure? And why?

- Option 2 is more cost effective for individuals applying for multiple disclosures
- Limited support for option 1 as more straightforward than option 2.
- Under option 2 it is unfair for one employer to pay for the initial disclosure as they may not benefit from later reduction in price



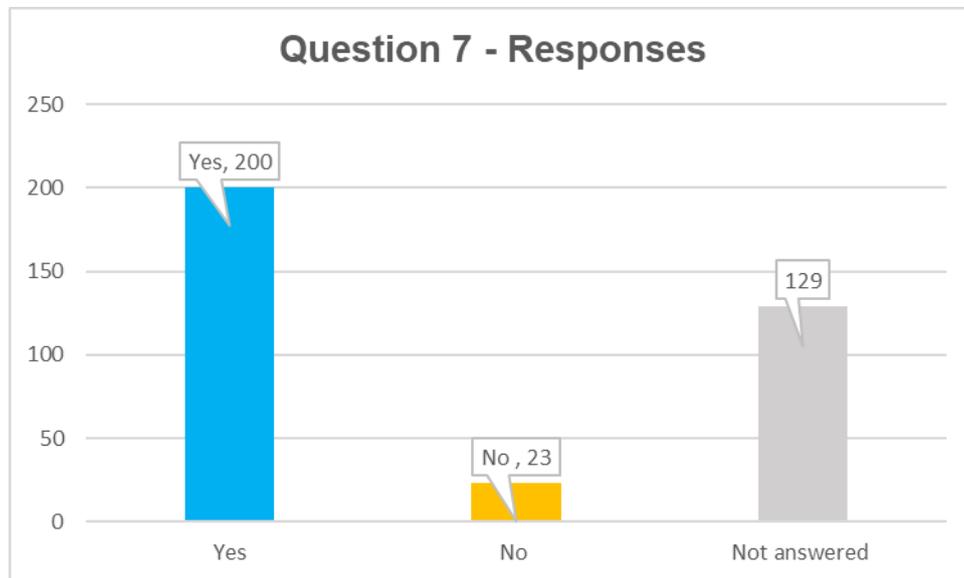
Question 5: Do you agree that it is appropriate to regulate registered bodies in relation to B2B applications?



Question 6: What impacts, if any, do you foresee from moving from a paper based system to a digital system?

- 264 responses to this question
- Need to consider accessibility
- Not having paper option would have negative equality impact
- Quicker turnaround times
- Reduced paper usage
- Greater ownership of information placed on individual

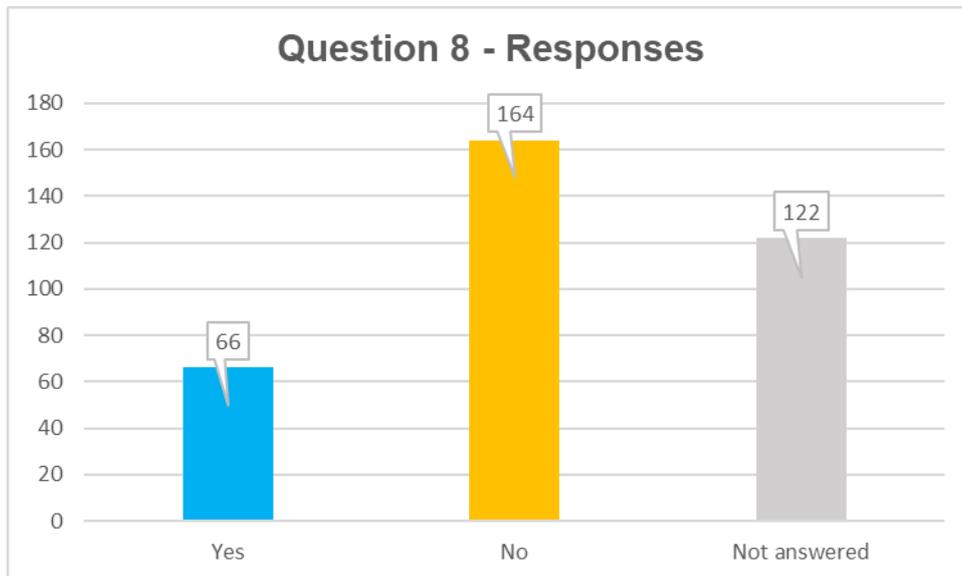
Questions 7: Do you agree with our proposed fee for the apostille service?



Question 7a: If not, what do you think the fee should be?

- 38 responses to this question
- Alternatives suggested were: free, £5

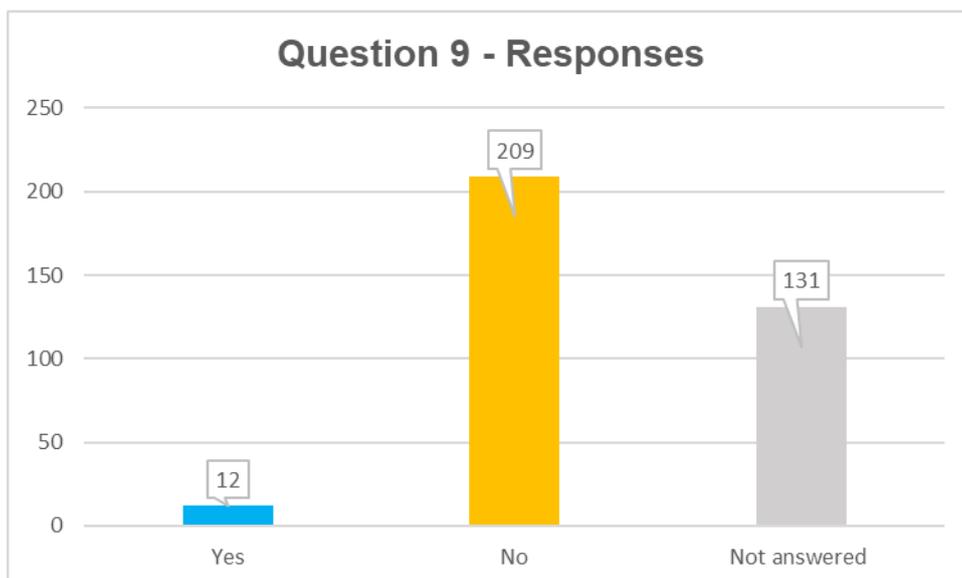
Question 8: Are there any professions/roles for the Level 2 disclosure that are not included that should be on the list?



Question 8a: If you have said yes, please note what these are.

- 96 responses
- Broadly from areas in which individuals are not eligible for PVG membership, but where contact with children or vulnerable adults may result from the provision of services and advocacy.

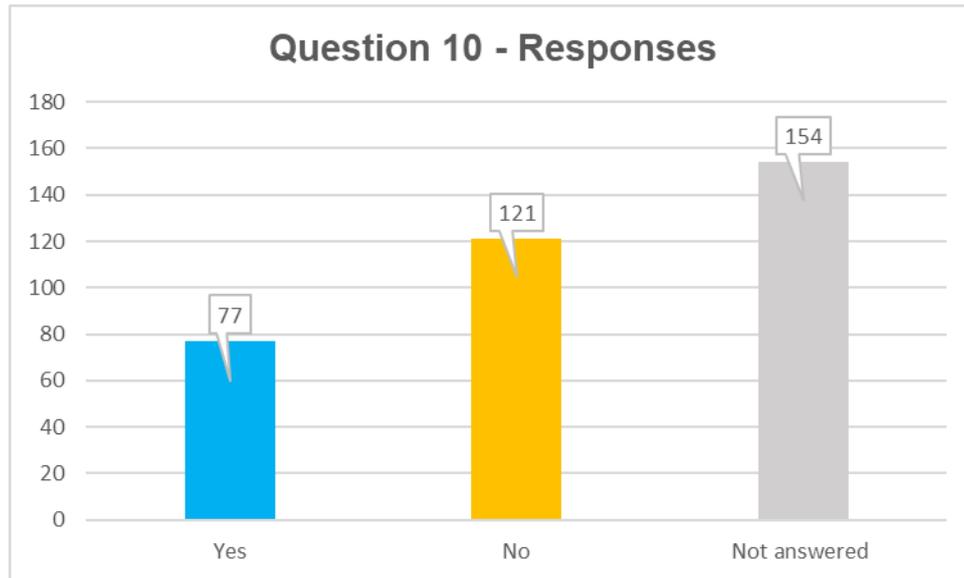
Question 9: Are there any professions/roles you think should be removed from the list?



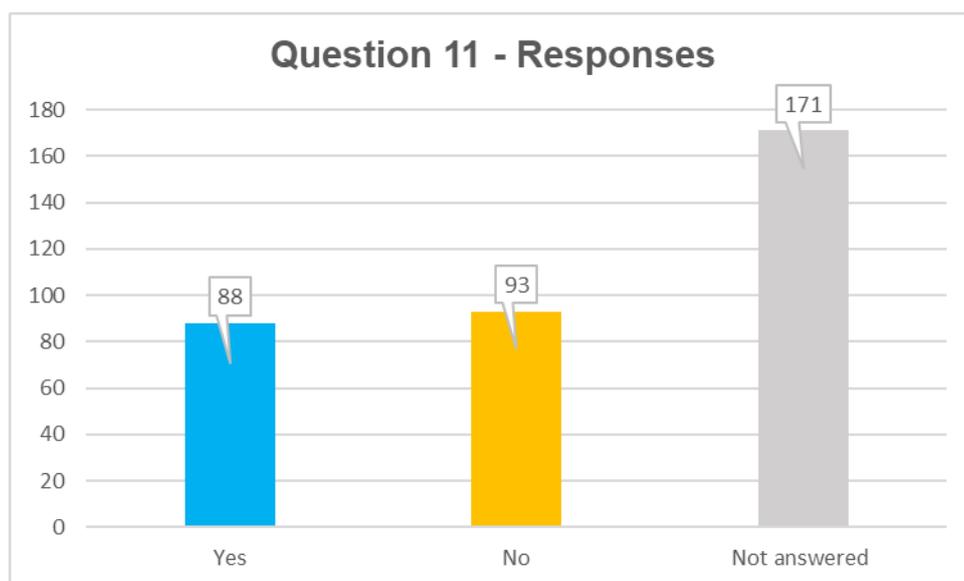
Question 9a: If you have said yes, please note what these are

- 22 responses to this question, primarily suggesting that some should be moved from this list to the list of protected roles.

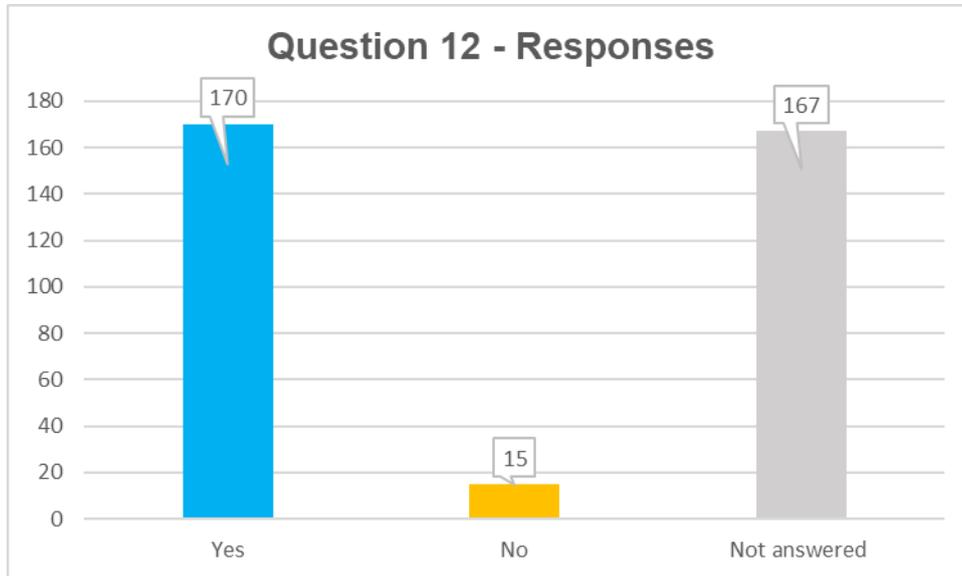
Question 10: Do you agree with the proposal to remove certain kinship carers and all foster carers from a membership scheme?



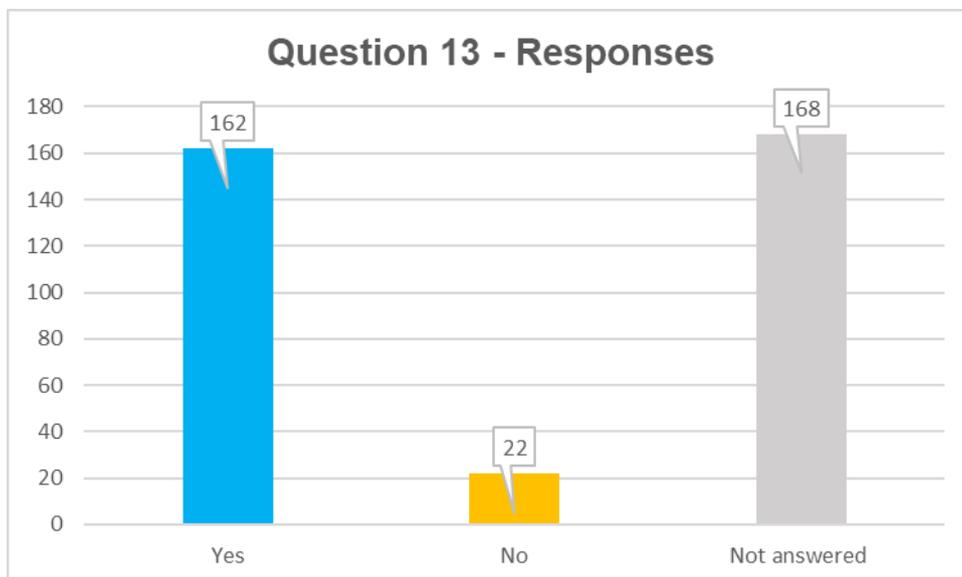
Question 11: Do you think that the two types of kinship arrangements should continue to be treated differently under the future arrangements?



Question 12: Do you agree with this proposal that any member of the fostering/kinship household aged over 16 will require a level 2 check?



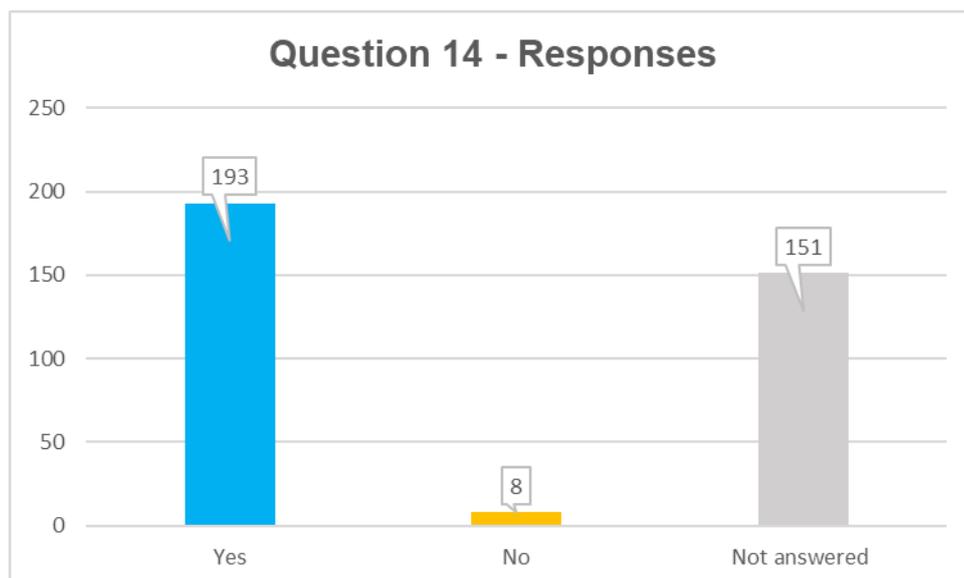
Question 13: Do you agree with the proposal that a level 2 check should be undertaken by anyone in the foster/kinship carers network who supervises the children?



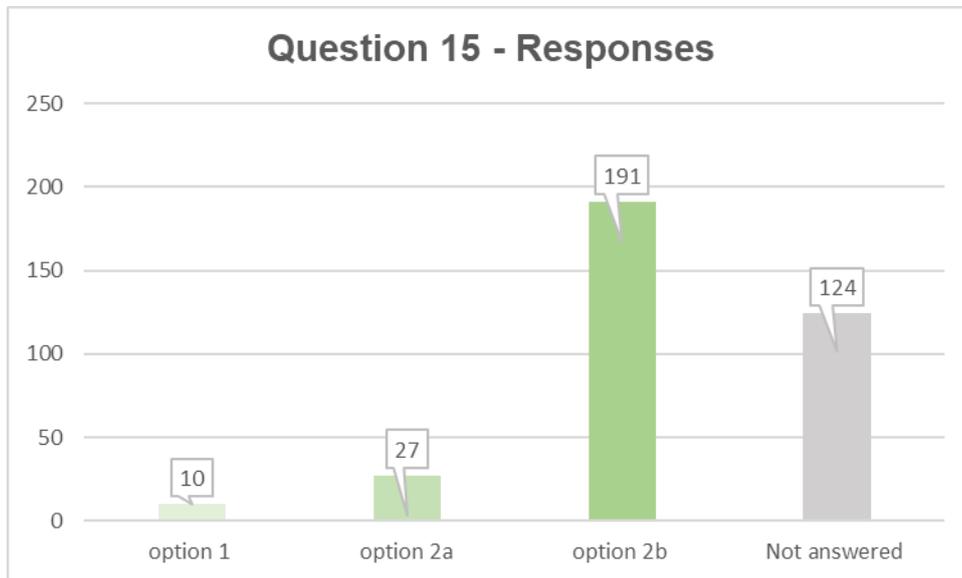
Question 13a: Do you think that anyone else in the foster/kinship carer’s network needs to be checked? If so, who and why?

- 74 responses to this question
- Suggested anyone with unsupervised / regular contact with the child should be checked
- Said we should avoid those under foster or kinship arrangements being treated differently for their peers
- The proposal fails to uphold articles under the UNCRC on freedom of association, right to privacy and leisure, play and culture

Question 14: It is currently not possible for individuals over the age of 16 residing in a residential school setting (for example, spouses of house parents), but who do not have specific responsibilities, to obtain an enhanced disclosure. We believe that they should be subject to a Level 2 disclosure, do you believe that this is the correct approach going forward?



