



On-going Regular Disclosure Checks Under PVG

As of April 2026, those joining the Protecting Vulnerable Groups (PVG) Scheme have a 5-year membership. However, the option is still open for you to run checks more often and this short paper is designed to help you to decide whether to carry out such checks or not.

Once someone becomes a PVG Scheme member through a PVG application you made, you have a registered interest in that scheme member. A registered interest means that Disclosure Scotland (DS) will update you of any changes in the individuals status within that 5 year membership. For example, DS will notify you if the individual becomes barred from that regulated role group or is under consideration for being listed.

Disclosure Scotland continually monitors:

- Any criminal convictions through regular and frequent checks against court records across the UK.
- Referral information - When an organisation removes the individual from a regulated role because of their suitability, they have a legal obligation to report this to Disclosure Scotland, this is called, duty to refer.
- Other intelligence is gathered regarding the individual's suitability to remain a Scheme member.

They will then make an assessment and where warranted, will “place an individual under consideration for listing”. This means that there will be a formal consideration of whether to list the individual and remove them from the regulated workforce. And those organisations with a registered interest in the individual will be notified.

For some, this process of proactive monitoring and notification will mean that there is no requirement for ongoing regular checks. Others may want to confirm that an individual carrying out a regulated role in their organisation have not committed ANY further offences since their initial PVG check and others again may be interested in specific types of minor offences which would not be of interest to Disclosure Scotland.

Example 1: an alcohol project wants to know about any minor alcohol-related offences committed – e.g. an alcohol counsellor being convicted of being drunk and incapable. One means of achieving this is to carry out regular update checks under the PVG Scheme. Other measures may include requiring people to declare any convictions while they are in post.

Example 2: An organisation may have a chaperone role where the chaperone is expected to drive service users to and from events or appointments. Whilst not an offence that would bar an individual from that regulated role, the organisation may require to get regular checks to ensure the chaperone doesn't incur any driving convictions that would deem them unsuitable for that specific role, e.g. a drink driving or speeding conviction.

When deciding whether or not to undertake regular checks, you should also bear in mind:

- Regulatory or funding bodies may REQUIRE more regular checks.
- It is not a legal requirement to carry out regular checks throughout the 5-year membership.
- Carrying out regular checks can be time-consuming and difficult.

Noting that not all organisations are comparable, some have different policies and procedures in place adhere to.



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