



THE UNIVERSITY *of* EDINBURGH

A Guide to Employment Checks

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Introduction

This guidance document has been written to support the end-to-end business process for undertaking Disclosure or Protection of Vulnerable Groups (PVG) checks, including the ongoing monitoring required and what to do when a member of staff transfers to a new post or has a change to their duties. Please familiarise yourself with the [Protection of Vulnerable Groups Policy](#) and the information on [Disclosure and PVG Checks](#) webpage.

With effect from 01 April 2025, as a result of the implementation of the Disclosure Scotland Act (2020) it will be an offence for the University:

- to offer a role requiring PVG (a 'regulated role') to an individual unless we have first carried out a PVG check on them unless we make the offer of the role conditional on receipt of a PVG check

for an individual:

- to carry out, or agree to carry out, a regulated role if they are not a PVG scheme member (unless that agreement is subject to them joining the scheme)
- For roles requiring PVG scheme membership, individuals will not be permitted to commence work until their PVG certificate has been received.

This is also applicable to existing PVG scheme members. The University is legally required to carry out its own check and is not able to accept a PVG certificate from e.g. an individual's previous employer.

Regulated Roles

Regulated roles can include employees, contractors, volunteers and students. The activity must be a necessary part of the individual's role and can include tasks that the individual:

- is expected to do as part of their post on an ongoing basis (e.g. it's listed in their job description) or
- can reasonably be anticipated as being part of carrying out their role or
- carries out regularly or
- is designated to do as part of a pool of people who are specifically available for a role that includes a regulated activity.

Further information is available on the [Disclosure and PVG Checks](#) webpage.

Managers and Supervisors

A PVG check is mandatory where an individual's normal duties include the day-to-day supervision or management of an individual carrying out regulated work i.e. managers of staff who require PVG for their role also need PVG themselves, even if that manager has no contact with children/protected adults and wouldn't otherwise require PVG.

Only the individual's immediate manager/supervisor needs to have been checked. Their supervisor in relation to their duties requiring PVG may be someone other than their line manager.

Individuals requiring PVG checks for their role will not be permitted to commence work until their manager's PVG certificate has also been received

The guidance has been written to cover each stage in the process. The responsibilities of a Line Manager, Hiring Manager and School or Department Administrator may vary in this process between Colleges, Schools and Professional Service Group Departments. For example, a School or Department Administrator could be performing tasks in the process of a Line Manager or Hiring Manager and where there is overlap, this is shown.

Line Managers should contact their local support team to understand the process and responsibilities within their own area.

Disclosure/PVG Check levels from 01 April 2025

The Disclosure (Scotland) Act 2020's provisions that took effect on 1st April 2025 has reduced the number of disclosure levels from four to two.

Pre April 2025	From 01 April 2025	Examples of Roles in the University where this check applies
		Please note this list cannot be definitive and will always be evolving
Basic Disclosure	Level 1 – checks will show unspent convictions	At Hiring Manager's discretion. May be appropriate for roles where a criminal record check is desirable but Level 2 checks are not available e.g. work involving dangerous pathogens
Standard Disclosure	Level 2 - will show information on unspent and certain spent convictions and other relevant information held by the police.	– Veterinary surgeons – Roles involving contact with contact with NHS patients where the activities do not amount to a regulated role requiring PVG e.g. interviews with patients

Enhanced Disclosure	Level 2 with barred list check - A Level 2 check that is applicable for limited specific purposes which involve working with children or protected adults, but do not make an individual eligible for joining the PVG scheme	Highly unusual at the University but may be applicable for work carried out in prisons
PVG Scheme	Level 2 PVG - replacing the PVG scheme and short scheme record, this will be a legal requirement for those carrying out a regulated role with children and/or adults.	– Clinical academic staff – Nurses and any other registered healthcare professionals – Certain posts which require the postholder to hold an Honorary NHS Contract – Chaplaincy staff – Counsellors – Disability Advisers – Wellbeing Advisers – Occupational Health Staff – LEAPS staff – Nursery Staff – Wardens – FASIC and Firbush staff – Teaching and Research staff working with schools or FE – Students undertaking course work that involves children or protected adults – Day-to-day supervisors or line managers of staff in regulated roles