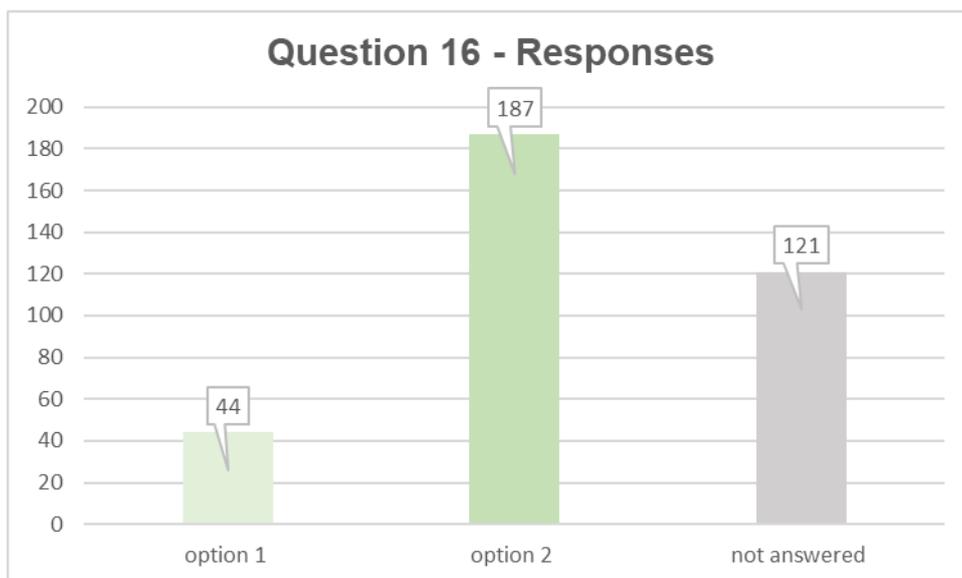
Question 15: Which option should be the content of the Level 2 disclosure product be based upon? Please provide the reason for your choice.



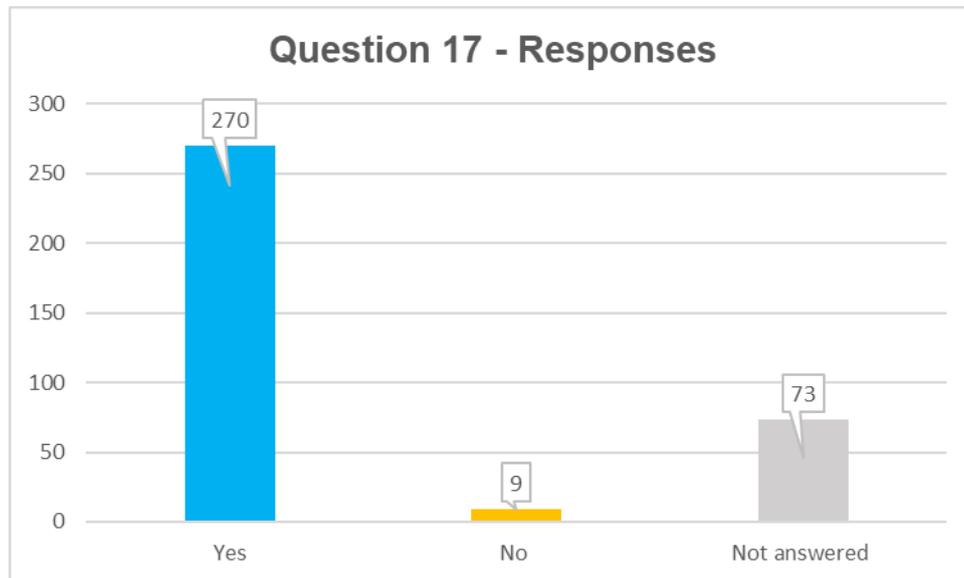
Reasons given included:

- Option 2b: provides the most information for recruitment decisions
- Option 2a: middle ground not including information irrelevant or inappropriate for the role
- Option 1: concerns over the use of ORI in the other options

Question 16: Which price option do you prefer for the Level 2 product?



Question 17: Is it proportionate that the free checks should continue for volunteers who obtain Level 2 disclosures?



Question 18: What issues, if any, do you foresee with a move to a digital service?

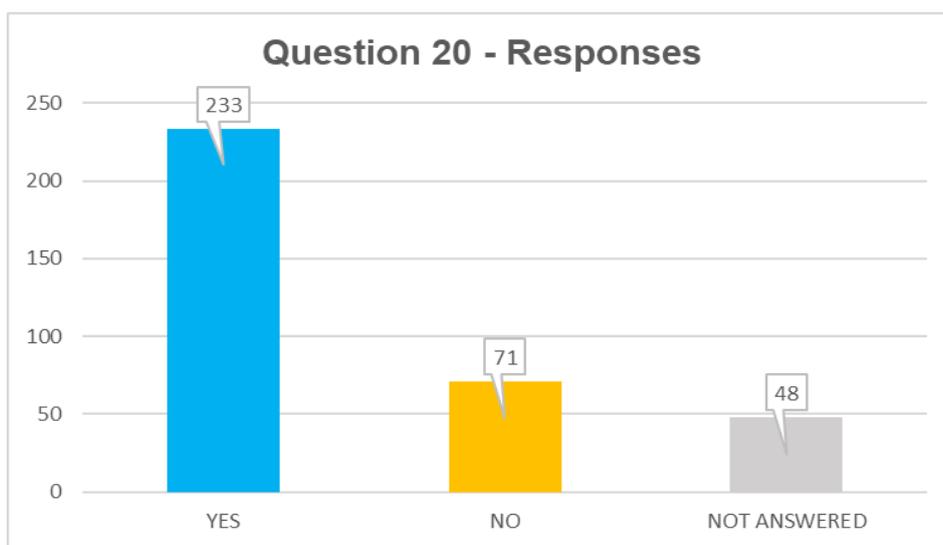
All points raised in relation to a digital service will be shared with the Disclosure Scotland Digital Transformation Team who, with input from policy colleagues and stakeholders, will be developing the digital services.

Section 3 – Reforming the policy underpinning the PVG Scheme

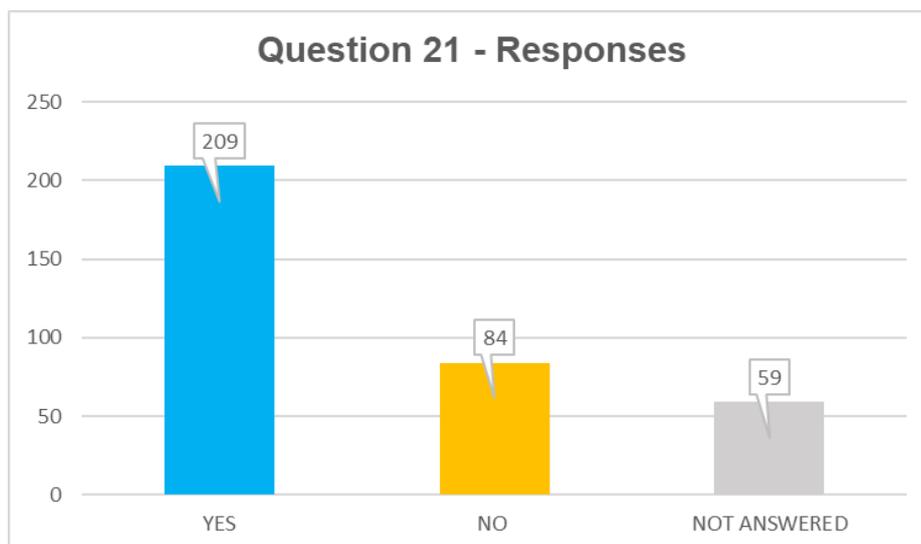
Question 19: How should a mandatory PVG Scheme be introduced and how should it work?

- Requires plenty of transition time with guidance and training
- Some suggested a phased introduction

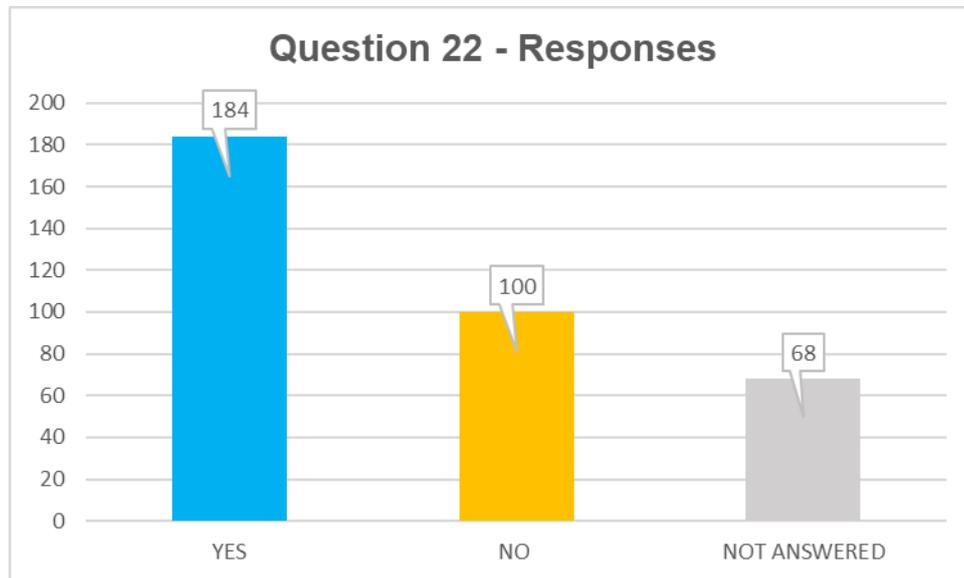
Question 20: Do you agree with the proposal to replace the “regulated work” definition with a list of roles/jobs?



Question 21: Do you foresee any challenges for organisations from this proposed approach?



Question 22: Are there any roles/jobs not within the list in Annex B that you think should be subject to mandatory PVG scheme membership?



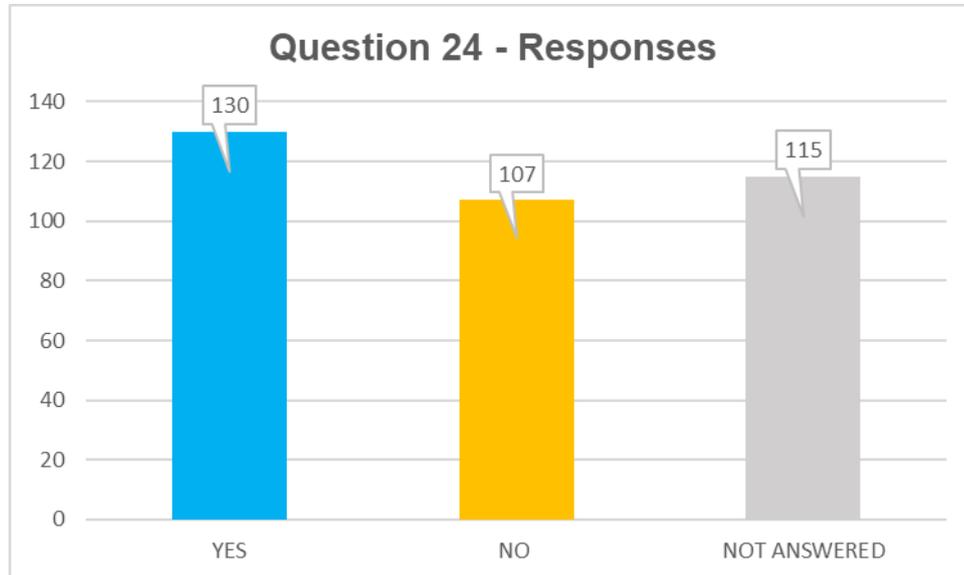
Question 22a: If so, please provide more detail on why.

There were over 500 roles not listed in Annex B suggested for inclusion in the list. These are listed at Annex D.

Question 23: To avoid inappropriate membership, what criteria to you think should be used to decide if an individual is in a protected role?

- What a person does in relation to another was viewed as the most important factor
- Other factors were where and how long someone was with a child or protected adult
- 'Fleeting' and 'indirect' were used to argue against scheme membership

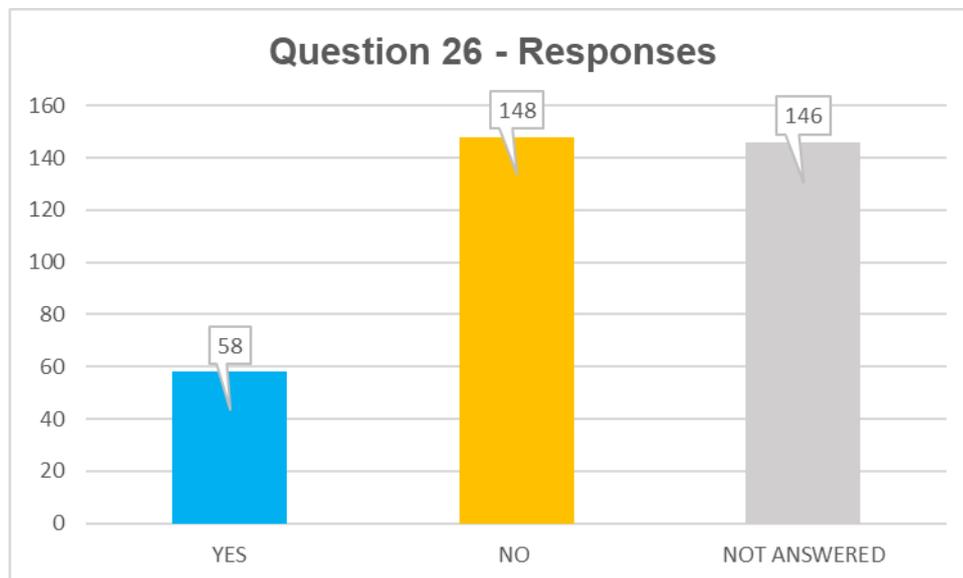
Question 24: Do you think that the decision about whether someone who is in a protected role meets an exception which makes them ineligible for the PVG Scheme should be taken by Scottish Ministers?



Question 25: Are there roles that would not be protected roles and therefore ineligible for membership to the new scheme, that should, however, be eligible for a level 2 disclosure?

- 158 responses.
- Administrative and support staff who have access to sensitive information on vulnerable groups
- Sports club presidents, treasurers and secretaries
- Family of foster carers

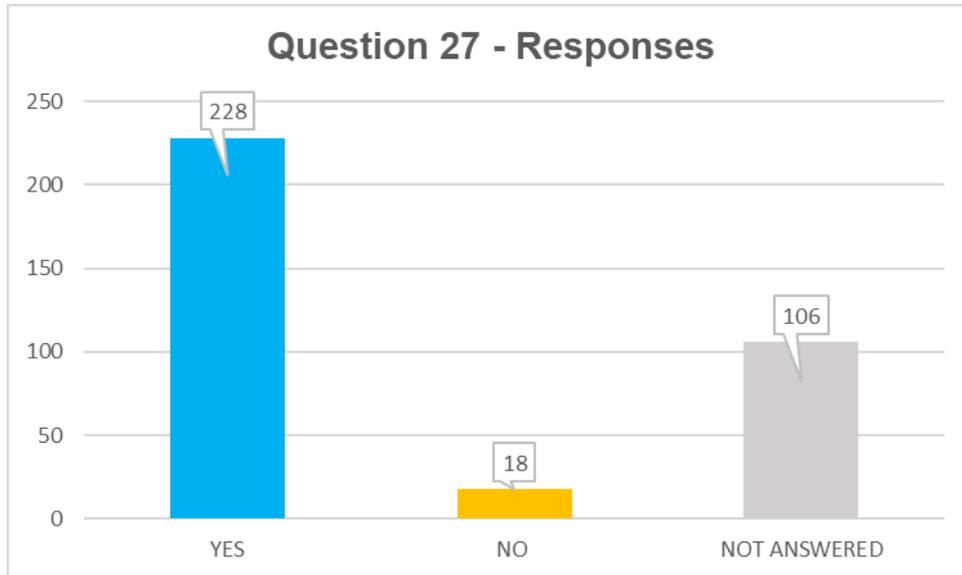
Question 26: Are there any welfare services that provide support to individuals with particular needs that should be added, or are there any services that should be removed?



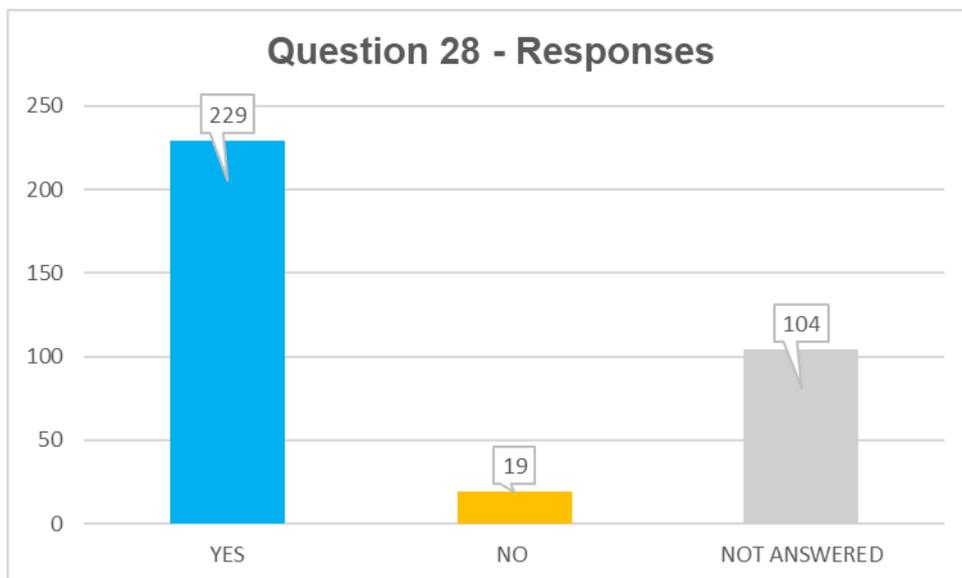
Question 26a: If yes, please state what these are

- Befriending
- Sport services linked with health and wellbeing outcomes
- Humanitarian aid

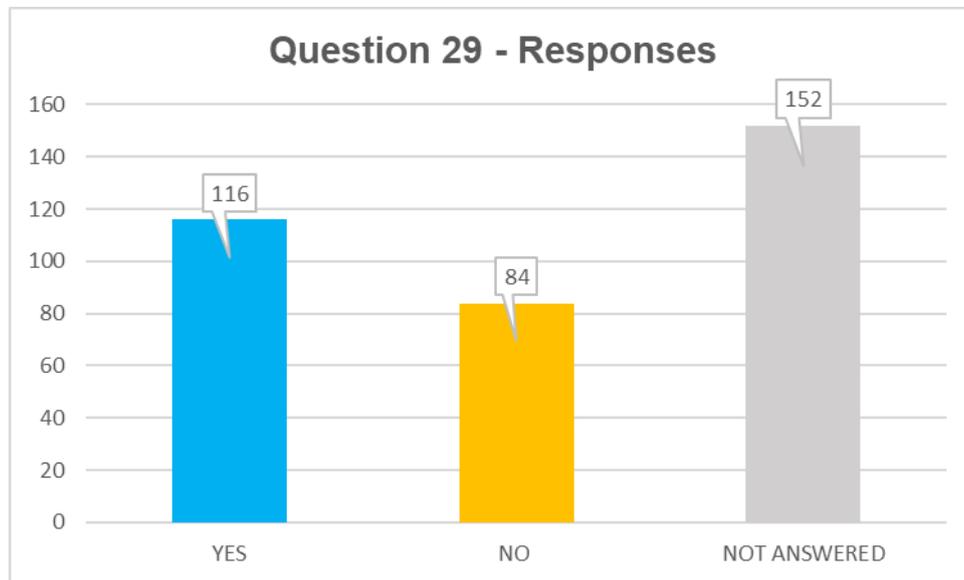
Question 27: At present, the front line member of staff or volunteer whose normal duties require them to carry out certain activities with an adult, such as ‘caring for’, means that staff member is doing regulated work. Is this appropriate?



