

Protection of Vulnerable Groups and the Disclosure of Criminal Information: A consultation on proposals for change

Respondent Information Form (RIF)



Please Note this form **must** be returned with your response to ensure that we handle your response appropriately.

1. Name/Organisation Name

The Salvation Army

Title Mr Ms Mrs Miss Dr

Please tick as appropriate (if completing electronically, double click on box and select default value as 'checked')

Surname

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3. Permissions - I am responding as...

Individual / **Group/Organisation**

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate

Yes No

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

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Are you content for your **response** to be made available?

Please tick as appropriate

Yes **No**

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate **Yes** **No**

CONSULTATION RESPONSE



The Salvation Army Scotland is grateful for the opportunity to respond to this consultation.

Question 1: Do you agree that reducing the disclosure products will simplify the system?
Yes **No**

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

Level 1 Disclosures

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

Basic **Level 1** **Other (please state)**

Question 3: As an applicant, do you have any concerns with this approach?
Yes **No**

Question 4: Which option do you prefer? And why?

We believe that option 2 (reduced fee for subsequent applications) would help people in temporary work and also reduce overall processing time.

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

Yes **No**

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

Any move to a purely digital system would disadvantage people with poor computer skills, anyone on low income without computer access, people with physical disabilities, learning difficulties or mental health issues. A paper-based alternative should still be made available. For those requiring assistance, it is easier to work with a paper form. This also allows time to gather additional information if required.

Questions 7: Do you agree with our proposed fee for this service? [Apostille]

Yes **No**

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

Level 2 Disclosures

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

Yes **No**

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

Currently most of the workers within our Homelessness Services centres who do not require PVG have a standard disclosure. These workers are not included in Annex A for Level 2 Disclosure under the proposed scheme.

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

Yes **No**

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

We have no comments on questions 10-14.

Foster Carers/Kinship Carers

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

Yes No

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

Yes No

Question 12: Do you agree with this proposal?

Yes No

Question 13: Do you agree with this proposal?

Yes No

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

Independent Schools

Question 14: Do you believe that this is the correct approach going forward?

Yes No

Content of Level 2 Disclosure

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

Option 1 Option 2a Option 2b

The majority of applicants who might come under the barred list or prescribed orders would require PVG membership. In other situations, the Other Relevant information would be sufficient to allow a suitable risk assessment to be made.

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

Option 1 Option 2

The Salvation Army carries out periodic checks, so the option to have an account would save both time and money.

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

Yes No

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

Experience in other areas of the UK suggests that, on the whole, a digital service will be easier and quicker to use, particularly if online identity verification is implemented. However, we would have concerns regarding accessibility for many of our service users. For example, whilst in a residential centre, users of our homelessness service would have access and support to use the internet for housing and job applications. However, once they move on, that access and support may not be available,

creating a barrier to seeking work requiring a Disclosure or PVG membership. In addition, some may not have paperwork or online registrations to fulfil the requirements of identity checks.

Similarly, there may be people with physical disabilities, mental health issues, learning difficulties, or lack of internet access due to low income, who may prefer to use paper forms. Therefore other means of applying should be available in the interests of equality and inclusion.

Regarding the ownership of data by an individual, this is generally a good idea. However, it takes away control of the process from an employer, who would need to request the employee obtain a new disclosure. Experience shows that, even with control of the process being with the employer, it can take some time to obtain an updated disclosure. This may become more difficult with the proposed system.

Reforming policy of PVG

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

Initially, the mandatory system should be brought in only for new applications, with scheme updates for existing members continuing as before. Perhaps a few larger organisations, including umbrella bodies, should pilot the scheme for six months. Once there is confidence that the system works, and has sufficient capacity, new applications could be added.

After a certain time, perhaps 12 months, scheme update requests could be used to trigger membership of the new scheme. After a further set time (perhaps a total of 3 years to coincide with common update cycles), Disclosure Scotland should contact any remaining members of the old scheme inviting them to apply to join the new scheme within a set time (3 months), thereafter cancelling membership.

Note that, in order for a mandatory scheme to work for both employer and employee, all organisations registered against a PVG scheme member should be notified when membership is due for renewal. This will be particularly important for two reasons: the new scheme means that membership could already be active prior to joining a specific organisation, so may not fit with the organisation's existing update cycle; if different durations of membership are permitted, it will become more complicated, particularly for charities with small staff teams, for organisations to keep track of renewal dates.

(One solution to this problem is that employed currently by The Salvation Army: a quarterly sweep of the disclosure database to highlight disclosures requiring renewal and PVG requiring a scheme update. This also gives opportunity to remove workers who are no longer active)

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

Yes **No**

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

Yes **No**

On the whole we have been happy with “Regulated Work”. Most of the roles that we believe need to be covered by PVG have been accommodated within the current framework by clarifying the role description. Our main areas of concern have been around interpretations of marginal situations, for example where the definition of a role by its nature puts workers or volunteers on occasion into a situation that, if the role were full-time, would require registration, but Disclosure Scotland rules that this is “incidental”.