Glossary

Level 1 Disclosure (Formerly Basic Disclosure)	The least-extensive level of criminal record check available. Shows only details of unspent convictions (as defined by the Rehabilitation of Offenders Act 1974). It is not job-specific and may be used for any purpose. Applications do not require countersignature by HR and can be submitted directly to Disclosure Scotland.
Countersignatory	The HR staff authorised to countersign Disclosure and PVG applications. Responsible for ensuring disclosure applications and requests are made and used, in accordance with the law; properly handling, storing and destroying disclosure information, paying monthly invoices and annual subscription fees.
Disclosure and Barring Service (DBS)	The body that processes criminal records checks for England, Wales, the Channel Islands and Isle of Man. DBS checks are not applicable to Scotland.
Disclosure Scotland	The agency responsible, on behalf of the Scottish Government, for issuing disclosures of an individual's criminal convictions and for managing and delivering the PVG Scheme in Scotland. Disclosure Scotland maintains a list of people who are barred from working with children and protected adults.
Level 2 with Suitability (Formerly Enhanced Disclosure)	While mostly superseded by the Level 2 PVG, this level of check remains as a form of higher level of criminal record check typically only required in relation to applications to adopt a child or for gaming and lottery licences. However, University employees may <i>exceptionally</i> require one if they are carrying out work in a prison. The certificate will show both unspent and certain spent convictions, inclusion on children's or adults' lists and information from the Sex Offenders Register.
Existing [PVG] Scheme Record	The check required for existing PVG scheme members who are applying to work for a new vulnerable group e.g. where an employee is already registered for work with children and has been offered a job at the University involving regulated work with protected adults, the University would arrange this type of application. It is therefore important to confirm if an individual is already a PVG scheme member, and if so, which group/s they are already registered to work with.
Home Country Criminal Record Check	Where an individual has been living outside the UK for a period of 3 months or more within the last 5 years, a police clearance certificate or equivalent is required from each country in which they have been resident. This is in addition to a disclosure or PVG check, which is required even if the applicant has never lived in the UK before. This is, however, not applicable for certain European countries with which Disclosure Scotland have particular arrangements, a list is specified on the Disclosure and PVG Request Form .
NHS Honorary Contract	The NHS issue honorary contracts to grant approval for employees of other organisations to carry out work involving patients, patient data or tissue. Criminal records checks are often a pre-requisite. Certain honorary contracts extend cover under the NHS Indemnity scheme called CNORIS (Clinical Negligence and other risk indemnity scheme) to staff who may have an impact on patient care.

Normal Duties	Activities must be part of a person's 'normal duties' to be considered a regulated role under the PVG scheme. Normal duties can be considered as something the individual might be expected to do as part of their post on an ongoing basis, for example appearing in a job description. One-off occurrences and unforeseeable events are excluded as these would be seen to be incidental.
Lead signatory	Also known as the 'registered person'. They are the countersignatory responsible for ensuring that disclosure information is handled properly in the University and are the principal point of contact between Disclosure Scotland and the University.
Protected adults	A protected adult is defined as an individual aged 18 or over who, by reason of physical or mental disability, illness, infirmity or ageing either has an impaired ability to protect themselves from physical or psychological harm or require assistance with the activities of daily living. Other adults may be included such as those in receipt of a health service. For full details please refer to the guidance on our website: Disclosure and PVG Checks Human Resources
Letter of Access	Letters of access are issued to research staff who are connected to an NHS research study and have contact with NHS patients, or access to patient data (whether anonymised or identifiable) or tissue, but are not caring for patients or undertaking regulated work. Criminal records checks may be a pre-requisite.
Level 2 PVG	The Protecting Vulnerable Groups (PVG scheme) is designed to help ensure people who are unsuitable to work with children and protected adults cannot undertake a regulated role with these vulnerable groups. A PVG member's certificate will show both unspent and certain spent convictions, unspent cautions, information from the Sex Offenders Register and other relevant information. Disclosure Scotland also keeps checking members' suitability to continue work with children and/or protected adults, may subsequently bar them from regulated work and would tell their employers that they have been barred.
PVG Update (also known as Scheme Record Update or Short Scheme Record)	The check required for existing PVG scheme members who are working with the same vulnerable group but need to add the University to their membership. e.g. where a new employee is already registered for work with children and has been offered a job at the University that is a regulated role with children, the University would arrange this type of application. It is therefore important to confirm if an individual is already a PVG scheme member, and if so, which group/s they are already registered to work with.
Regulated role	The PVG scheme only applies to regulated roles with children or protected adults. Regulated roles involve not only contact with these groups alone but must involve particular activities . Contact can be supervised or unsupervised, depending on what activity you are doing. Further guidance is available from Disclosure Scotland PVG scheme - Regulated roles guidance - mygov.scot
Research Passport	An application form that a researcher completes to inform the NHS of proposed research activity involving work with patients, patient data or tissue. The information confirmed in the application form enables the NHS to have confidence that the process to carry out criminal record and other pre-engagement checks is in line with the NHS's standard checks and to then issue an honorary research contract or letter of access as appropriate. A research passport is valid for up to 3 years and