Question 28: Should the immediate line manager of that member of staff is also able to become a scheme member?



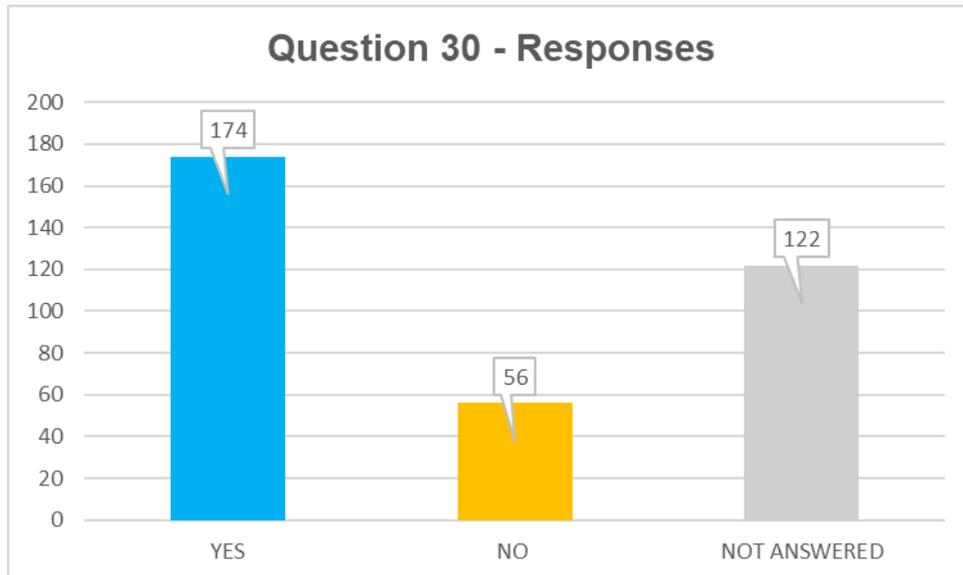
Question 29: Outwith the activities, a person can be doing regulated work with adults if they work in certain establishments, namely, a care home; or in residential establishment or accommodation for people aged 16 or over. Do you think these are the correct facilities, or should any be added or removed?



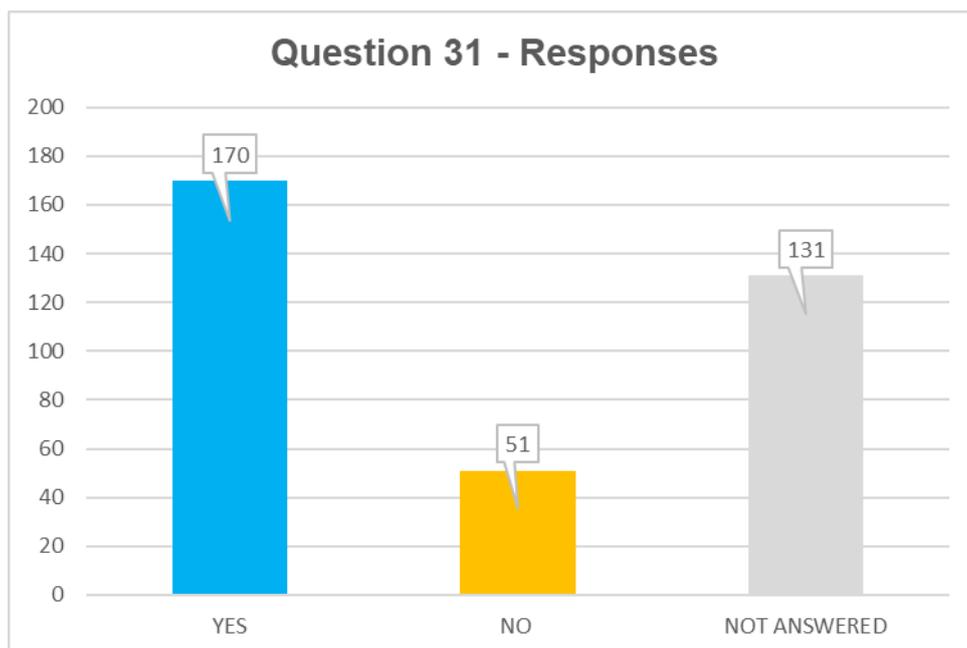
Question 29a: If yes, please state what these are

Some examples of the suggestions for inclusion were: community centres; sports and leisure facilities and venues; night shelters; secure hospitals; community hubs; and all establishments regulated by the Care Inspectorate.

Question 30: There are also certain exclusions that apply to work in such establishments. A person whose normal duties involve working in such a place will only be doing regulated work if doing something permitted by their position gives them unsupervised access to adults, and where that contact with the adults is not incidental. Do you think this approach is clear and helpful?



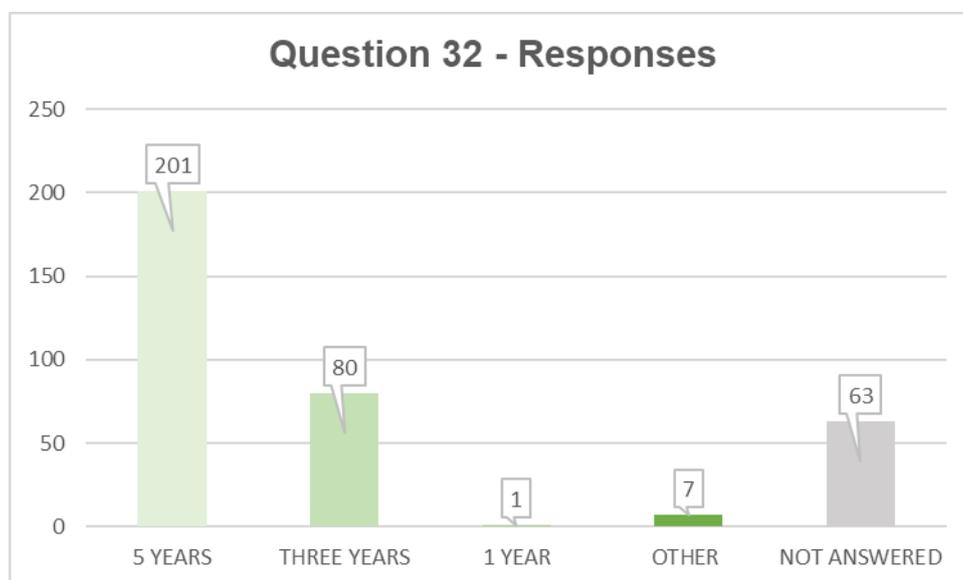
Question 31: The appointment of a person into certain positions in relation to services for adults means that membership of the PVG Scheme is possible. Do you think that list of positions is correct?



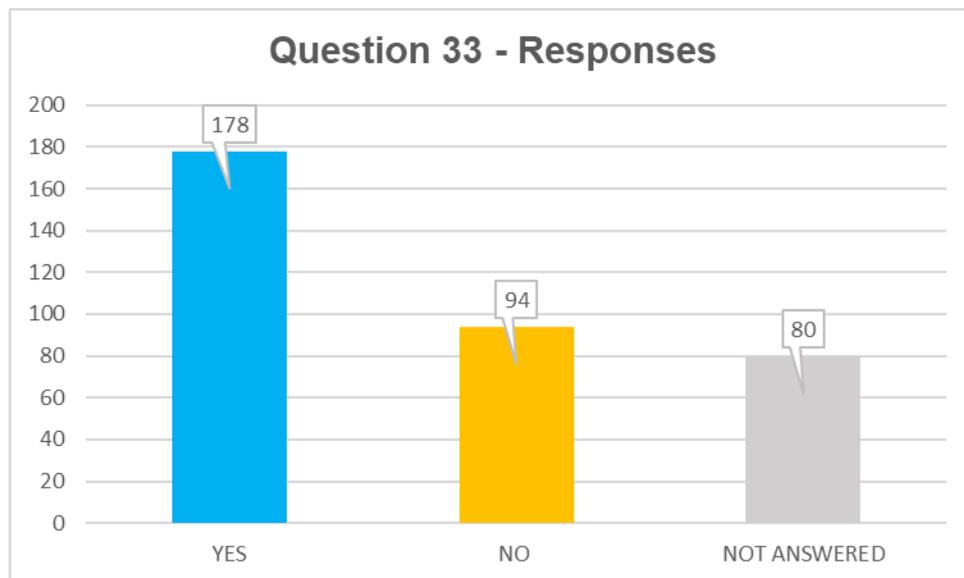
Question 31a: Should it be amended either by adding to it, or by taking away from it?

- Delivery of services are more complex now than when the 2007 Act was passed
- Council committee members, and charity trustees should be removed from the list
- Some argued for the inclusion of charity directors and officers and all local government councillors

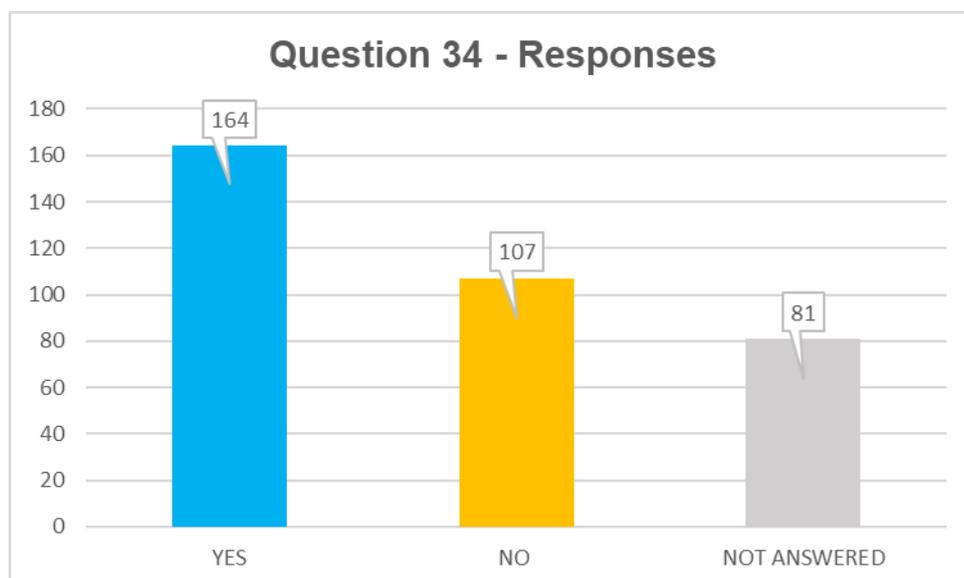
Question 32: How long should scheme membership last in a mandatory scheme?



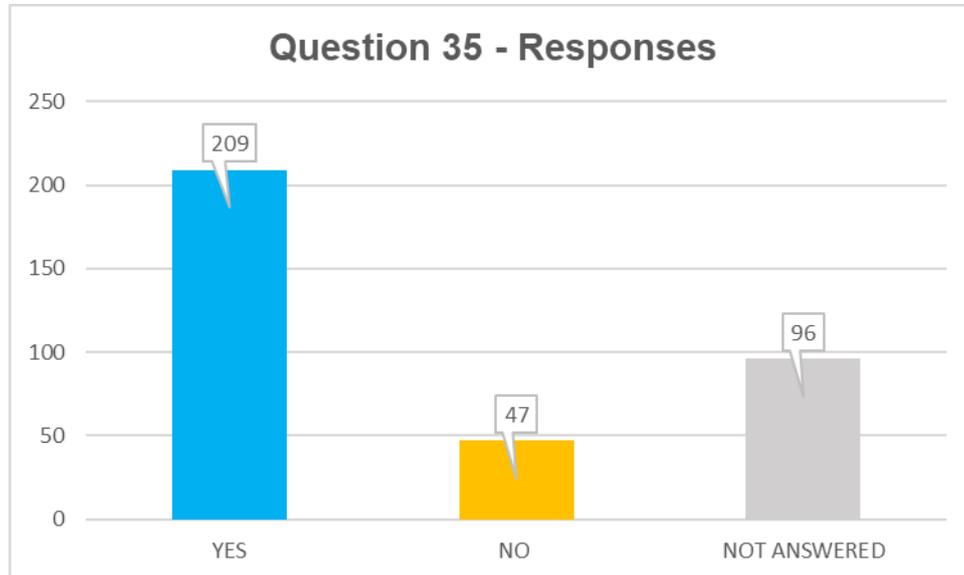
Question 33: Do you think a membership card would be beneficial to you as a member of the PVG scheme?



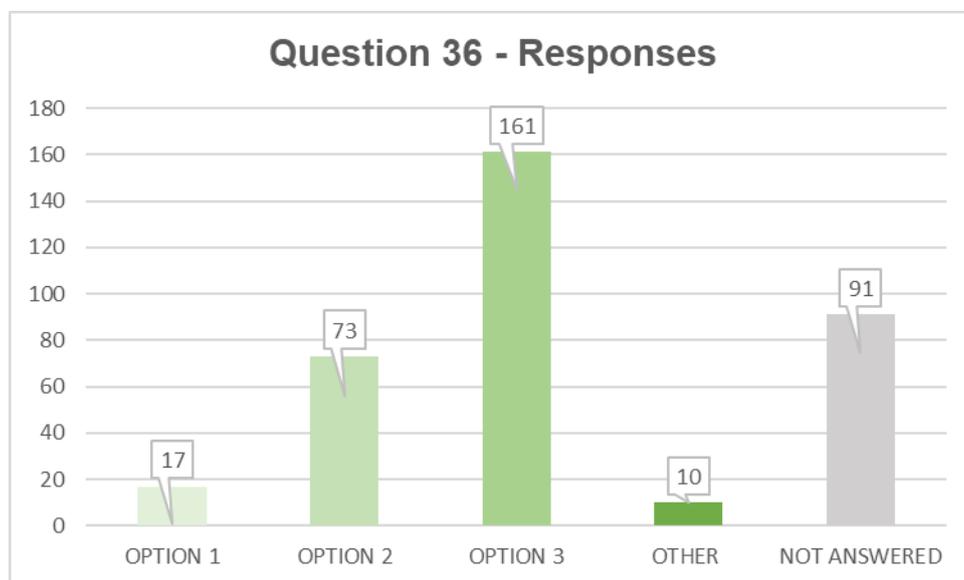
Question 34: Do you think a membership card would be beneficial to you as an employer?



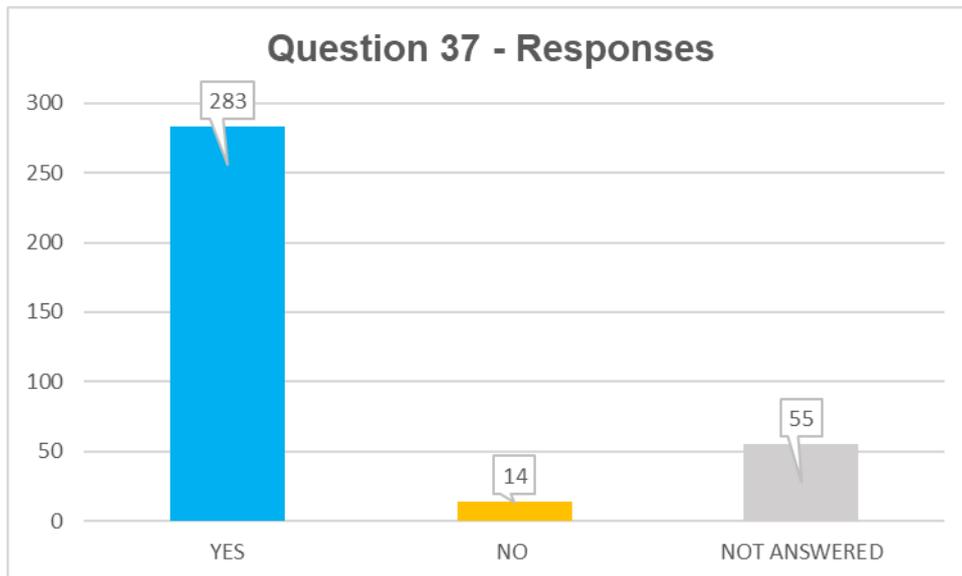
Question 35: Do you agree with the proposals to review the conditions for registered bodies as set out in the Code of Practice and Police Act 1997 and to develop a scheme that can be delivered digitally, that includes registered body duties where possible?



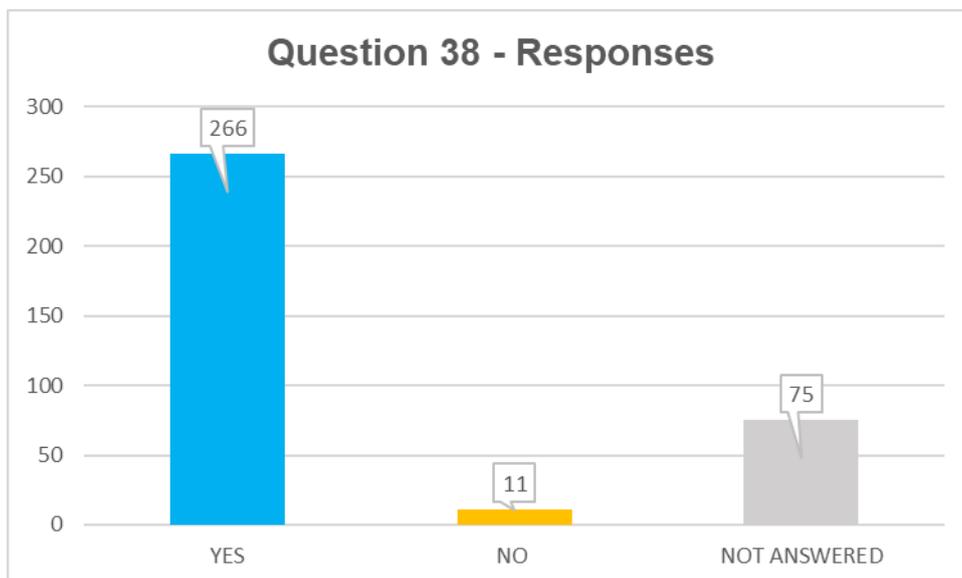
Question 36: What is your preferred option for membership and costs for PVG level disclosure?



