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| New Logo 2 | | Barnardo’s | |
| Corporate Policy | |
| Criminal Records Disclosure Policy - Scotland | | | |
| **Risk Owner:** | Director of People & Culture | | |
| **Supported by:** | Employee Relations and Policy Manager | | |
| **Date Approved:** | 23.11.23 | | |
| **Date for Review:** | 31.03.25 | | |
| **Distribution** | Internal and External - Non-confidential | | |
| 1. **Purpose** | | | |
| Barnardo’s has developed this policy:   1. in line with our safeguarding principles, to help us ensure that the children, young people and adults at risk who we work with, and for, are protected and kept safe from harm by identifying individuals, through criminal records checks and/or barred list checks, who may be unsuitable to undertake ‘[regulated work](https://www.mygov.scot/pvg-scheme/types-of-work-covered-by-pvg)’. 2. to ensure that Barnardo’s abides by the obligations of Disclosure Scotland and the relevant laws for handling, checking and retaining criminal record disclosure information. 3. to ensure that Barnardo’s complies with the spirit and requirements of the Rehabilitation of Offenders Act 1974 (Exclusions and Exceptions) (Scotland) Order 2003 and ensure that applicants are treated fairly when considering information disclosed. 4. to ensure that Barnardo’s retains its status as a Registered Body. | | | |
| 1. **Policy and Procedure** | | | |
| **1.The Purpose and Levels of Disclosure Checks**  A disclosure check forms one part of our wider safeguarding processes. It helps us determine whether a person is a suitable candidate for a particular role by providing information about an individual’s criminal record history.  Disclosure Scotland manages the Protecting Vulnerable Groups ([PVG) scheme](https://www.mygov.scot/pvg-scheme). This is a membership scheme for people doing ‘regulated work’ with children or protected adults.  Anyone who applies for ‘[regulated work’](#regulated_work) (whether paid or unpaid) with children and/or protected adults must become a member of the PVG scheme. Where an individual carries out regulated work for both children and protected adults, they will need to be members of the scheme in relation to both groups.  Under the PVG scheme employers can check to verify that an individual is a PVG scheme member and not barred from working with children and/or protected adults. Members’ records are continuously updated with information relating to criminal convictions and relevant non-conviction information held by police.  Disclosure Scotland keeps a list of people unsuitable to do [regulated work](https://www.mygov.scot/pvg-scheme/types-of-work-covered-by-pvg) with children and a list of people unsuitable to work with protected adults  **1.1      Types of Disclosure**  There are [4 types of checks](https://www.mygov.scot/disclosure-types/) provided by Disclosure Scotland and the type of disclosure required depends on the voluntary or paid work being carried out:   1. **Basic** – contains unspent convictions under the Rehabilitation of Offenders Act (ROA) 1974. 2. **Standard** – contains criminal history information held on the Police National Computer (PNC) including unspent convictions, [relevant spent convictions](https://www.mygov.scot/convictions-higher-level-disclosures/spent-convictions), unspent cautions and whether the individual is included on the Sex Offenders Register. 3. **Enhanced** – contains criminal record information held on the PNC, including unspent convictions, [relevant spent convictions](https://www.mygov.scot/convictions-higher-level-disclosures/spent-convictions), unspent cautions, whether the individual is included on the Sex Offenders Register; other relevant information, which may include non-conviction information provided by the relevant police forces; and inclusion on children’s or adults' barred lists if it is relevant to the job. 4. **PVG -** A PVG disclosure shows unspent and certain [spent convictions](https://www.mygov.scot/convictions-higher-level-disclosures/spent-convictions). It also shows any non-conviction information that the police or other government bodies think is relevant. Disclosure Scotland continuously monitors PVG members' records. It checks for convictions or other vetting information that might affect an individual’s suitability to work with vulnerable groups.   There's [guidance on Youtube](https://youtu.be/O6q37vpSweg) issued by Disclosure Scotland that explains the different types of disclosure.  The Protection of Vulnerable Groups (Scotland) Act 2007 provides for the issue of three disclosure records as follows:  **PVG Scheme Record:**   * contains unspent and certain [spent convictions](https://www.mygov.scot/convictions-higher-level-disclosures/spent-convictions); * shows whether the individual is included on the Sex Offenders Register; * contains other relevant information, which may include non-conviction information that the police or other government bodies think is relevant; * shows basic PVG membership information – the type/s of regulated work in respect of which the individual is a PVG scheme member (thereby confirming that the individual is not barred from regulated work of that type); and * states if the individual is under [consideration for listing](https://www.mygov.scot/pvg-scheme-lists/consideration-for-listing) for the type/s of regulated work. * Disclosure Scotland continuously monitors PVG members' records.   **PVG Scheme Record Update (also known as Short Scheme Record):**   * shows basic PVG membership information - the type/s of regulated work in respect of which the individual is a PVG scheme member (thereby confirming that the individual is not barred from regulated work of that type); * states if the individual is under [consideration for listing](https://www.mygov.scot/pvg-scheme-lists/consideration-for-listing) for the type/s of regulated work; * includes the date the member’s Record was last disclosed and a statement as to whether that Record contained vetting information; * includes either a statement confirming that no new vetting information has been added since the Record was last disclosed or the date of each addition; * includes either a statement confirming that no vetting information has been deleted since the Record was last disclosed or the date of each deletion. * It does not include any vetting information.   **PVG Statement of Scheme Membership:**   * shows basic PVG membership information - the type/s of regulated work in respect of which the individual is a PVG scheme member (thereby confirming that the individual is not barred from regulated work of that type); * states if the individual is under [consideration for listing](https://www.mygov.scot/pvg-scheme-lists/consideration-for-listing) for the type/s of regulated work. * It contains no vetting information.   **1.2      Which Disclosure is required?**  There is no minimum age requirement for a disclosure check through Disclosure Scotland. Parental consent is advised if a disclosure is sought for individuals less than 14 years of age.   1. **Basic Disclosure –** anyone can apply for a basic disclosure. 2. **Standard Disclosure –** is for roles such as solicitors, accountants, or roles involved in the provision of a care service (and do not meet the definition under regulated work) 3. **Enhanced Disclosure (with or without children and/or adults list check) –** Disclosure Scotland will only process applications for enhanced disclosures for a limited number of purposes not involving regulated work, such as checking if people are suitable for the purposes of adoption or people applying for various gaming and lottery licences. 4. **PVG Scheme Record –** is used by **Barnardo’s** to determine whether an individual is eligible to undertake ‘regulated work’ with children and/or protected adults. Once someone is a member of the PVG scheme they remain so until such a time as they are removed by the organisation or themselves due to leaving ‘regulated work’. Therefore Disclosure Scotland will continue to check the individuals’ suitability to continue working with children or protected adults while they remain a member. 5. **PVG Scheme Record Update –** is used for checking existing PVG members who start a new job or voluntary role which involves ‘regulated work’, but still working with the same vulnerable group.   **1.3       What is Regulated Work?** This [PVG Eligibility video](https://www.youtube.com/watch?v=b2OSCaXhk50) has been produced by the Scottish Government to help employers to decide whether a particular role is ‘regulated work’.  Regulated work is defined by the following principles:  It has to be work with either children and/or protected adults.  The work has to include:   * A particular type of activity, such as caring for or teaching a child or protected adult. * Work in a particular establishment, such as a school or a care home, which involves contact with children or protected adults. * Holding one of the specified positions, such as member of a children’s panel or chief social work officer.   Examples include:   * jobs with caring responsibilities * teaching or supervising children or protected adults * providing personal services to children or protected adults * working directly with children or protected adults   Then there are further tests which narrow this definition of regulated work.   1. Doing certain activities or working in particular establishments must be part of an individual’s normal duties, i.e. it should be something the employer would expect them to do as part of their job description. 2. The activities are only regulated work where delivering them to children or protected adults is not incidental to delivering them to the general public, i.e. the activity should be aimed at the client group, or there should be a reasonable supposition that a large number of children or adults will take part in the activity. 3. Work in a defined establishment is only regulated work if something permitted or required by that work gives the worker the possibility for unsupervised contact with a child or protected adult.   This definition and the tests capture the type of work in which a person is responsible for the welfare and wellbeing of a child or protected adults, or where there is a level of trust between the worker and the child or protected adult.  It is intended to exclude positions where there is no possibility for contact or trust, or where contact is only fleeting.  