	can be used to detail multiple research projects and can be presented to different NHS Boards, rather than pre-employment checks being completed repeatedly on each occasion.
[PVG] Scheme Record	The type of PVG scheme membership application required for those who are joining the PVG scheme for the first time.
Level 2 Disclosure (Formerly Standard Disclosure)	The level of criminal record check required for specific professions (e.g. veterinary surgeon) or duties (e.g. contact with NHS patients that does not require PVG). The certificate will show both unspent and certain other information such as unspent cautions or children's hearing outcomes.

End to End Process Map

Please see this link for the [End-to-End Process Map](#)

Key Roles

Role	Description
Countersignatory	One of the HR staff authorised to countersign Disclosure and PVG applications. Responsible for ensuring disclosure applications and requests are made and used, in accordance with the law; properly handling, storing and destroying disclosure information, paying monthly invoices and annual subscription fees. Contact details - Employment.Checks@ed.ac.uk
HR Partner	A member of the HR Partnering team who can provide advice and guidance throughout the recruitment process.
HR Services Team	Members of the central HR team that own key transactional elements of the recruitment cycle, e.g. approving/rejecting job requisitions and job offers. Has visibility of job requisitions without being a member of the hiring team.
Line Manager	All members of staff that have or will have direct or matrix style management responsibilities for the role being recruited. Line Managers may also be Hiring Managers. Line managers would be expected to review and approve the requisition as appropriate.
School/Department Administrator (SDA)	Staff that provide local administrative/operational support for the end-end recruitment process, including offline activity and practical arrangements.

Before you start

Familiarise yourself with the [Protection of Vulnerable Groups Policy](#) and the information on [Disclosure and PVG Checks](#) webpage. Please contact the Countersignatories, by email at Employment.Checks@ed.ac.uk if you have any questions or if the case is particularly complex before you start.

Step 1 – Establish if a Disclosure/PVG check is required

While ideally determined by the Line Manager/SDA as part of the Job Grading process and recorded under the section of ‘Pre Employment Checks’ of the Job Description, it is recognised that duties may also change over time and grading may not capture all eventualities.

Individuals requiring a PVG check for the role must not commence employment until both their PVG certificate, and their manager’s if applicable, have been received.

Please refer to guidance below under [‘Changes to Role or PVG Membership’](#) where a check may be required that is not in connection with a recruitment process.