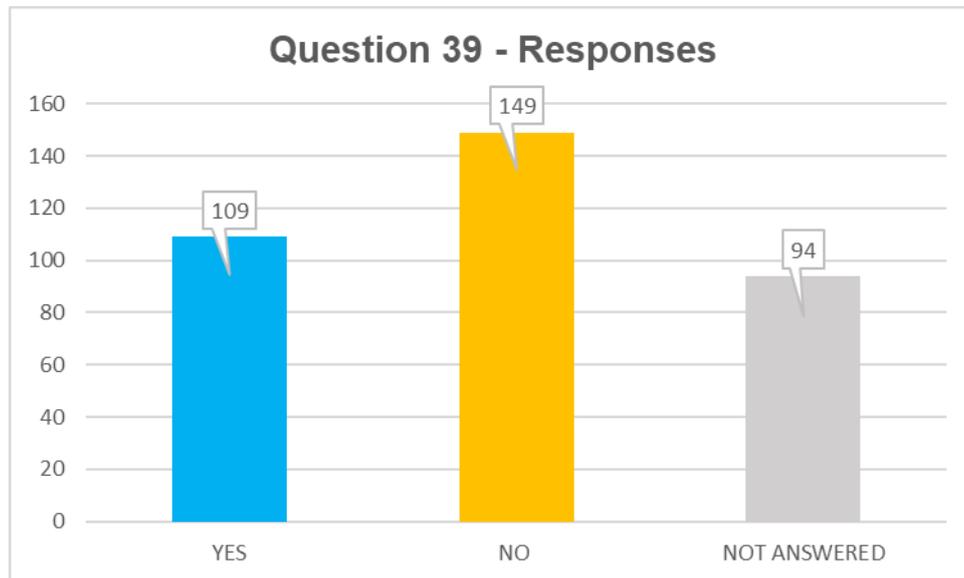
Question 37: Are you in favour of being able to interact with Disclosure Scotland online to manage PVG scheme membership?



Question 38: Are you in favour of using electronic payment method for fees?



Question 39: Do you have an electronic payment method that you prefer?



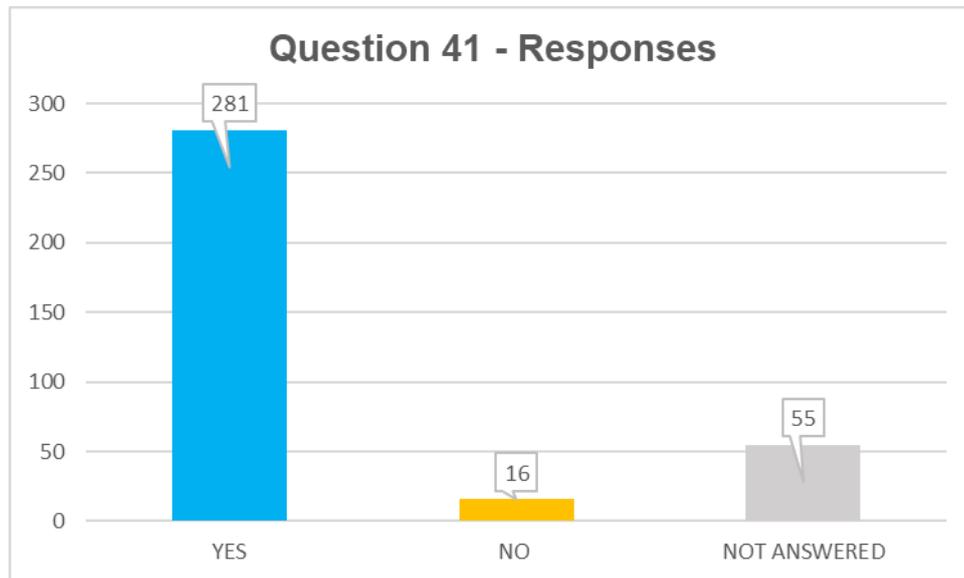
Question 39a: If you have answered 'yes' please say what it is:

- BACS and other bank transfers
- Credit/debit card
- Easibuy
- Invoice (Though some opposed as it slows the process)
- PayPal
- Sage worldwide
- Standing order/direct debit

Question 40: Do you have any proposals on how the transitional arrangements for moving away from a life-time scheme membership should work?

- Guidance and training needed
- Advance notice, information regarding how it will happen and time to administrate
- Clarity on protected roles so employers can see who needs to be a member

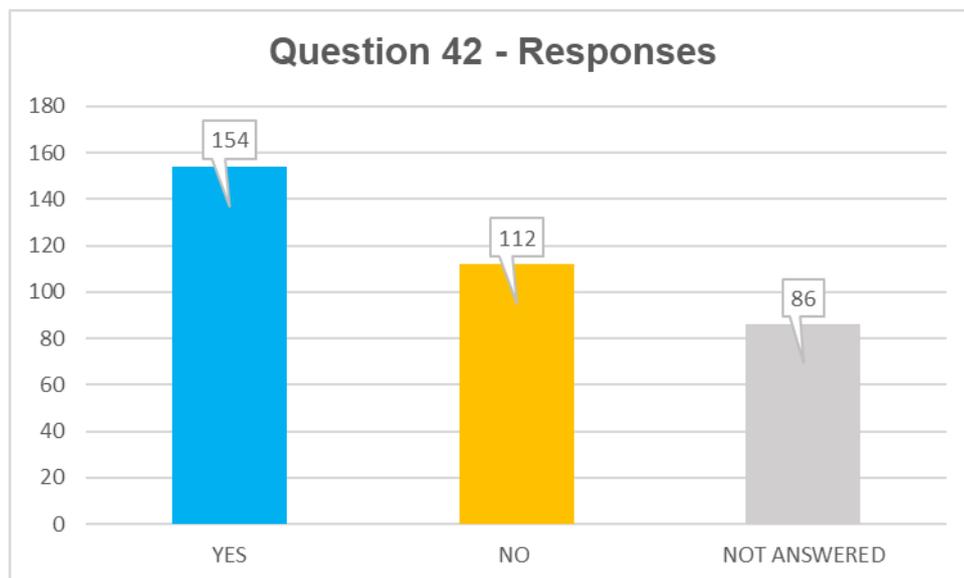
Question 41: Should volunteers continue to receive free membership?



Question 41a: If no, should they be subject to a reduced fee?

The importance of volunteering to Scotland was highlighted, and fees could be seen to be a barrier. If there is to be a fee, there was strong support from those who replied that it should be at a reduced rate.

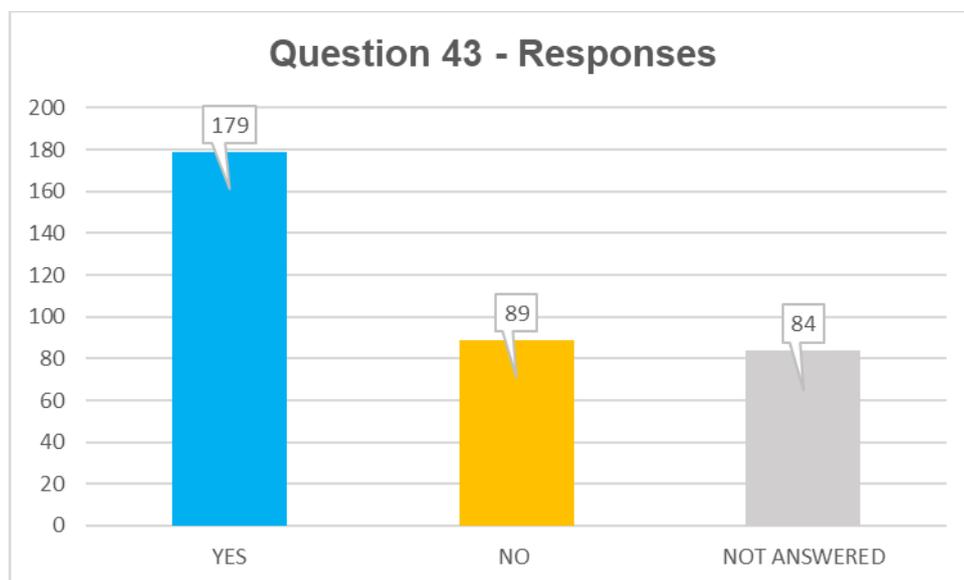
Question 42: Do you agree that voluntary organisations seeking to benefit from a reduced fee or the fee waiver should be subject to a public interest test?



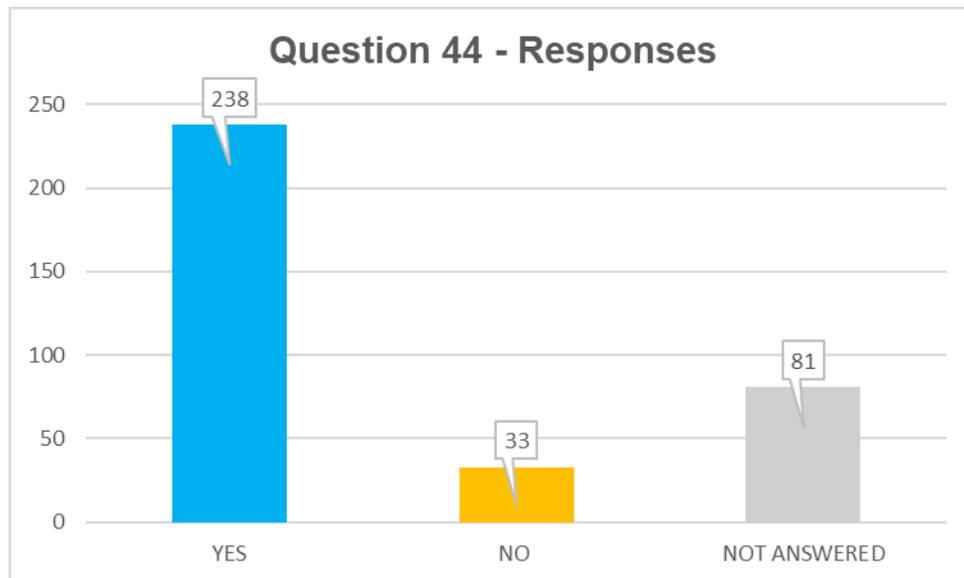
Question 42a: If so, how should that test be defined?

- Simple as possible
- Citing OSCR number
- Evidence of the public benefit the organisation provided

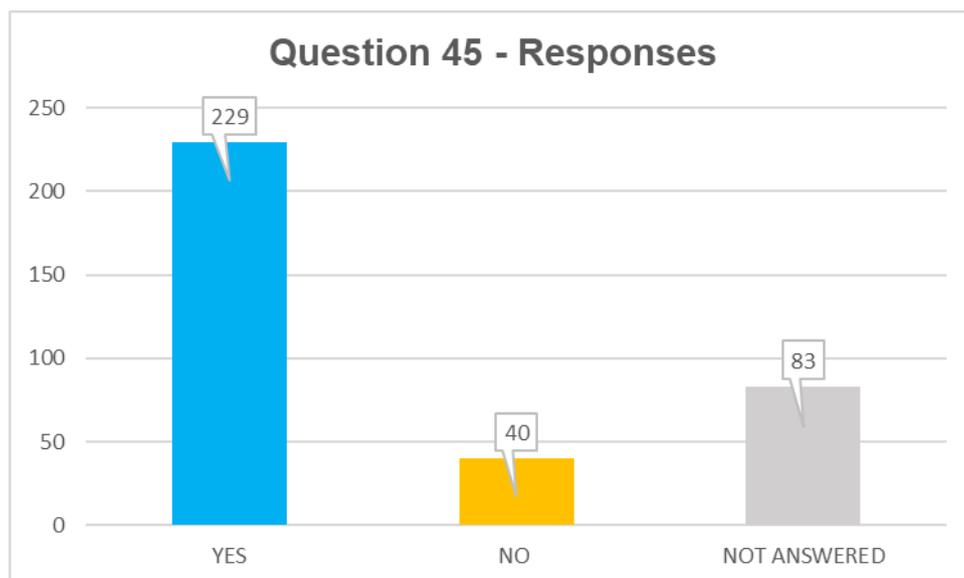
Question 43: Do you agree that employees and employers alike (including volunteers and volunteering bodies) who work or allow an individual to work in protected roles without joining the PVG Scheme or to stay in protected roles after membership has expired should be subject to criminal prosecution?



Question 44: Do you agree that any scheme member who fails to pay the relevant fee to renew their PVG Scheme membership and where there are no employers (or volunteering bodies) registered as having an interest in them in a protected role should exit the PVG Scheme automatically at the expiry of their membership?

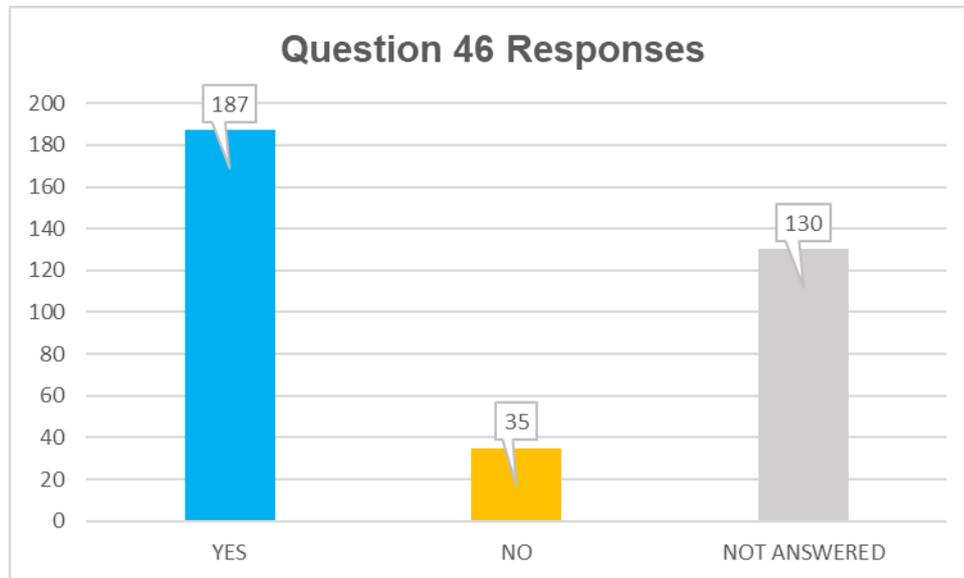


Question 45: Should a person who joined the Scheme as a volunteer and benefitted from free entry later try and register a paying employer against their volunteer membership then the full fee would become payable and a new 5 years of membership would commence. Do you agree with this?

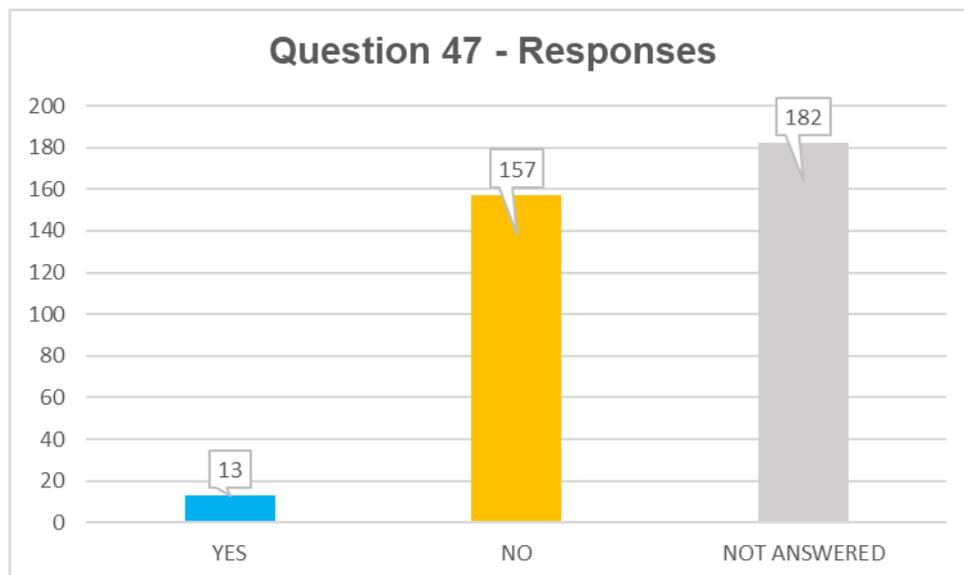


Section 4 – Removing unsuitable people from work with vulnerable groups

Question 46: Do you agree with our proposals to dispense with the current court referral procedure under section 7 of the 2007 Act?



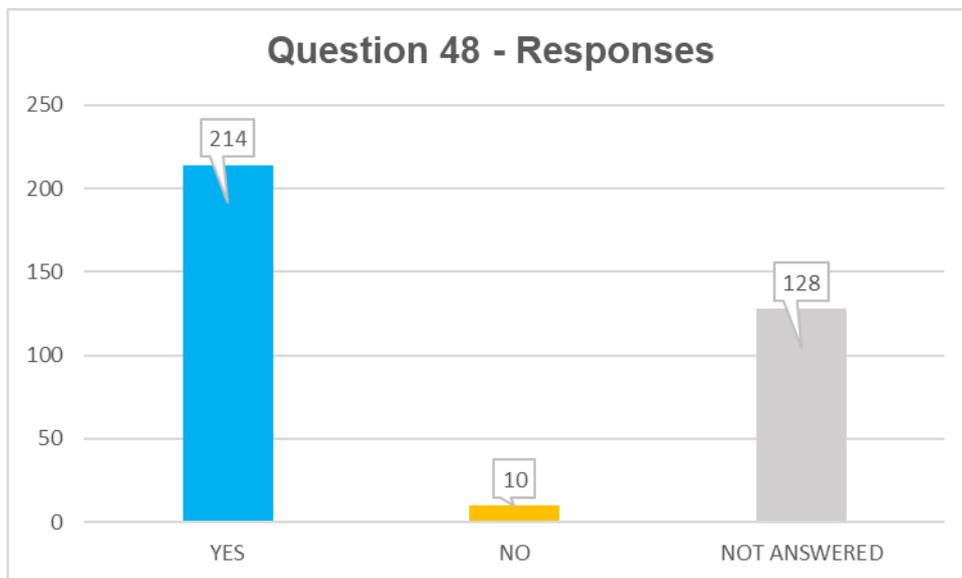
Question 47: Are there offences missing from the Automatic Listing Order that you think should be included?