The full details are set out in the Protection of Vulnerable Groups (Scotland) Act 2007, [Schedule 2 (Children)](http://www.legislation.gov.uk/asp/2007/14/schedule/2) and [Schedule 3 (Protected Adults)](http://www.legislation.gov.uk/asp/2007/14/schedule/3).  A person who is barred from working, or deemed unsuitable to work, with children or protected adults will be breaking the law if they work or volunteer, or try to work or volunteer with those groups.  An organisation that knowingly employs or engages (paid or unpaid) a barred, or unsuitable, individual to work with children or protected adults will also be breaking the law.  **2. Disclosure process in Recruitment**  If the role is eligible for an enhanced disclosure check any offer of employment/as and when work/volunteering must be made conditional on the receipt of a satisfactory disclosure check.  With regards to colleagues employed by Barnardo’s, apprentices, volunteers (including student placements and interns), as and when Workers, Casual Workers and Self-Employed Consultants, it is Barnardo’s responsibility to ensure that up-to-date checks are carried out as appropriate for the role.  Agency workers are employed by the agency and therefore the agency as the employer will be responsible for undertaking the relevant check. However, the line manager must ensure that the agency provides us with written confirmation that the individual has the appropriate type of satisfactory disclosure check in place. The agency must also confirm they will advise us immediately if they are informed by Disclosure Scotland of any change to that status. Please refer to the agency worker guidance for further details of checks and vetting for agency workers (see [contingent worker recruitment).](https://inside.barnardos.org.uk/people-and-culture/recruiting-employees-and-apprentices/contingent-worker-recruitment)  No-one should start undertaking any regulated work until we have had receipt of the satisfactory check except in limited circumstances following a risk assessment (see pre-disclosure risk assessment, located on Inside.Barnardo’s) and Director approval. All paperwork and information relating to the disclosure process must be handled and stored in accordance with the Storage, Handling, Retention and Disposal of Disclosure information policy - Scotland (see [Criminal records disclosure policy (Scotland)](https://inside.barnardos.org.uk/criminal-records-disclosure-policy-scotland) for further details). The results of the disclosure check must be recorded on D365/Vol1.  **3. Retail Safeguarding** To further strengthen our safeguarding practices in Retail, basic disclosure checks will be requested for all retail staff and key holder volunteers who give their consent.   Whilst new starters in Retail may commence work/volunteering pending the outcome of a basic disclosure check, a [risk assessment](https://inside.barnardos.org.uk/people-and-culture/recruiting-employees-and-apprentices/recruitment-assessing-potential) will be completed to determine this (see Inside.Barnardo’s).  In the event that consent is not provided for Barnardo’s to obtain basic disclosure check, a [risk assessment](https://inside.barnardos.org.uk/people-and-culture/recruiting-employees-and-apprentices/recruitment-assessing-potential) will be completed (see Inside.Barnardo’s).  If a criminal conviction(s) is disclosed, a [risk assessment](https://inside.barnardos.org.uk/people-and-culture/recruiting-employees-and-apprentices/recruitment-assessing-potential) following the disclosure of convictions’ must be completed and a decision made and recorded on whether or not to continue with the recruitment process. For existing staff and volunteers an assessment will be made of the implications (if any) for their continued employment/volunteering in the role.   As part of our wider safeguarding practices, we undertake bi-annual risk assessments and provide appropriate safeguarding training for all store managers.  **4. Repeat disclosure checks**  Once someone is a PVG scheme member Disclosure Scotland keeps checking their suitability to continue working with children or protected adults. If they find new information which means someone might have become unsuitable to work with children or protected adults, they will inform Barnardo’s. Repeat disclosure checks are therefore **not** required on PVG scheme members working in regulated work. However, colleagues changing jobs or volunteers changing roles where the new role requires a disclosure check and/or involves working with a different vulnerable group e.g., moving from a role outside Children’s Services that did not involve working with children/protected adults, to a new role that now includes ‘regulated work’, will require a PVG Scheme Record disclosure check.  Repeat basic disclosure checks for all retail colleagues and key holder volunteers (who give their consent) will be undertaken periodically and/or at every 3 years while they remain in employment/volunteering.  The results of the check must be recorded on D365/Vol1. All information must be handled and stored in accordance with the Storage, Handling, Retention and Disposal of Disclosure information policy - Scotland (see [Criminal records disclosure policy (Scotland)](https://inside.barnardos.org.uk/criminal-records-disclosure-policy-scotland) for further details.  **5. Identity Verification**  Obtaining a disclosure check requires applicants to provide valid, current, original documents, to prove their identity and to verify their date of birth and address history in accordance with current Disclosure Scotland guidance.  The hiring manager is responsible for verifying the person’s ID. In the recruitment process this will take the form of a passport or other original ID documentation which was presented and copied during the selection process to prove their eligibility to work in the UK.  **5.1** **Overseas applicants and UK applicants who lived abroad**  Disclosure Scotland can only provide criminal history information relating to the UK. If the applicant is from overseas, or has lived or worked outside of the UK for a period of more than 6 months in the last 5 years, they will need to obtain a criminal records check, or ‘Certificate of Good Character (CGC)’, from the relevant country/countries to supplement the criminal records checking process.  The hiring manager is responsible for determining whether a CGC is required and asking the individual to obtain the CGC.  In some cases it may be possible for the individual to get such a check through the relevant embassy in the UK. The process for obtaining CGCs varies between countries and details can be found on the [gov.uk website](https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants).  The hiring manager has responsibility for checking whether returned CGCs are satisfactory, seeking advice from the People Team where necessary. If criminal convictions are disclosed on a CGC, a ‘Risk Assessment Following the Disclosure of Convictions’ must be completed and a decision must be made and recorded on whether or not to continue with the recruitment process. (see [Risk Assessment for considering criminal record and related disclosures](https://inside.barnardos.org.uk/people-and-culture/recruiting-employees-and-apprentices/recruitment-assessing-potential)).  Where it is not possible to obtain such checks, e.g., because the country in question won’t co-operate, then a thorough risk assessment must be carried out by the hiring manager.  The appropriate Director will then review the outcome of the risk assessment and will take the decision on whether or not, to continue with the recruitment process.  It is important to still request a check for an individual with no, or very little, address history in the UK, as the individual will still need to become a Scheme member. This will ensure they are subject to continuous updating that will provide reassurance that the individual is not barred from regulated work and ensure we are notified if the barred status changes.  **6. Management and Use of disclosure information**  Barnardo’s fully complies with the [Disclosure Scotland Code of Practice - mygov.scot](https://www.mygov.scot/disclosure-code-of-practice) on the secure handling, use, storage and retention of disclosure information.   In summary Barnardo’s will:   * Store all disclosure information securely * Only retain disclosure information, its content or any representation of the same in any format for no longer than is necessary. * Ensure that no reproductions of the Disclosure or its content are made, including photocopies or scanned images. * Only share Disclosure information with relevant persons in the course of their specific duties relevant to recruitment and vetting processes * Dispose of Disclosure information in a secure manner * Ensure that any relevant information disclosed to Barnardo’s that is not included on the certificate is not revealed to the Disclosure applicant. * Ensure that we comply Disclosure Scotland’s guidance on the portability of disclosures and their contents   A full policy statement is contained in the Storage, Handling, Retention and Disposal of Disclosure information policy - Scotland (see [Criminal records disclosure policy (Scotland)](https://inside.barnardos.org.uk/criminal-records-disclosure-policy-scotland) for further details.  **7. Policy on Ex-Offenders**  Barnardo’s will not unfairly discriminate against the subject of Disclosure Information on the basis of conviction or other details revealed.  Barnardo’s has a policy statement on the [recruitment of ex-offenders](https://inside.barnardos.org.uk/people-and-culture/recruiting-employees-and-apprentices/recruitment-ex-offenders-policy) which is available to all job applicants through the recruitment website or in hard copy on request.  **8. Referrals**  The Protection of Vulnerable Groups (Scotland) Act 2007 places a duty on organisations and personnel suppliers to make a referral when certain criteria are met. Broadly speaking, the criteria are that:   1. an individual doing regulated work has done something to harm a child or protected adult, and 2. the impact is so serious that the organisation has (or would) permanently remove the individual from regulated work.   Barnardo’s has a duty to report harmful behaviour to Disclosure Scotland. For Barnardo’s policy on referrals to Disclosure Scotland see **Appendix A** below. Further information on referrals to the relevant disclosure bodies and other required agencies (e.g. Scottish Social Services Council) can be found in the [Safeguarding referral guidance.](https://inside.barnardos.org.uk/safeguarding-referral-guidance) | | | |