	Line Manager/SDA	HR Partners	Countersignatory
Job Description and Job Grading	- Ensures duties that may require a criminal record check are detailed in the job description for the role and noted on the Job Grading request form (if grading required). - Where any work with NHS patients, including data or tissue only, is involved, check the NHS Honorary Cover table to establish the pre-employment checks and required documentation to obtain a NHS	- Grade job ensuring that the ‘Pre Employment Checks’ for the role section accurately confirms the pre-employment checks required. - Checks with the Hiring Manager to clarify the postholders’ duties as required and to discuss the level of check necessary.	Provides advice on checks required (and level of NHS honorary cover, if applicable) so this is correctly established from the outset of recruitment.

	honorary contract, research passport or letter of access as appropriate. Where a current employee's duties change such that a criminal record check is going to become necessary for their role when it was not previously, managers should contact the countersignatories in good time (at least 3 weeks) prior to the change in activities taking effect. A Disclosure or PVG check can be arranged at any time by submitting the request form.		
Supporting Information	Disclosure & PVG request form Job Grading NHS Honorary Cover Table Guide to Recruitment and Onboarding Check if a role needs PVG scheme membership - mygov.scot PVG scheme - list of regulated roles - mygov.scot PVG scheme - list of activities for regulated roles - mygov.scot PVG scheme - Regulated roles guidance - mygov.scot		

Step 2 – Recruitment

	Line Manager/SDA	HR Operations
Approval to Recruit	Checks 'Pre-Employment Checks for the role' section of job description. Includes on the Job Requisition Business Case Form (JRBC) if a Disclosure or PVG check is required for the role Seeks Approval to recruit following internal processes	
Advertising	Creates the Job Requisition in People and Money and: - Selects the relevant criminal record check type from the drop-down list in the Details section. - Inserts the relevant prescreening questions in the prescreening questionnaires section. For Non-Advertised Posts go to Step 3 Offer of Employment	• Checks the JRBC for Disclosure/PVG requirement • Checks the job description is consistent • Updates internal trackers as required
Candidate Selection	Checks for responses to screening questionnaire as part of shortlisting Where convictions have been disclosed, refer to the guidance on the Candidate Selection Webpage (Step 4; Interview pre-employment checks) and liaise with your HR Partner if further advice required	
Supporting Information	Guide to Recruitment and Onboarding How to create and maintain a job requisition Recruitment of Ex Offenders Policy Statement	

Step 3 – Offer of Employment

From 01 April 2025 it will be an offence for the University to offer any type of regulated role prior to receiving a PVG certificate, unless the offer of employment is made subject to receipt of a valid PVG certificate. Please set a reasonable start date, Disclosure / PVG Checks can take a minimum of 2-3 weeks but processing time by Disclosure Scotland does vary.

	Line Manager/SDA	HR Operations	Countersignatory	Employee
Tasks	Include the appropriate subject to clause in the offer letter, this applies regardless if the role was advertised or not. The Offer letter templates have this included for use as required. In preparation for submitting the Disclosure and PVG Request Form (Step 4): - Obtain and verify copies of 3 forms of ID, typically in conjunction with carrying out a right to work check. At least one item must be photographic and one provide proof of home address. - If the successful candidate is an internal member of staff check if they hold a valid Disclosure/PVG check with the University for the relevant group (i.e. work with children and/or protected	Check the Request for Offer Update local trackers.	Can confirm if an internal member of staff holds a valid Disclosure/PVG check with the University for the relevant group (i.e. work with children and/or protected adults). Confirms if line manager/supervisor check is required.	Provides information requested to Line Manager/SDA: - Provides their ID and details to the SDA. - Provides an overseas police clearance certificate if applicable.

	adults). If you are unsure contact the countersignatory to confirm at Employment.Checks@ed.ac.uk Please note: current members of staff who are transferring internally within the University and are already registered with the Disclosure/PVG scheme (for the relevant list) are not required to apply again. • Check the applicant's CV to confirm they have lived overseas for a period of 3 months or more within the past 5 years and instruct them to obtain a police clearance certificate from that country, please see the Criminal records checks for overseas applicants webpage. Please note this is not essential in relation to France; Germany; Greece; Hungary; Ireland; Italy; Lithuania; Netherlands; Poland; Portugal; Romania and Spain as Disclosure Scotland have reciprocal agreements to undertake criminal records checks directly with the relevant authorities in these countries. • Check if the employee's Line Manager or Supervisor will			
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	require A PVG check. This mandatory where an individual's normal duties include the day-to-day supervision or management of an individual carrying out regulated work i.e. managers of staff who require PVG for their role also need PVG themselves, even if that manager has no contact with children/protected adults and wouldn't otherwise require PVG for their own role. Employees requiring PVG for their role will not be permitted to commence work until their manager's PVG certificate has also been received.			
	Supporting Information How to Create and Manage a Job Offer			