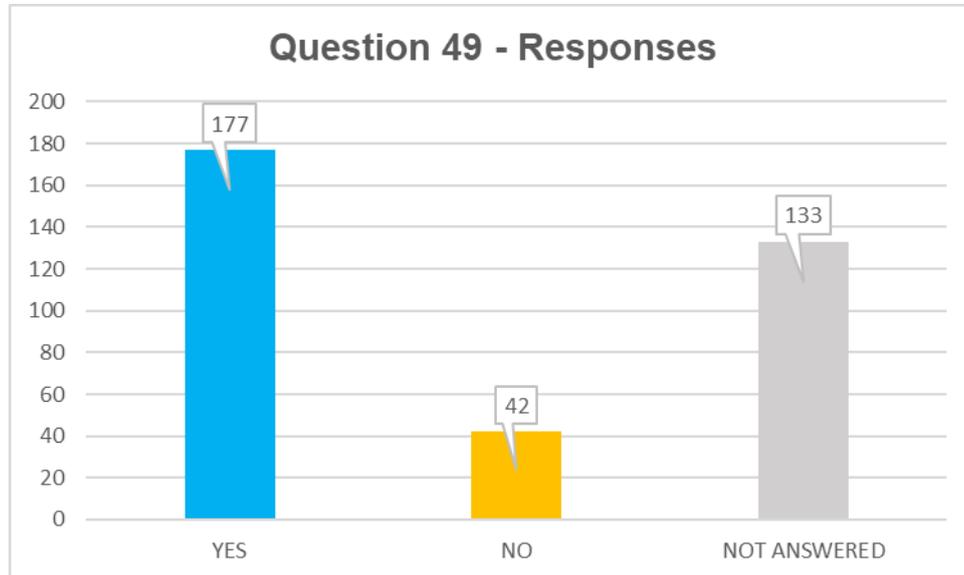
Question 47a: if you answered yes to question 47, please list the offences you believe are missing

- Common law offences such as theft, fraud, abduction and serious assault depending on severity
- Coercive domestic abuse
- Murder of anyone of any age

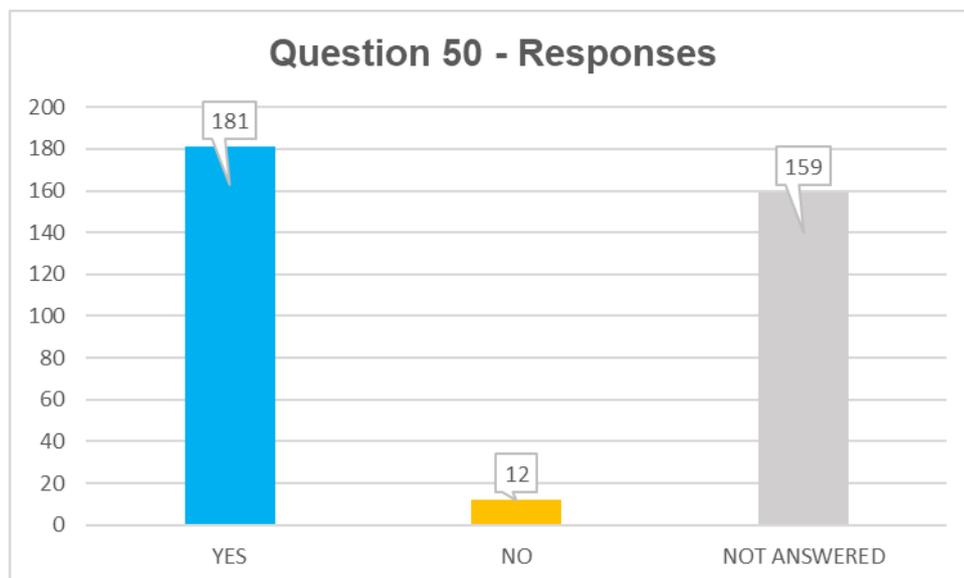
Question 48: Do you agree with proposals to create new referral powers for the Police?



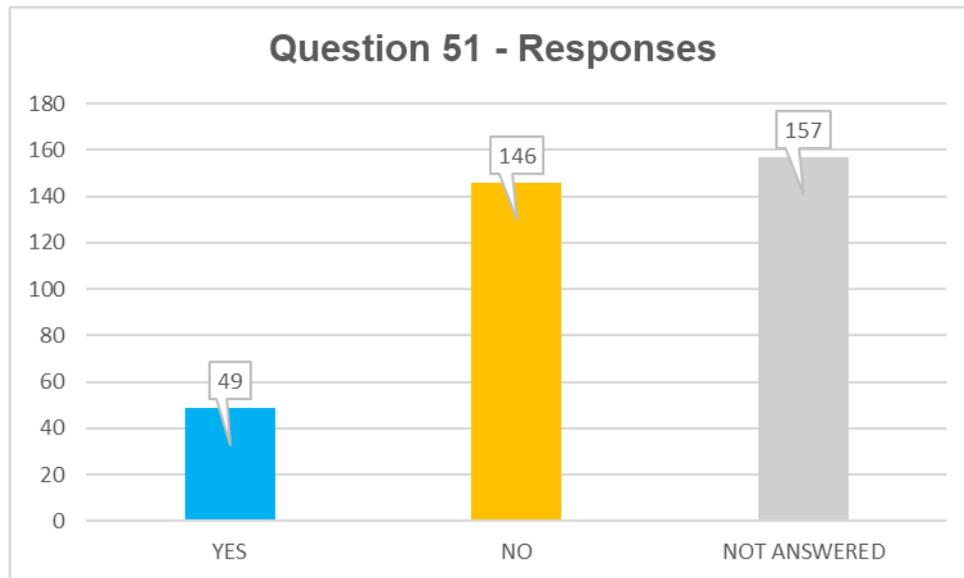
Question 49: Do you agree these powers should be limited to when police have charged a person with unlawfully doing a Protected Role whilst not a scheme member or where a referral has not been made by a relevant organisation?



Question 50: Do you think this proposal, to extent the powers of referral currently available to regulatory bodies to local authorities/health and social care partnerships, closes the safeguarding gap in terms of self-directed support?



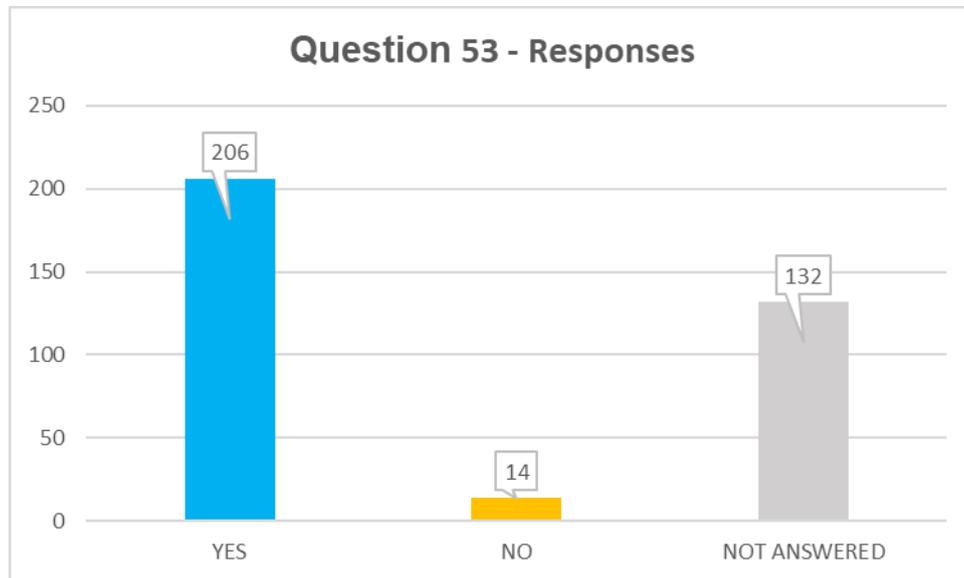
Question 51: Do you think that this list of regulatory organisations with powers to make referrals should be amended?



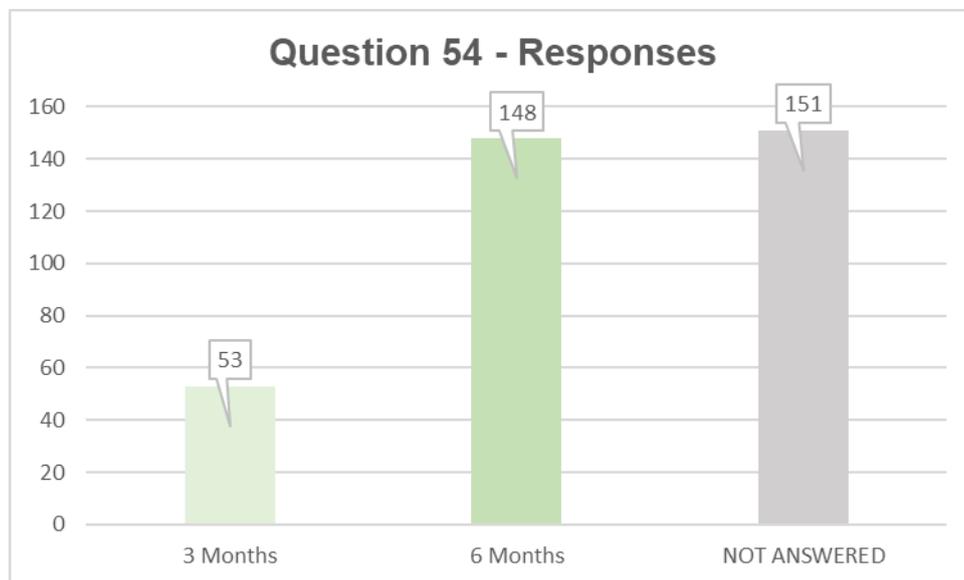
Question 52: If you think the list should be amended, please gives details of additions or removals.

- Organisation should be given full titles e.g. the registrar of the Health and Care Professions Council
- National and Scottish Governing Bodies of Sport
- Registrar of Independent Schools
- NHS Education for Scotland
- British Association for Counselling and Psychotherapy and Counselling & Psychotherapy in Scotland

Question 53: Do you agree with the proposal to provide Disclosure Scotland with powers to impose standard conditions on individuals under consideration for listing?



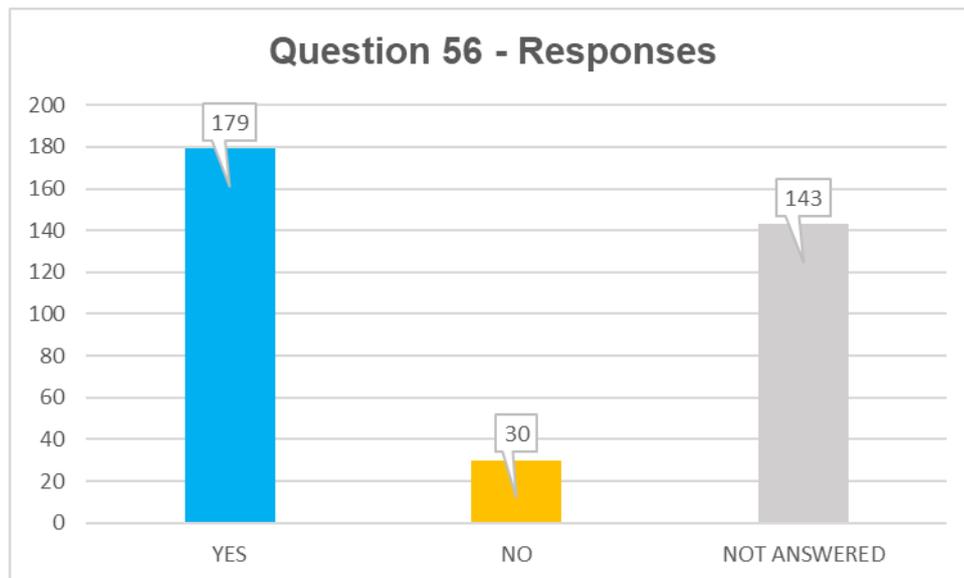
Question 54: If yes, how long should the conditions last before lapsing?



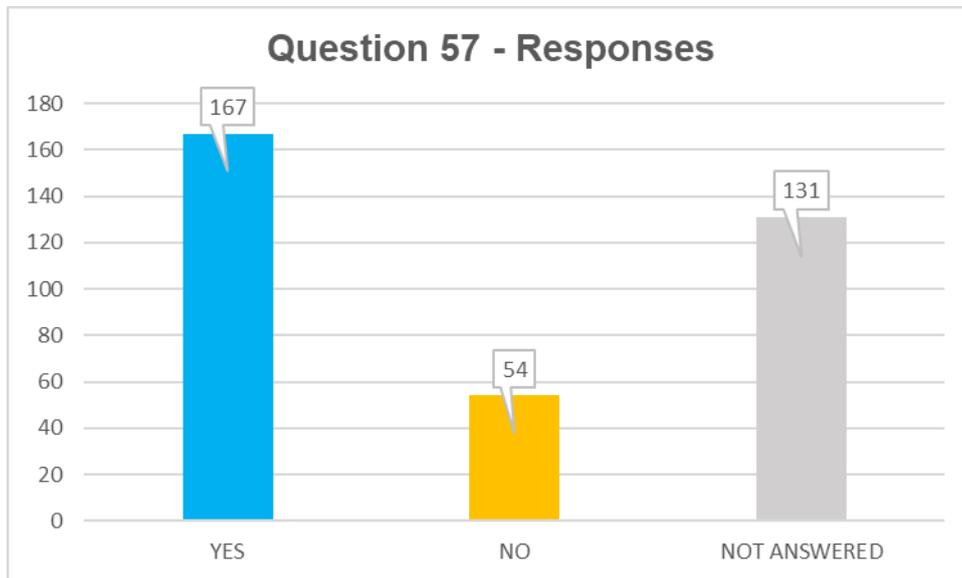
Question 55: Under what circumstances do you think Disclosure Scotland should be able to impose standard conditions and why?

- Rare and reserved for most extreme circumstances
- Need to balance proportionality with rights of the individual
- Serious misconduct
- Concerns around conditions based on alleged conduct
- Information should come from credible sources such as the Police
- Unnecessary bureaucracy and additional costs
- Alternative that Disclosure Scotland support employers to develop an action plan

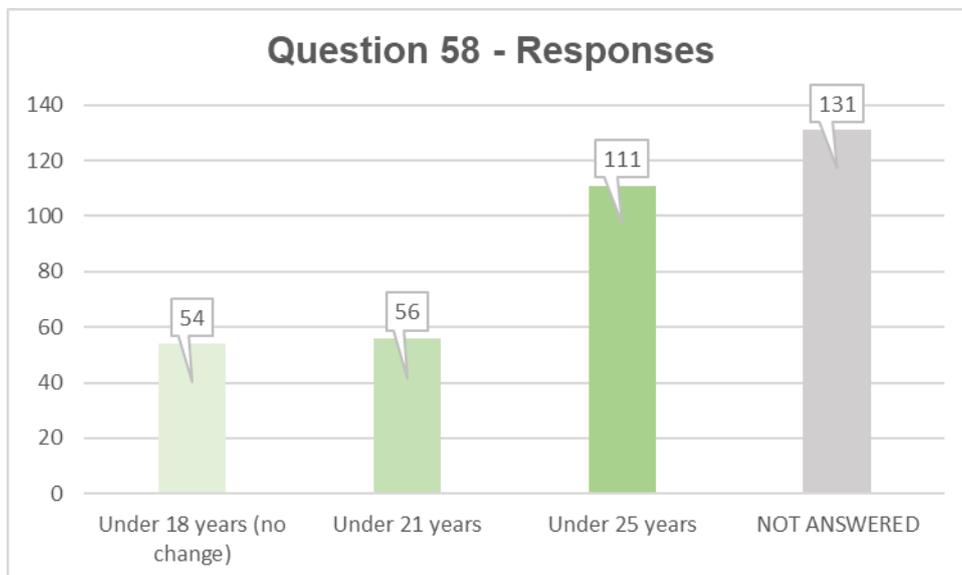
Question 56: Do you agree that it should be a criminal offence if an individual and employer/voluntary body failed to comply with standard conditions?



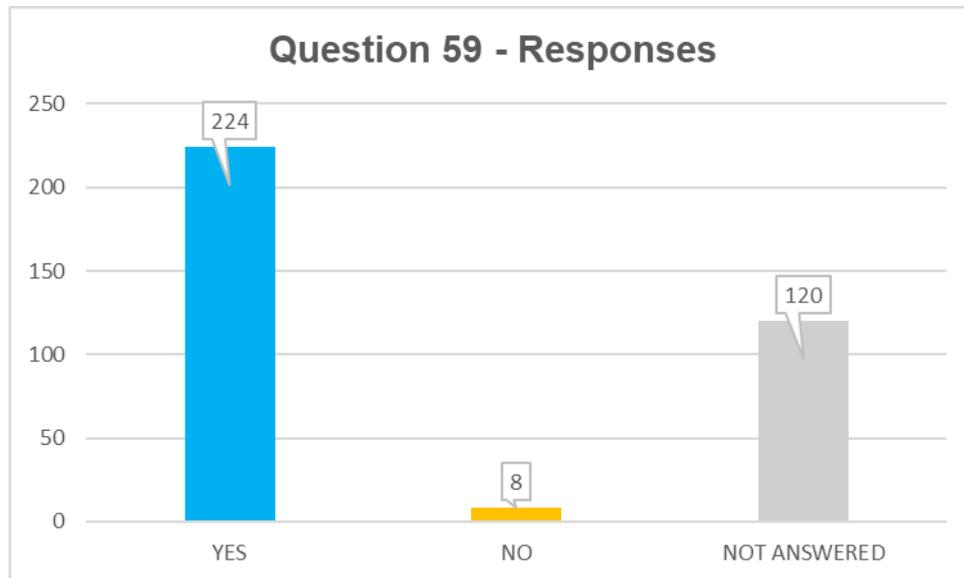
Question 57: Do you agree the age threshold for the shorter prescribed period for a removal application from inclusion on the list(s) to be made should be raised?



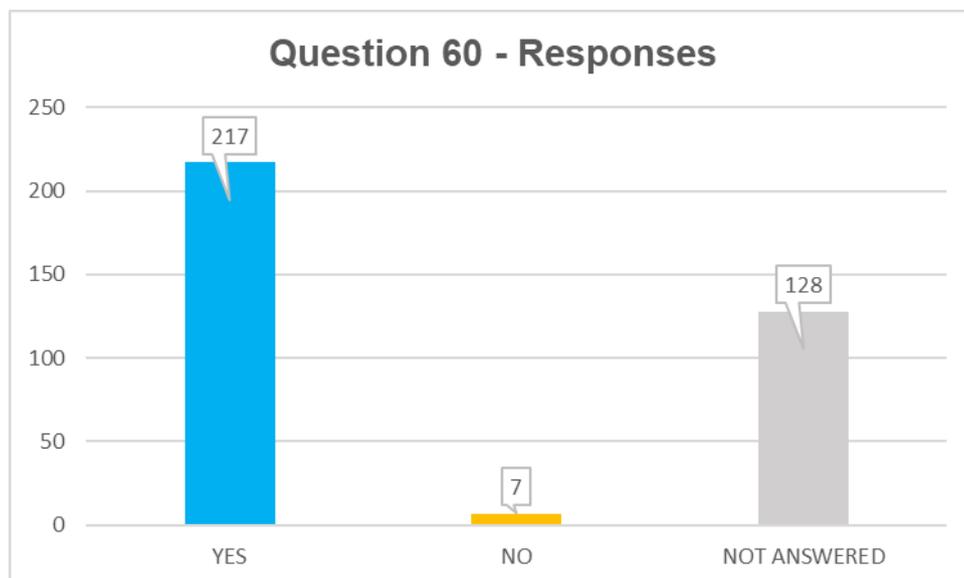
Question 58: Which option do you prefer?



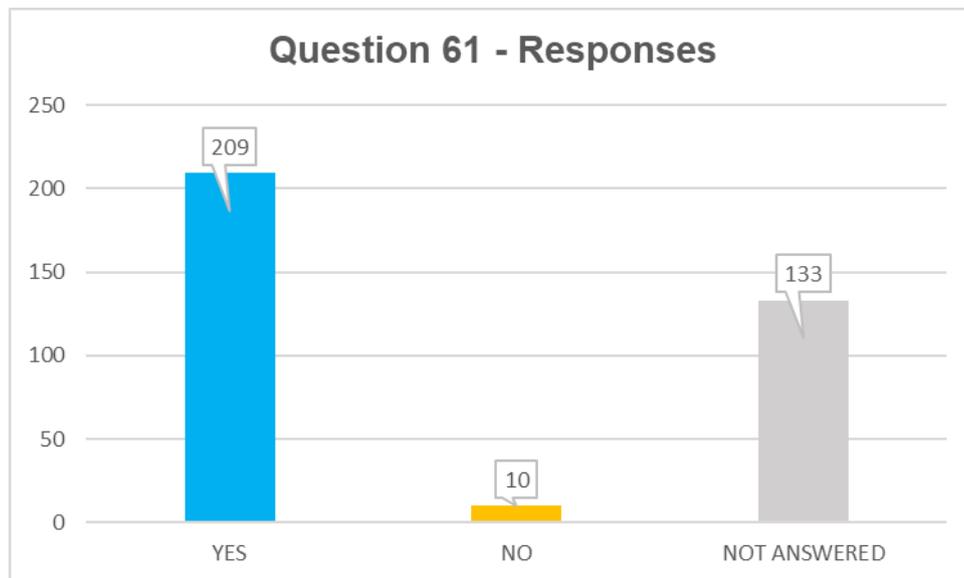
Question 59: Do you think it's appropriate that organisations, irrespective of where the regulated work is to be carried out, should be informed of a listed individual's barred status?