| 1. **Scope** | | | |
| This policy and procedure applies to all successful candidates as part of pre-employment/pre-engagement checks and all roles (paid and unpaid) undertaking ‘regulated work’ for Barnardo’s within **Scotland** and therefore who are subject to a Disclosure Scotland or PVG check.  Criminal Record checks in **England and Wales** and **Northern Ireland** are governed by The Disclosure and Barring Service (DBS) and Access Northern Ireland respectively so the rules and definitions are slightly different. There are therefore separate policies on checks in England and Wales and in Northern Ireland (see [Criminal records disclosure checks)](https://inside.barnardos.org.uk/safeguarding/criminal-records-disclosure-checks) | | | |
| 1. **Definitions and Key Concepts** | | | |
| **Protected Adult -** Is an individual aged 16 or over who is in receipt of one or more type of care, health or welfare service.  **Children** - Anyone under 18 years old. An individual aged 16 or 17 in receipt of one or more type of care will be protected under both categories.  **The Protection of Vulnerable Groups (PVG) Scheme -** The PVG scheme is managed and delivered through Disclosure Scotland. It ensures that those who either have regular contact with vulnerable groups through the workplace, or who are otherwise in regulated work; do not have a history of inappropriate behaviour. It excludes people who are known to be unsuitable, on the basis of past behaviour, from working with children and/or protected adults and identifies those who become unsuitable while in the workplace. Disclosure Scotland keeps a list of individuals who are considered to be unsuitable to work with children (“the children’s list) and a list of those who are barred from working with protected adults (“the adults’ list”).  **Disclosure Scotland** – Executive Agency of the Scottish Government. Their core function is to provide criminal history information to organisations and potential employers.  **Regulated Work** – as defined in Protection of Vulnerable Groups (Scotland) Act 2007 and detailed in section 1.3. | | | |
| 1. **Roles and Responsibilities** | | | |
| **Line Managers/Hiring Managers** –  **People Teams/Recruitment Team/Volunteer Advisors-**  **People Strategy & Projects Team-** | | | Are responsible for deciding the required the level of disclosure check and ensuring the checks are carried out in accordance with this policy; seeking advice from the People Team (PT) on any aspect of the policy where needed.  Are responsible for the administration of the disclosure checking process and supporting managers to ensure required checks are carried out in accordance with this policy; and when it is necessary to make a referral to the relevant regulatory body/ies.  Are responsible for endeavouring to ensure compliance with legal and regulatory obligations; and keeping up-to-date with any Disclosure Scotland policy or procedural changes and updating this policy, and other associated forms or processes accordingly. |
| **6. Associated Legislation, Guidance, References and Documents  (all located on** [Inside Barnardo's](https://inside.barnardos.org.uk/) **unless otherwise stated)** | | | |
| * Recruitment and Selection Policy * Recruitment of ex-offenders * Volunteer Procedures (available on Vol 1) * Safeguarding Code of Conduct * Agency Worker Welcome Pack (see [Contingent worker recruitment)](https://inside.barnardos.org.uk/people-and-culture/recruiting-employees-and-apprentices/contingent-worker-recruitment) * External Consultants Questionnaire (ECQ see [Contingent worker recruitment)](https://inside.barnardos.org.uk/people-and-culture/recruiting-employees-and-apprentices/contingent-worker-recruitment) * Safeguarding Referral Guidance * [Risk Assessment for considering criminal record and related disclosures](https://inside.barnardos.org.uk/people-and-culture/recruiting-employees-and-apprentices/recruitment-assessing-potential) | | | |
| **7. Compliance and Oversight** | | | |
| * Recruitment Team and People Teams monitoring of general adherence to policy. * Feedback from UNISON and Barnardo’s EDI Networks. * Audits.   In addition to the compliance and oversight arrangements set out under Roles and Responsibilities, the following applies:   * The Risk Owner will ensure that management information demonstrating adherence to and compliance with this Policy is produced and provided to relevant parties as required and on request complete a business self-assessment. * The Audit and Assurance Team will periodically and independently review adherence to and compliance with this Policy and associated procedures and processes across the Charity in line with their approved audit and inspection plans. | | | |
| **8. Document History** | | | |
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| **Appendix A** | | | |