Step 4 – Requesting the Disclosure/PVG Check

	Line Manager/SDA	Countersignatory	Employee	HR Operations
Tasks	1.Once you have the required information as per step 3 above, and the offer has been accepted, complete the Disclosure and PVG Request Form. It will be necessary to	3.Checks all details and ID provided by the SDA. 3a.Keeps tracker up to date throughout the application process.	4.Receives an email from Disclosure Scotland with a link to the online application for completion.	7.HR Operations will be closely monitoring start dates for anyone where they know a PVG is required, please help by setting a reasonable start date or changing this if

	work with the applicant to complete all relevant details. Please follow the guidance on the form to help you. 2.Submit the form to the countersignatory attaching all of the relevant information to Employment.Checks@ed.ac.uk To help the countersignatory team processing applications, please attach a copy of the Job Description for the person applying for the Disclosure/PVG Check. Please note that we do not require this if the application is for a Supervisor or Line Manager of someone in a regulated role. Monitor the start date and amend this in People and Money if the Disclosure/PVG Check will not be completed in time. Start dates can easily be amended whilst the individual is a pending worker, follow the steps in the Guide to Recruitment and Onboarding.	3b.Retains documentation until check complete in order to be able to respond to any queries Disclosure Scotland may send. 3c.Initiates the online PVG application, monitors progress, responds to any queries from Disclosure Scotland and contacts Disclosure Scotland if no outcome received after 2 weeks. 6.Once the employee has agreed to share their disclosure with the University, Disclosure Scotland will send an email with a secure link to the countersignatory. Where convictions have been disclosed, these are considered in accordance with the Protection of Vulnerable Groups Policy. Records all details on tracker. The online certificate will automatically expire 14 days after it is first viewed although a copy may be retained in some circumstances if required until an	-The link is valid for 14 days. They will need a ScotAccount which requires verification of identity to set up (in addition to the ID already provided to the University in order to initiate their application). There is information on this the ScotAccount - mygov.scot website. -Once the application is complete, they will receive an email with instructions advising on how they can access their certificate online. Applicants have the option to notify Disclosure Scotland that they will seek a review of the content of their disclosure. This must be done within 10 days of the date of issue of their disclosure. There is guidance on this process on the Review application guidance - mygov.scot website. They will be unable to share their disclosure with the University until the review process is complete.	you know the PVG will not be received in time. Start dates can be easily amended while the individual is still a pending worker.
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		NHS honorary cover application is completed. (The employee will be able to access their disclosure indefinitely via their ScotAccount).	5.If they do not wish to seek a review, or are not eligible to seek one, in order for the University to receive a copy of their disclosure they must consent to share it with the University by selecting the share option on their disclosure. This step is necessary irrespective of whether it contains any disclosure information. They have 14 days to release their disclosure to the University, after which time a new application would need to be started.	
	Supporting Documents Disclosure & PVG request form How to create and manage a job offer Protection of Vulnerable Groups Policy Information for transgender and non-binary disclosure applicants ScotAccount Guidance on how to apply for a review of disclosure information Guide to Recruitment and Onboarding.			

Step 5 – Requesting the Contract

Where the role requires a Level 2 **PVG** check the employee **must not start work until the confirmation that a clear check has been received** for both the employee and their manager (if not already PVG checked). Contracts will not be issued without this confirmation.

Only in **exceptional circumstances** where a Level 2 **Disclosure** check is required can the employee start work before this being confirmed. This should be agreed with your HR Partner and an appropriate Risk Assessment completed. The contract must be requested with the appropriate subject to clause.