Question 60: Do you agree with our approach for PVG Scheme Members in a protected role overseas or organisations employing PVG members to do a protected role, such as providing aid services?

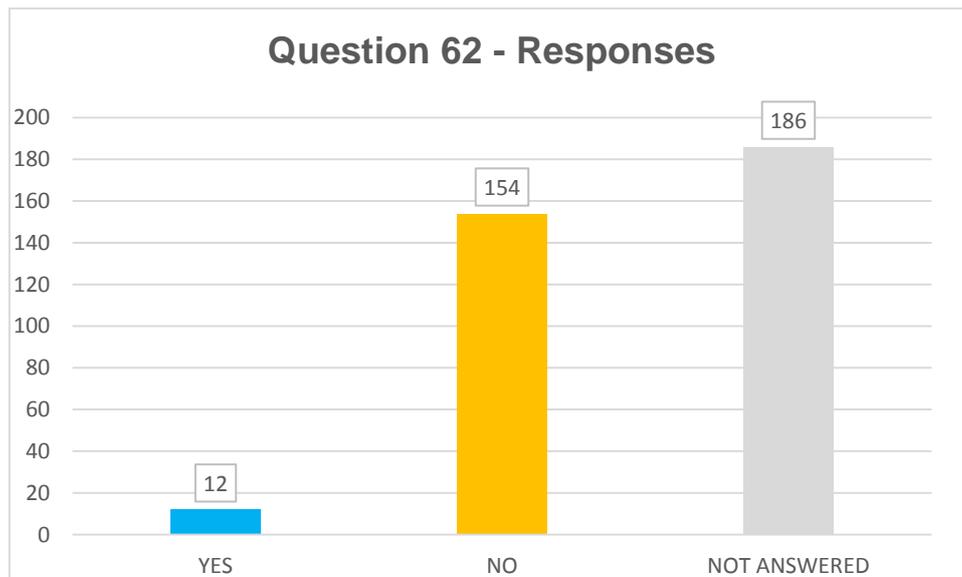


Question 61: We are proposing that there should be criminal offences in relation to organisations who employ barred persons overseas. Do you think that we should also consider introducing criminal offences in relation to barred individuals offering to undertake a protected role overseas?



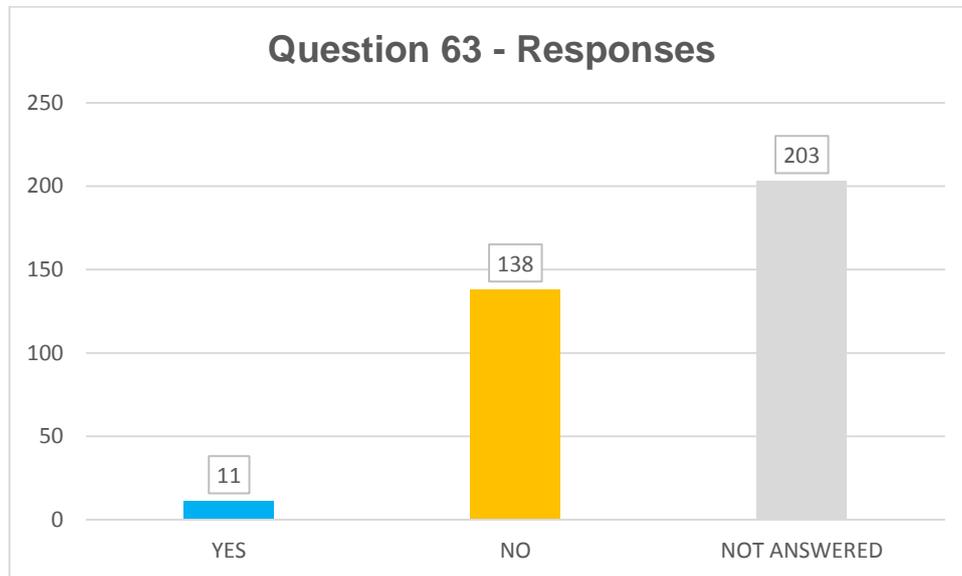
Section 5 - Offence lists and removal of spent convictions from a disclosure

Question 62: Are there any offences missing from either list, those being schedule 8A or schedule 8B, that you think should be included? If so what are they, on what list should they appear and why?



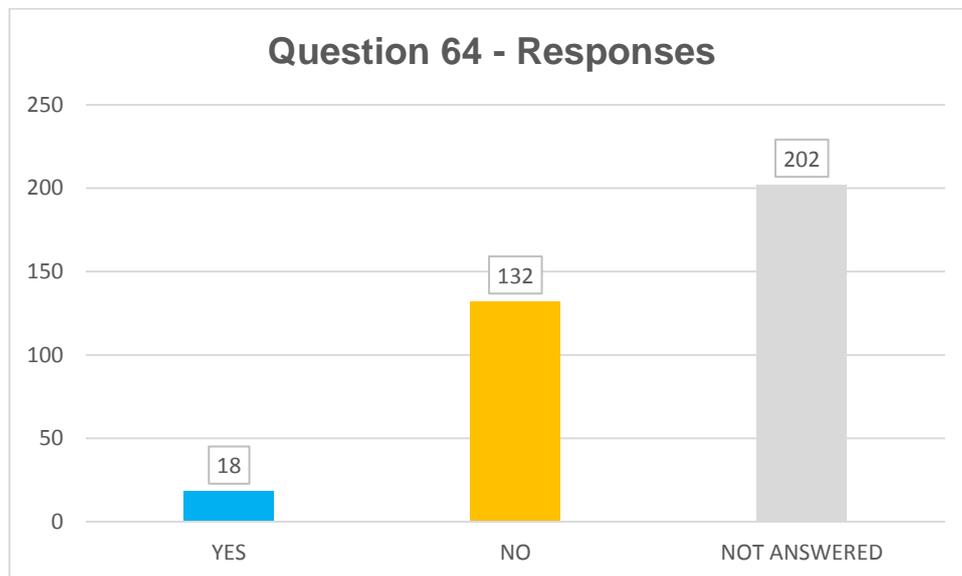
- Concerns raised regarding changing technology creating new offences
- All offences that result in the harm of a child should be included
- Domestic abuse or any offence with a domestic abuse aggravator
- Animal abuse or cruelty
- identity theft, tax offences and breaches of court orders should be included in 8B
- The use of the 8A and 8B lists could create conflict with the aims of rehabilitation
- All spent convictions should be removed from a disclosure unless the state makes a case to disclose it

Question 63: Are there any offences on schedule 8A that you think should be on schedule 8B? If so, please list them and explain why.



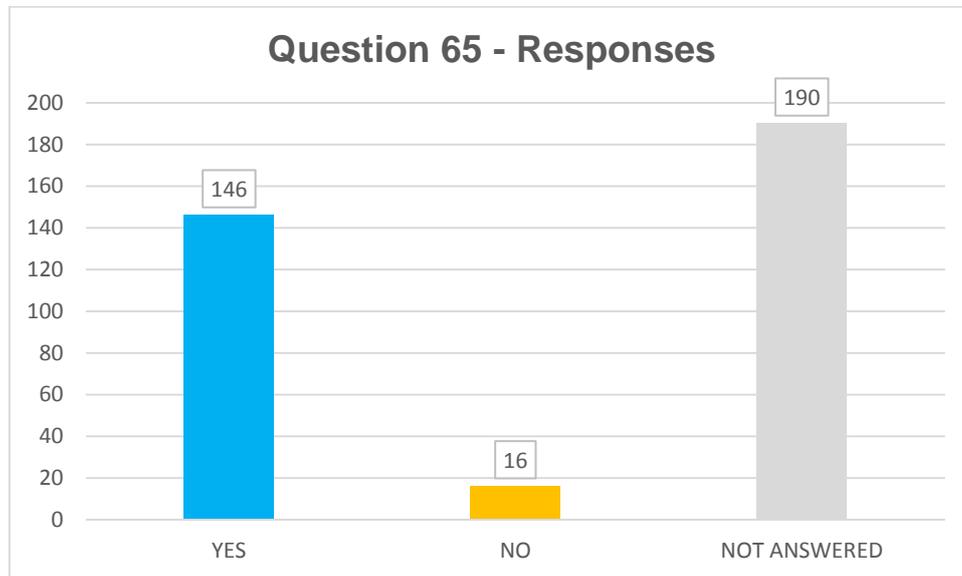
- Offences in relation to prostitution
- The default position should be non-disclosure unless the state makes a case to disclose
- Separate consideration should be given to offences committed by those under 18 years of age, with particular consideration given to care experienced children

Question 64: Are there any offences on schedule 8B that you think should be on schedule 8A? If so, please list them and explain why.



- Offences relating to psychoactive substances offences
- Domestic abuse or abuse behaviour or a domestic aggravator
- Sexual harm of a partner or ex-partner
- Offences that lead to the endangerment of a child
- Fireraising
- False accusations
- Adult protection
- Harassment
- Offensive weapons
- Obscene materials
- Offences related to dishonesty or violence
- Forced marriages

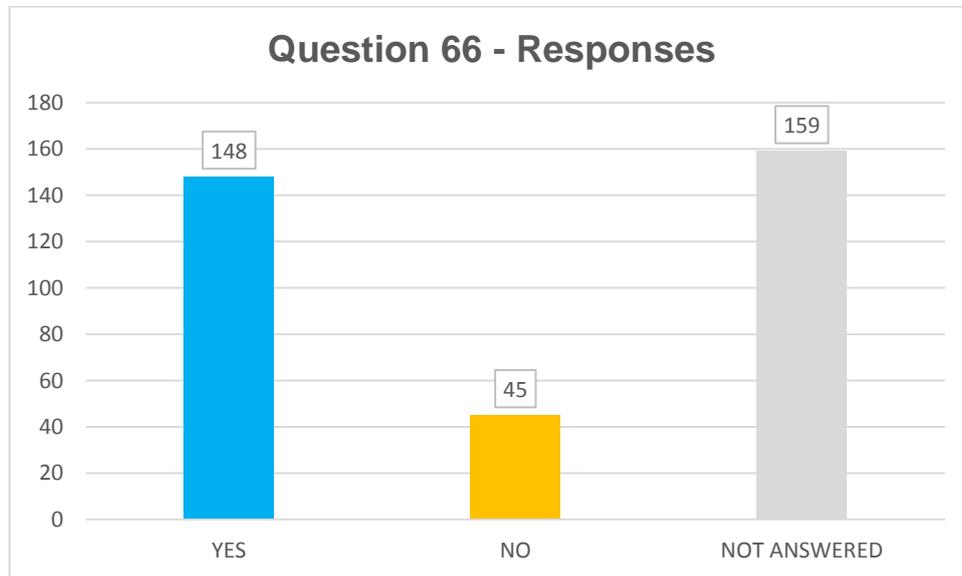
Question 65: Do you agree with the categorisation of the new offences included in Annex C?



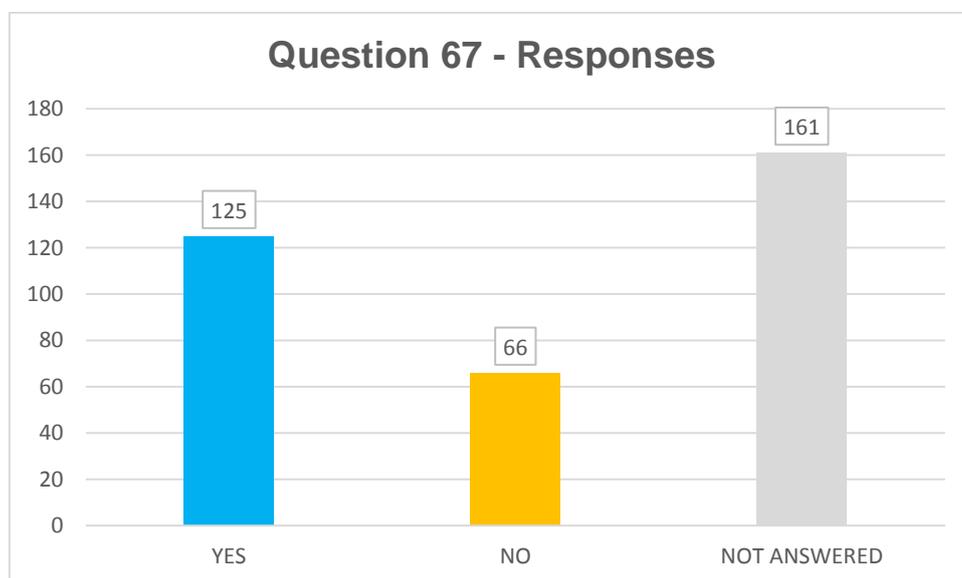
Question 65a: If no, please state how they should be categorised.

- Some respondents thought that “abusive behaviour towards a partner or ex-partner” should be on the 8A list of offences
- One respondent felt that many of the new offences shouldn’t be on either list
- Another stated that some of the common law offences are out of date and would simplify the system to remove them

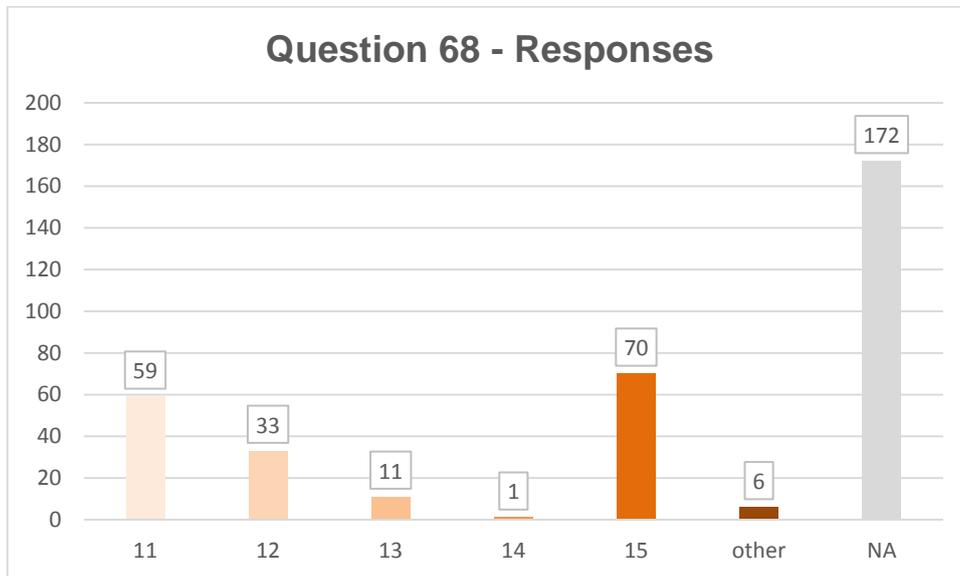
Question 66: Do you believe the rules for disclosure in the current form of 15 years and 7.5 years provide appropriate safeguarding and privacy protections?



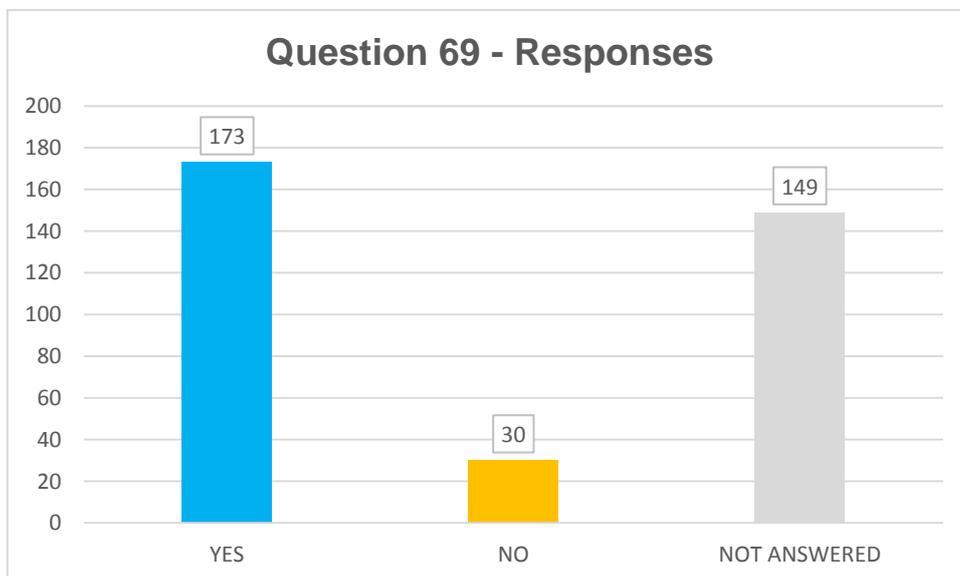
Question 67: Do you agree that a reduction in the disclosure periods from 15 & 7.5 years is appropriate considering the changing policy on rehabilitation of offenders?



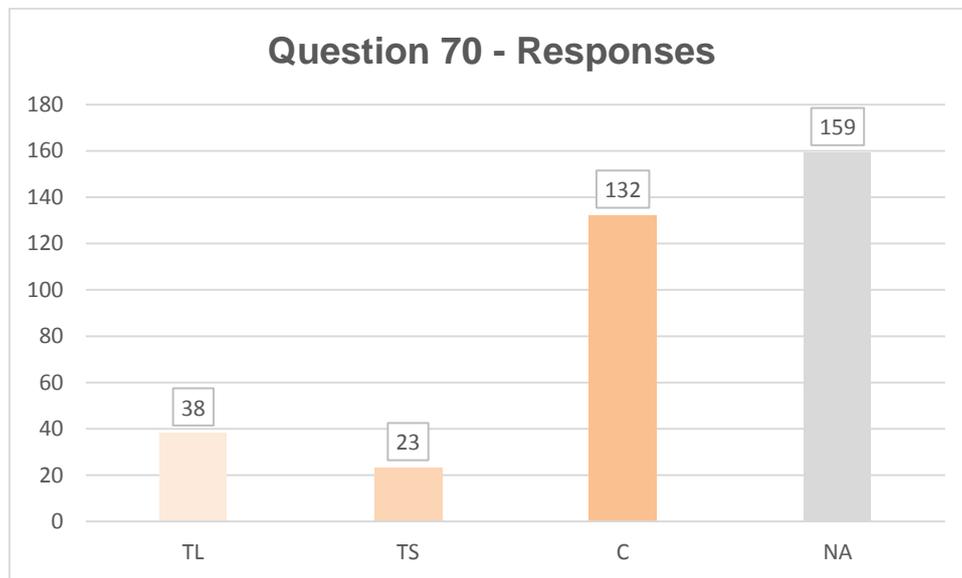
Question 68: What period between 11 and 15 years do you think is appropriate for disclosure?