| **POLICY ON REFERRALS TO DISCLOSURE SCOTLAND**  **Barnardo’s Policy Statement**  **Introduction**  1. As a provider of “regulated work”, as defined by Schedules 2 and 3 of the Protection of Vulnerable Groups (Scotland) Act 2007, Barnardo’s are legally obliged in certain circumstances (known as referral grounds) to submit referrals on individuals to Disclosure Scotland. The legal requirement to refer is contained with section 9 of the Protection of Vulnerable Groups (Scotland) Act 2007.  2. The obligation to refer to Disclosure Scotland exists irrespective of involvement of other agencies – e.g. police, regulatory bodies, local authorities etc.  **Types of conduct**  3. The obligation to refer arises when an individual in a “regulated work” role (i.e. the position is eligible for a PVG check) is responsible for one of the following:   * harming a child or protected adult * placing a child or protected adult at risk of harm * inappropriate behaviour involving pornography * inappropriate behaviour of a sexual nature involving a child or protected adult * giving inappropriate medical treatment to a child or protected adult   **Harm**  4. “Harm” can include:   * physical harm (including assault or inappropriate restraints); * psychological/emotional harm (for example, placing a child/protected adults in a state of fear, alarm or distress) ; * “damage to property, rights or interests”, such as theft, fraud, embezzlement or extortion * attempts to harm * trying to make others cause harm * encouraging someone to self harm   5. Placing at “risk of harm” is a wide ranging category but may include behaviour or incompetence that may cause someone to be harmed (even if unintentional and/or where harm does not actually occur).  **6. The above list of types of conduct is not exhaustive.**  7. The conduct does not need to have happened in the workplace but must be something the organisation becomes aware of that subsequently leads to the below action or equivalent.  **When to refer to Disclosure Scotland**  8. A referral to Disclosure Scotland outlining the conduct need only be done if the behaviour meant that the staff member or volunteer involved:   * Was dismissed as a result * Would have been dismissed but left before they could be – for example, resigning or making no further contact with the organisation immediately after the incident(s) or after starting but not concluding a disciplinary process or when an individual’s probation or fixed term contract is not extended because of a type of conduct outlined above. * Was transferred permanently (not temporarily while under investigation) from regulated work with children/protected adults to a role within the organisation that does not involve regulated work with those groups.   9. The referral must be made within three months of the date of decision of Barnardo’s to either dismiss/permanently remove the individual from “regulated work” or the date that the individual would have been permanently removed had they not otherwise or already left.  10. The three month period to submit referrals to Disclosure Scotland is a statutory requirement, irrespective of any associated dismissal appeals or appeal periods etc. Even where an individual appeals against a decision to permanently remove from regulated work, the three month period begins on the date of the decision to either dismiss or permanently remove from regulated work.  11. The type of conduct committed by the individual must be in relation to the group that the individual is in regulated work with, whether that regulated work is for Barnardo’s or another organisation – for example, if an individual is permanently removed from post due to assaulting a child, but they are only in regulated work with protected adults, it is not possible under current legislation for the organisation to refer that individual to Disclosure Scotland.  **How to refer an individual to Disclosure Scotland**  12. An employer referral form is available on the Disclosure Scotland website, which asks for the information on the individual’s identity, type of “regulated work” involved in for Barnardo’s, PVG Scheme number, information on the harmful behaviour and details (with documentation) relevant to the investigation carried out by Barnardo’s and the outcome.  13. The referral should not identify any children or protected adults by name (for example, victims and witnesses) and should use a coded reference (e.g. child A, age 12).  14. The completed referral form and documentation can be submitted via e-mail to [pucorrespondence@disclosurescotland.gsi.gov.uk](mailto:pucorrespondence@disclosurescotland.gsi.gov.uk) or can be printed out and posted to the address provided in the form.  **Contacts**  15. More information on this can be found on the Disclosure Scotland website at [Making a referral to Disclosure Scotland - mygov.scot](https://www.mygov.scot/pvg-referrals) or by contacting Disclosure Scotland on 0300 0200 040 or via email to [response@disclosurescotland.gov.scot](mailto:response@disclosurescotland.gov.scot)  16. The form recommended for completion to submit a referral can be found at <https://www.mygov.scot/pvg-referrals/>  17. The Protection Unit or Customer Engagement Team at Disclosure Scotland are available to provide advice on whether a specific situation means a referral must be submitted to Disclosure Scotland. | | | |