	Line Manager/SDA	HR Operations	Countersignatory	Employee
New Hires/Rehires, Transfers, Additional Posts and Internal Secondments via Advertised Posts and any hires via 'Add Pending Worker'	Once advised by the countersignatory (by email) that a clear check has been received (for both the employee and their line manager if the manager had not already been PVG checked) complete the 'Request contract' onboarding task within Journeys and attaches the confirmation email to the task. Please follow the steps in the Guide to Journeys for Line Manager or SDA .	Check request and generate contract.	Confirm clear check to Line Manager/SDA	Receives and task within Journeys to read and sign their contract and upload the signed copy to Document Record.
Transfers, Additional Posts and Internal Secondments via Service Request	Once advised by the countersignatory (by email) that a clear check has been received (for both the employee and their line manager if the manager had not already been PVG-checked), complete the Request for	Check Request, action transfer and generate transfer contract.	Confirm clear check to Line Manager/SDA	Receives and task within Journeys to read and sign their contract and upload the signed copy to Document Record.

	Transfer, Additional Post or Internal Secondment Form and submit this with the confirmation email to HR by raising a Service Request.			
Supporting Information	Guide to Recruitment and Onboarding Guide to Journeys for Line Manager or SDA.			

Changes to Role or PVG Membership

While pre-employment checks are ideally determined by the Line Manager/SDA as part of the Job Grading process it is recognised that duties may also change over time and grading may not capture all eventualities.

Individuals requiring a PVG check for new duties must not commence those duties until both their PVG certificate, and their manager's if applicable, have been received.

Where an individual is no longer undertaking a regulated role we must inform Disclosure Scotland so it is important that countersignatories are advised of any such changes.

	Employee/Line Manager/SDA	HR Partners	Countersignatory
New requirement for checks	Where a current employee's duties change such that a criminal record check may become necessary for their role when it was not previously, managers should contact the countersignatories in good time (at least 3 weeks) prior to the change in activities taking effect. A Disclosure or PVG check can be arranged at any time by submitting the Disclosure and PVG Request Form. Please note that where a PVG check is required, the employee's line manager will also need to apply unless they have already been PVG checked by the University for regulated roles with children and/or protected adults as appropriate.	Offers support if advice on the level of check necessary.	Provides advice on checks required (and level of NHS honorary cover, if applicable) and processes checks.

	Individuals requiring a PVG check for new duties must not commence those duties until both their PVG certificate, and their manager's if applicable, have been received. If advice on whether a check is required or the appropriate level is required, this should be sought in the first instance from HR Partners with complex cases then referred on to countersignatories. Where any work with NHS patients, including data or tissue only, is involved, please also check the NHS Honorary Cover table to establish the checks and required documentation to obtain a NHS honorary contract, research passport or letter of access as appropriate.		
Changes to PVG member details	Employees who have changed their name or address must advise Disclosure Scotland within 3 months of the change by completing the Change of PVG Membership Details form and submitting this to dsupdate@disclosurescotland.gov.scot		
PVG is no longer required	Advises the countersignatories at employment.checks@ed.ac.uk when an individual no longer requires PVG for their role at the University due to a transfer to a new role or change of duties. However, PVG scheme members who are leaving the University entirely will be identified automatically so it is only necessary contact the countersignatory where there is continuing employment. Disclosure Scotland keep a record of parties with an interest in a PVG scheme member and will update them accordingly. PVG scheme members are subject to continuous monitoring and any new vetting information which indicates that they might be unsuitable for regulated roles is considered by Disclosure Scotland. All new conviction information on police systems is fed in automatically and associated with relevant PVG membership accounts. By		Regularly checks for PVG scheme members who have left the University and advises Disclosure Scotland so that they are removed from the University's account. Similarly notifies Disclosure Scotland when advised of an individual who no longer requires PVG for their role at the University i.e. due to a

	carrying out a PVG check, the University is recorded as having an interest in that PVG scheme member and will receive relevant notifications. It is therefore particularly important we advise Disclosure Scotland when we no longer have reason for an interest in an individual to ensure no further updates are received.		transfer to a new role or change of duties.
Supporting Information	Disclosure & PVG request form NHS Honorary Cover Table Check if a role needs PVG scheme membership - mygov.scot PVG scheme - list of regulated roles - mygov.scot PVG scheme - list of activities for regulated roles - mygov.scot PVG scheme - Regulated roles guidance - mygov.scot Change of PVG member details form - mygov.scot		