Question 69: Do you think the application process to seek removal of a spent conviction should be reviewed?



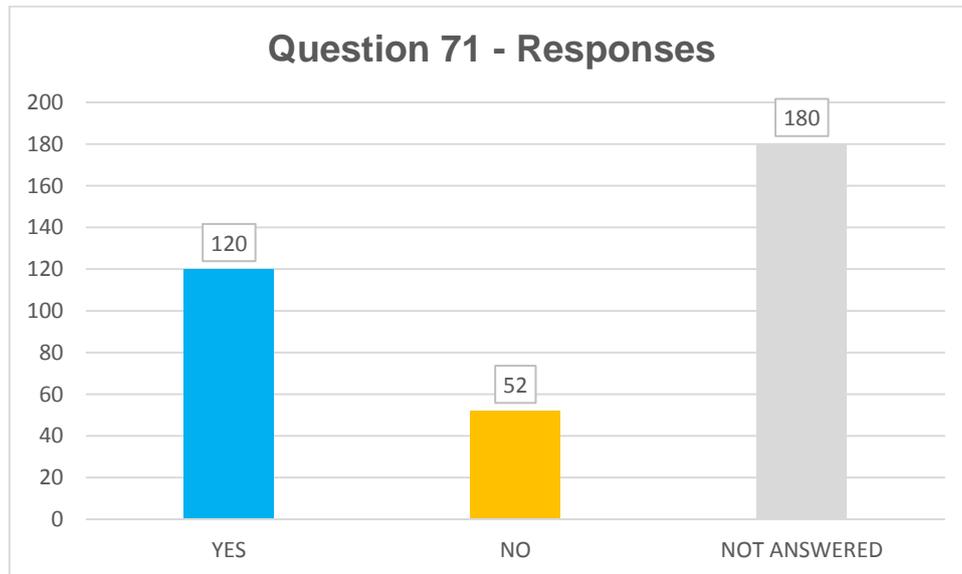
Question 70: At present, an individual has three months from the date of notification of an intention to appeal to make an application to a Sheriff. Do you think this time period is (too long, too short, correct):



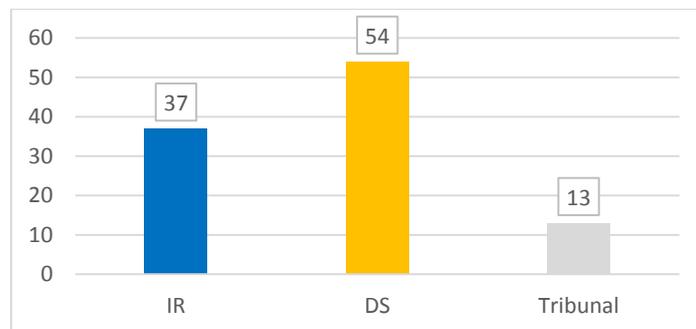
Question 70a: If you indicated that the time period is too long or too short, what do you think the time period should be?

- Responses between 2 weeks and 24 months
- Most popular responses were 1 month and 6 months

Question 71: Do you think any of the options set out above, those being the introduction of an administrative process stage prior to application to a sheriff, the introduction of an independent reviewer or making an application to a tribunal, offer viable alternatives to an application to a Sheriff?



Question 71a: If yes, which one?

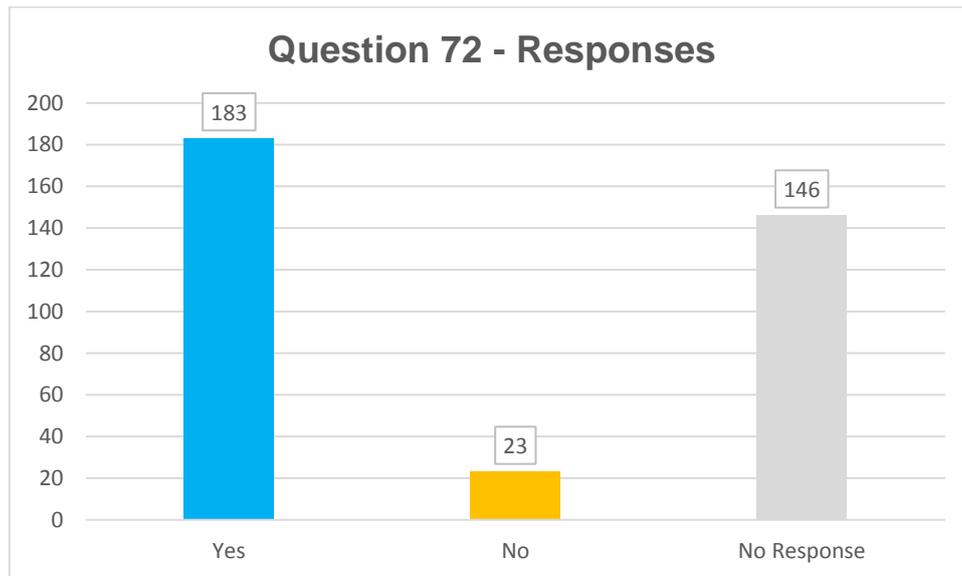


Question 71b: If not, do you have any other suggestions?

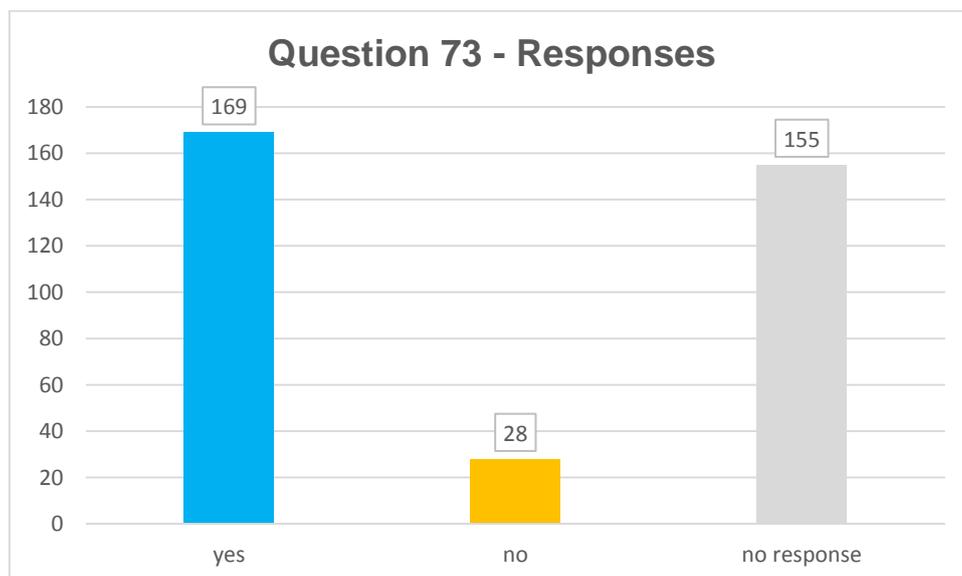
- Should stay with the judiciary
- More guidance and information needs to be available
- Concern independent reviewer would only review decisions based on a point of law
- Concerns about Disclosure Scotland's expertise to make decisions to consider convictions in other contexts than barring

Section 6 – Additional policy questions

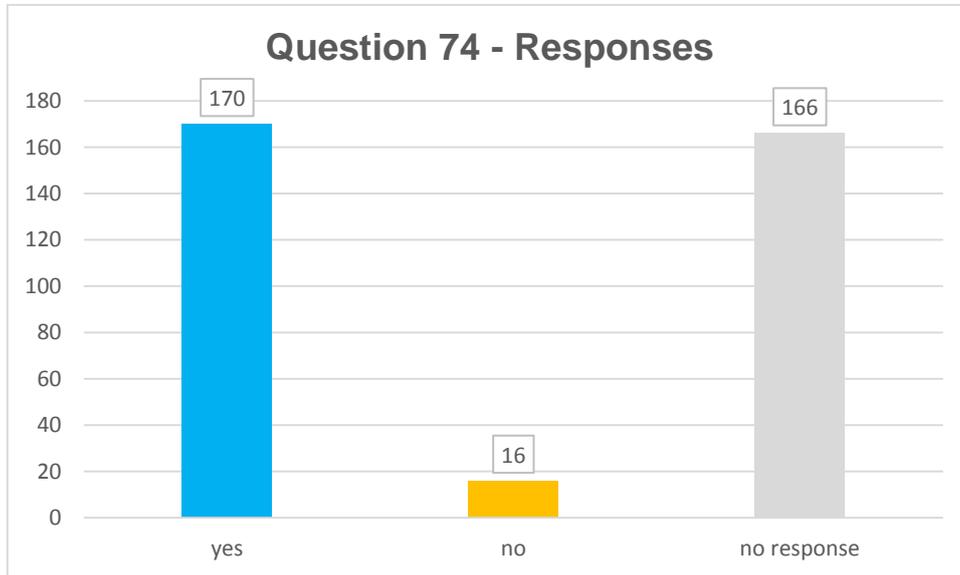
Question 72: Do you agree that Ministers should have a power to issue statutory guidance to Police Scotland on the processes governing the generation and disclosure of ORI, including seeking representations from the individual before issuing it for inclusion on an enhanced disclosure or PVG scheme record?



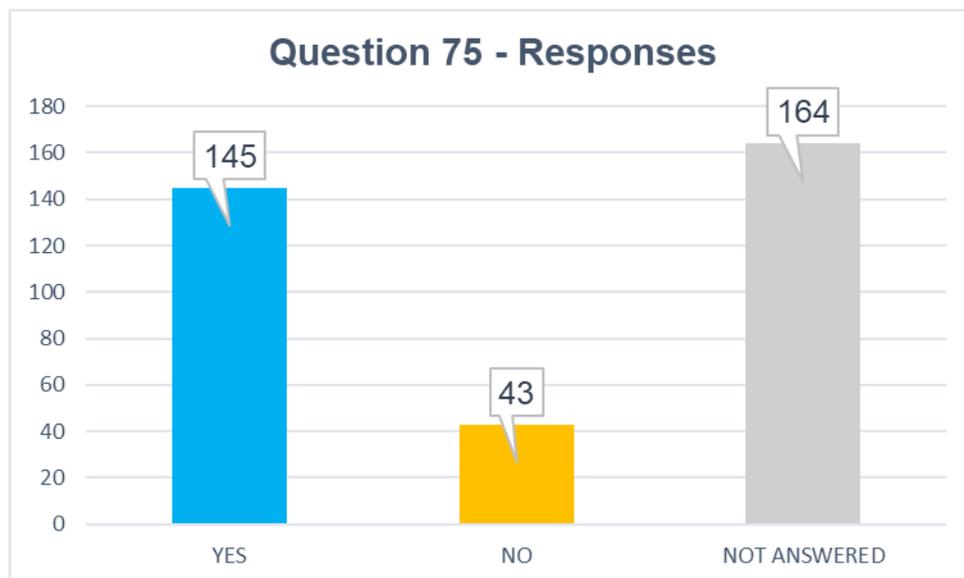
Question 73: Do you agree with Ministers proposals to allow for representations to the chief constable before disclosure of ORI to a third party and for providing the individual with the option to appeal to an independent reviewer before ORI is disclosed?



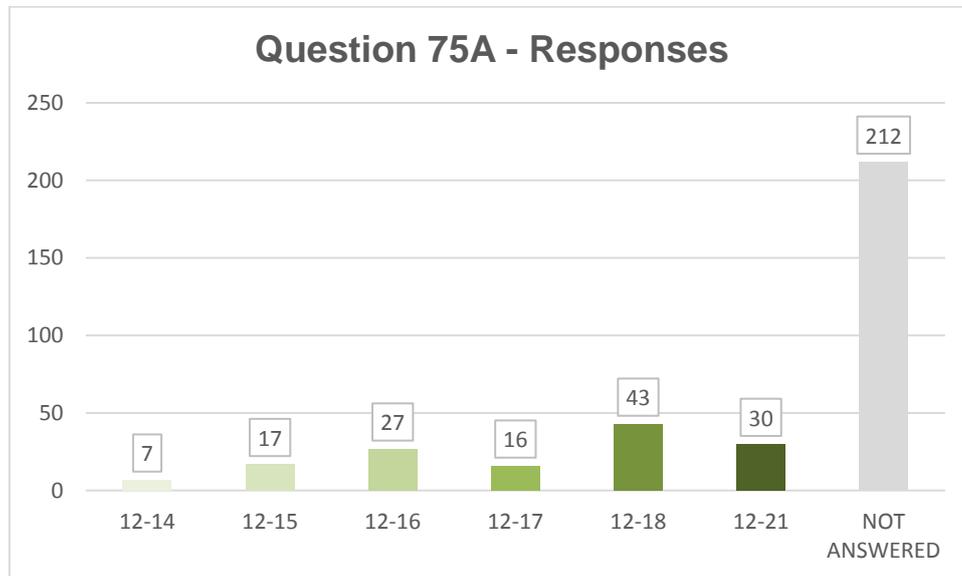
Question 74: Do you agree that the independent reviewer being appointed under the ACR Bill should be used for reviewing ORI?



Question 75: Should there be specific provisions reducing the possibility of the state disclosure of criminal convictions accrued by young people 12 years or older on all types of disclosure?



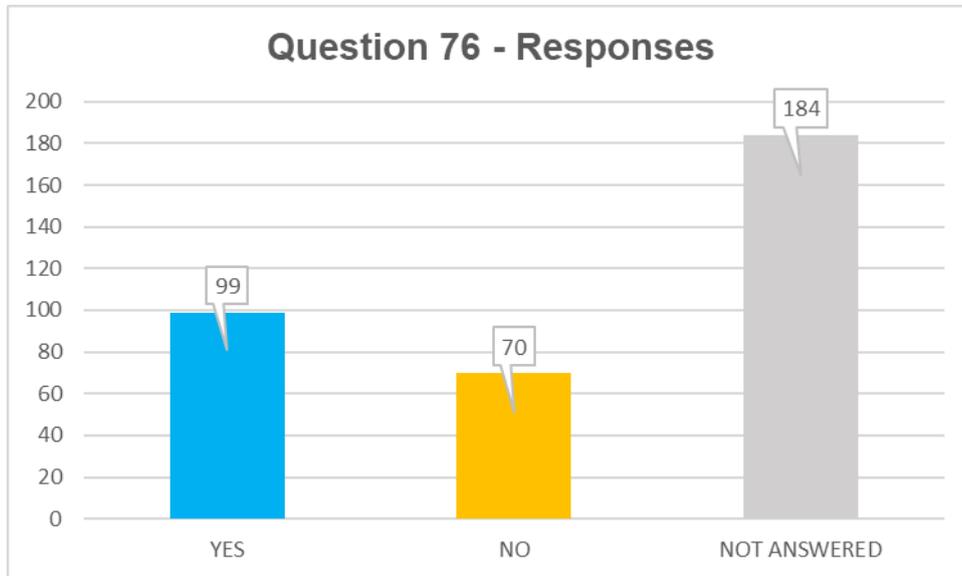
Question 75a: If there should, what age range should the special provisions apply to?



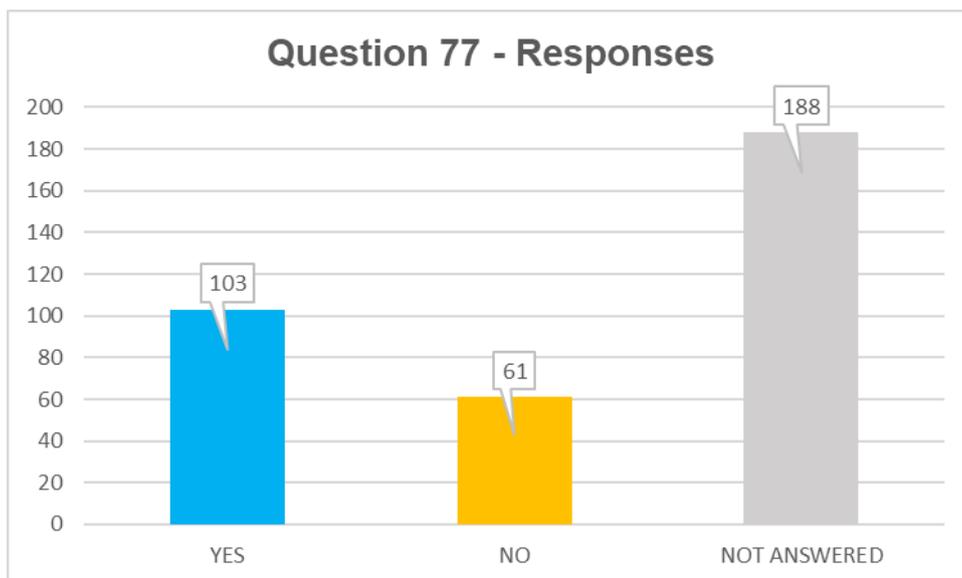
Question 75b: Please tell us why you have selected an age range or given your answer.

- 12-18: strikes a balance between allowing young people to move and recognising that they can be viewed as an adult at 18
- 12-21: youth crime tends to desist by mid-20s and this age range provides a better opportunity for young people to move on
- The lifelong effects for care-experienced people were also noted, as there was concern that disclosure of convictions can act as a barrier to further opportunities for young people
- Six respondents felt we should consider extending the age range to 12-25, which coincides with the peak age for offending and citing evidence that the brain is not fully mature until mid-20s and development continues up to age 25

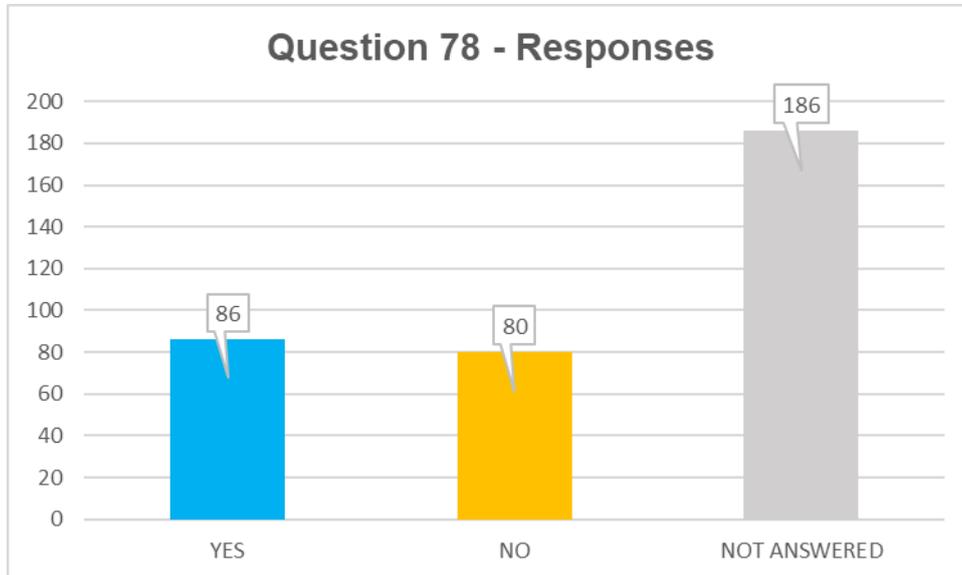
Questions 76: Should there be a presumption against the disclosure of all convictions accrued between 12 and a specified upper age, with the only possibility being police disclosure as ORI after ratification by the Independent Reviewer on the Level 2 and PVG Level disclosures?



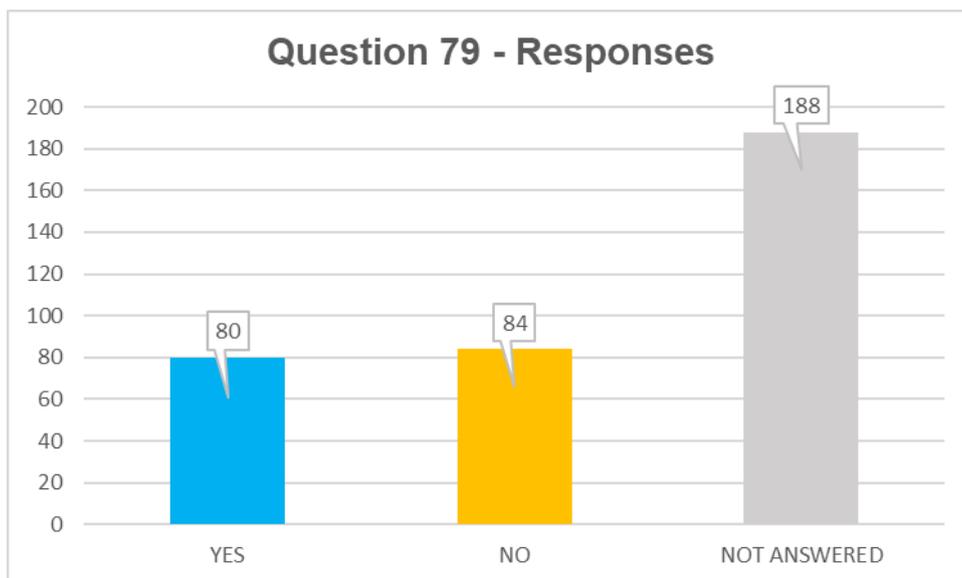
Question 77: Should there be no state disclosure of any conviction between the age of 12 and the specified upper limit, except where the conviction is for an offence listed in schedule 8A or 8B?



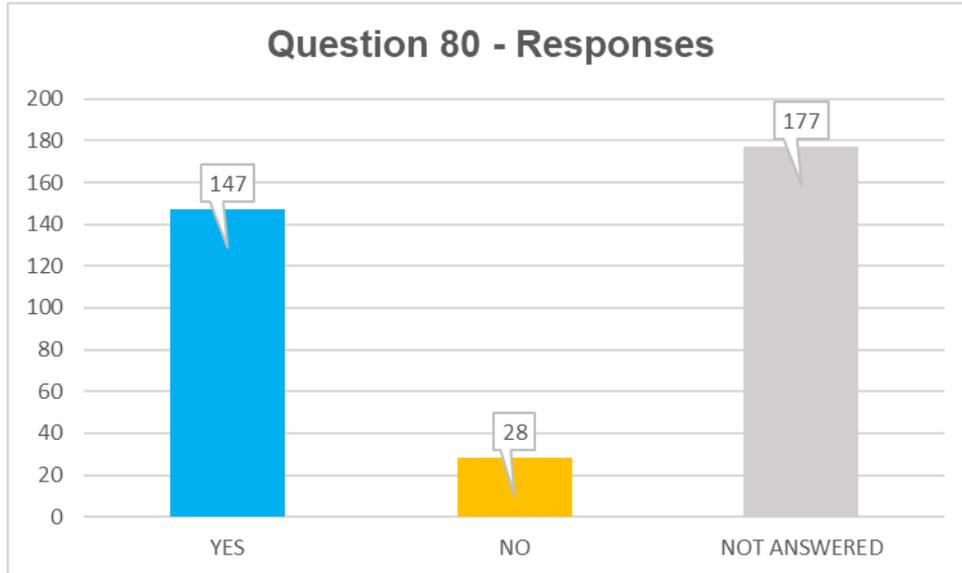
Question 78: If there is a disclosure of an 8A or 8B conviction(s) should all other unspent convictions be disclosed even if the other unspent convictions are for offences not listed in schedule 8A or 8B?



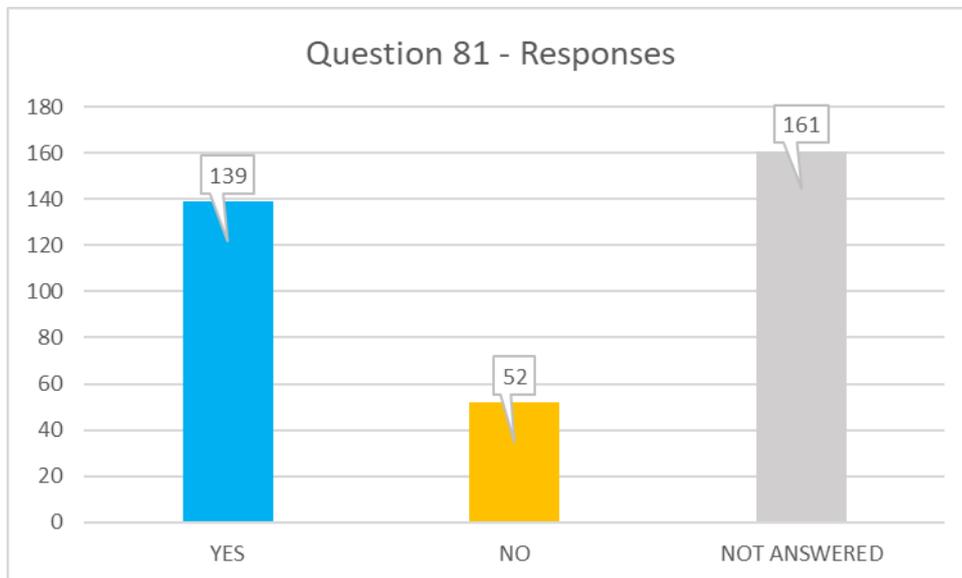
Question 79: Should disclosure applicants with 8A and 8B convictions be able to apply immediately to a sheriff (or other authority) to have those treated as protected regardless of the passage of time?



Question 80: When including ORI on any disclosure about conduct between the age of 12 and the upper age limit should the police only be able to refer to matters they reasonably considered to be serious?



Question 81: Do you agree with the proposal to place a lower age limit on applicants for criminal record checks?



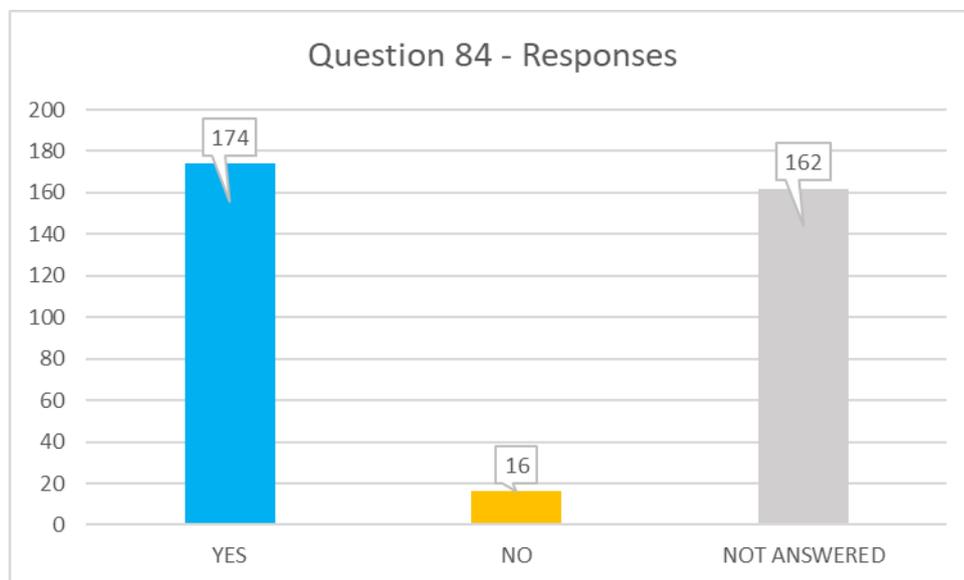
Question 82: In what circumstances should a criminal record check for a child under 16 be permitted?

- Roles similar to foster care proposal given in consultation
- 15 year olds applying for college/work having met school leaving age requirements

Question 83: Do you have any concerns with the proposal to introduce a minimum age of 18 years for people who want to become registered person or those who are nominated to be countersignatory in connection with Level 2 and PVG Level disclosures?

Several responses asked that it be made 16 years old, in line with Scottish voting age, minimum age of directors and OSCR minimum age for trustees.

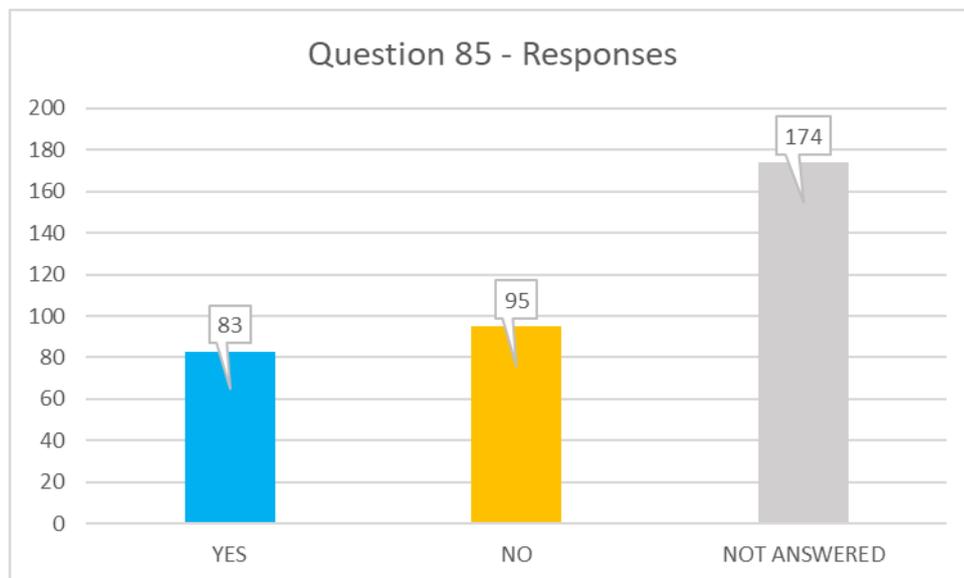
Question 84: Do you think a supported person arranging self-directed social care should have access to vetting information which could include details about previous convictions relating to a prospective carer?



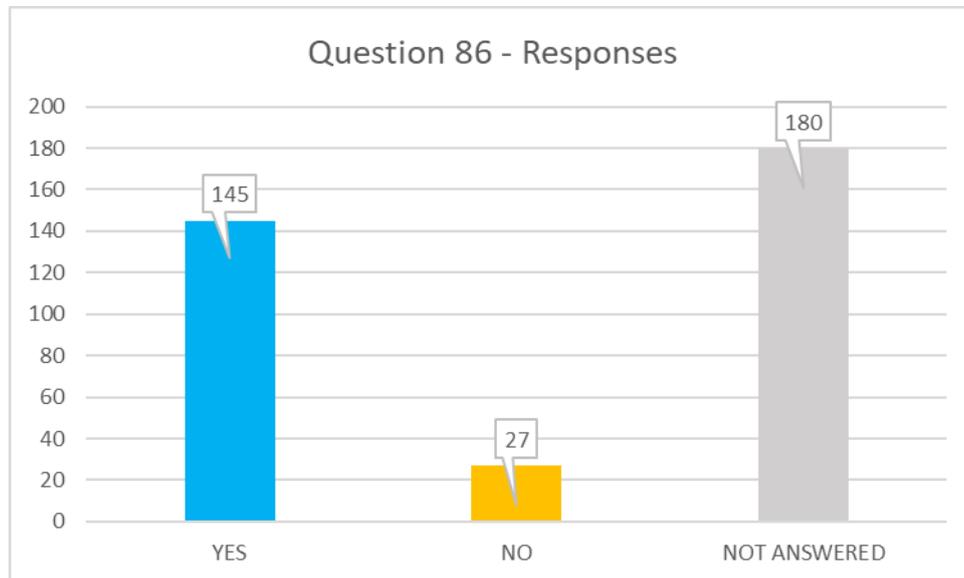
Question 84a: If you responded ‘No’ to Q84 , do you have any suggestions about how Disclosure Scotland checks could be structured to assist a supported person making their own arrangements for self-directed social care?

- Continue to use scheme membership but associate the supported person with the member
- Third party registered body to receive the information and make assessment on suitability
- More support to interpret the information supplied by Disclosure Scotland

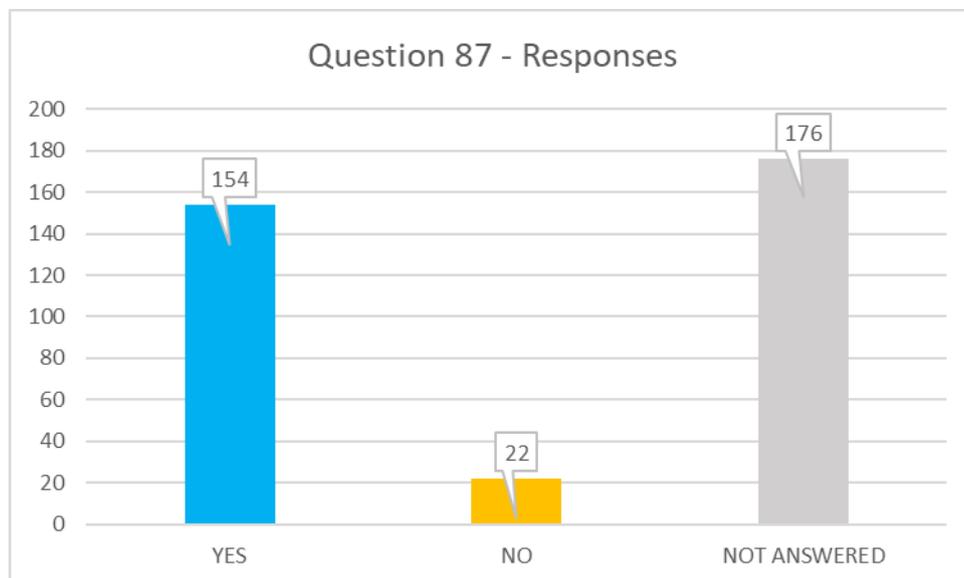
Question 85: Do you think this approach for private individuals working with children or protected adults is correct?



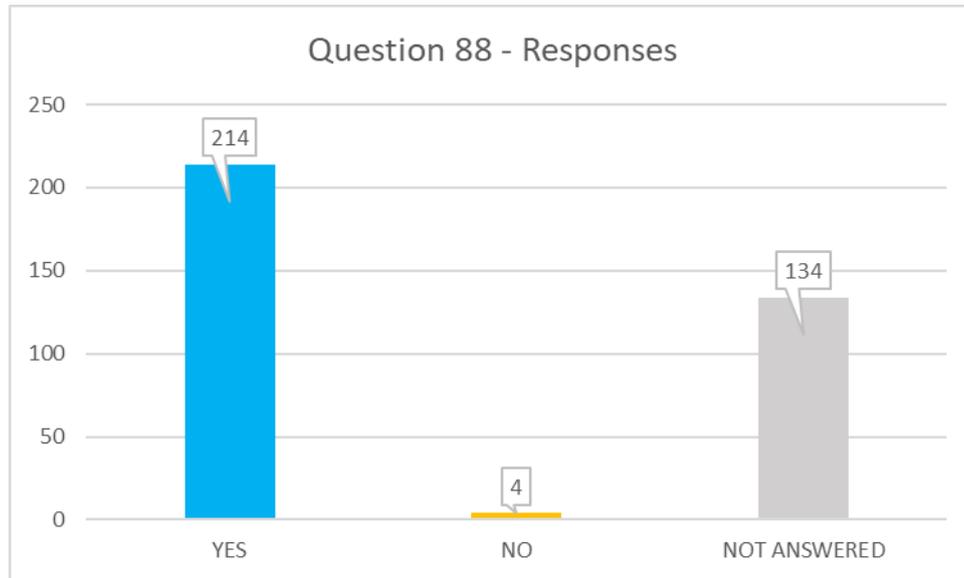
Question 86: Do you think that specialised interpreters whose assistance may be needed to allow a person to participate in day-to-day life it should be regulated work?



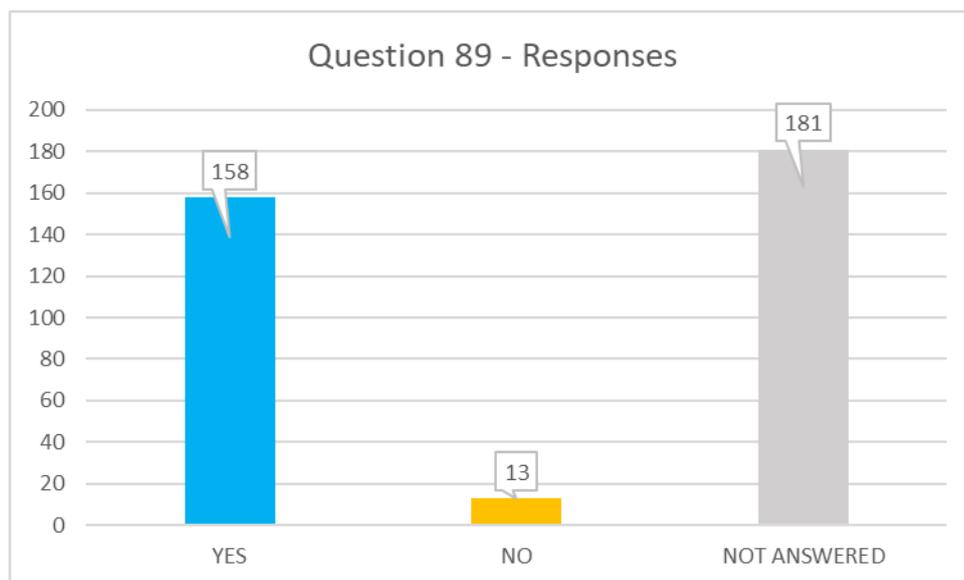
Question 87: Should vetting information be available if the arrangements are being made by a private individual?



Question 88: Do you agree that the law be changed to sort this anomaly that a charity must have one main purpose only, that is work with children or work with protected adults, for a trustee to be able to join the PVG Scheme and if a charity has as its main purpose services directed at both vulnerable groups then trustees cannot apply to join the PVG Scheme?



Question 89: Do you think that provision should be made to bring into force the amendment at section 78(1) of the 2007 Act that would have allowed information about a notification requirement under the 2003 Act made following an application by a chief constable to be included on a basic disclosure?



Questions 90-94

These questions looked for views to inform impact assessments and will be looked at in those reports.

List of annexes to full consultation report

Annex A - Summary and observations from consultation events

Annex B - List of organisations represented at engagement sessions

Annex C - Agreed Publication of Responses - List of Respondents

Annex D - Question 22a: additional roles



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