In contrast, the new system simply lists role titles with no clarification of what the role entails. Many of the roles within churches that cater for children or protected adults have no obvious equivalent outside the church, and the variety of work we carry out with children is not reflected in the proposed list of roles.

It will probably be necessary for us to rewrite role descriptions to match the new scheme. Will these have to be submitted to Disclosure Scotland for approval? This would be a huge task both for the organisations involved and for Disclosure Scotland. There may also be a long period of negotiation for marginal roles.

We would therefore ask that the current scheme of “Regulated Work” be continued, with some flexibility around the definition of “incidental”. We believe that other elements of the proposed system, such as time-limited membership, would more than offset any slight increase in numbers for the additional roles we would want covered.

If the move to “Protected Roles” goes ahead, we would ask that there be a criteria-based tool that would allow for inclusion of any roles not specifically listed, and for flexibility with new roles that are not envisaged within the current schedule.

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?

Yes **No**

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

There is no provision in Annex B for many of the roles within church and faith groups that are currently covered by PVG. By the very nature of a church or faith group, leaders, employees, volunteers and even members can find themselves in a position of trust and authority over individuals with a variety of needs which could make them vulnerable to abuse. For example, residents within our centres for people experiencing homelessness.

The following are some of the most important examples of missing roles:

Minister of Religion (or Church Leader): Salvation Army officers and other church leaders are not covered by any role listed in Annex B, yet most of them will regularly come into potentially unsupervised contact with children or protected adults.

Children’s Worker or Youth Worker: we have many groups for young people of all ages. Some of the leaders are paid, whilst other leaders and most workers are volunteers. The volunteers could possibly be classed as youth/children’s club

volunteer (no. 3 under volunteering) but the only category open to paid workers is under Social Care/Care, which is inappropriate for a church setting.

Volunteer support worker: We currently have various volunteer roles at drop-in centres or on outreach projects, operated from our church buildings, which would not necessarily be covered by the new schedule.

Regional Specialists: We have a small team of specialists who work out of our Service Centre in Glasgow and who travel to lead or support work with children and adults all over Scotland. Most of them are currently members of the PVG scheme for either children or protected adults. There is no place for them in Annex B.

Befriender: We have a variety of roles that were previously listed under Befriender, in which volunteers or paid staff would visit vulnerable adults in their homes. There is no obvious place to include these in Annex B.

Programme Assistant: This category currently covers various posts such as Community Development Worker, which involves setting up and running programmes for engagement with a variety of protected groups and assistant roles to church leaders, which often require the worker to oversee activities in place of the church leader. There is no place for them in Annex B.

Concierge: By the nature of their role, a concierge in one of our residential homelessness centres may have unsupervised access to service users and their rooms, particularly during a night shift where the concierge may be the only staff member on the premises. Overnight access is not incidental, since they often have to respond to incidents that occur. We would also point out that service users do not make the fine distinctions between roles of support, concierge and cleaning staff which are implicit in the definition of “incidental”. Because these people work for The Salvation Army, there is an implicit level of trust which is potentially open to abuse. Hence we would argue that a concierge in a residential setting should be entitled to PVG membership.

In meetings between church Safeguarding representatives and Disclosure Scotland staff, a variety of roles have been identified that do not readily fit the proposed list of roles. There is also an implicit level of trust afforded, not just to paid staff or formal volunteers, but even to members of churches, which creates opportunities for grooming. Whilst The Salvation Army, in common with other churches and faith groups, has rigorous Safeguarding policies, including vetting and training for all staff and volunteers working with children or protected adults, and annual information sessions for all members, we cannot be sure of the integrity of everyone who identifies with our church.

Therefore we would suggest that a Faith Groups category should be added, or possibly Faith and Community Groups, which would replace and expand on the proposed Volunteering category, to ensure that at least all roles covered under the current system are carried forward into the new scheme, and to minimise as far as possible the risks to protected groups. We suggest that a formal meeting should take place between Disclosure Scotland and church Safeguarding representatives to create a comprehensive, mutually agreed list of Protected Roles for this category.

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

The key task of any system of Disclosure should be the Safeguarding of Children and Vulnerable Adults. Therefore any role that opens the potential for grooming or abuse should be considered for membership. The proposals for time-limited membership will provide sufficient protection against an unlimited growth in members and the consequent waste of resources.

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?

No comment

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?

We would highlight the same roles as at question 22a. Should these roles not be incorporated in the PVG scheme, we would ask that they be eligible for Level 2 Disclosure.

Volunteer Children's Worker or Youth Worker

Volunteer support worker (drop-in and outreach projects)

Regional Specialists (working with protected groups)

Befriender (home visits)

Programme Assistant (includes Community Development Workers and assistants to church leaders)

Concierge (homelessness services)

Question 26: Are there any services that should be added, or are there any services that should be removed?

Yes **No**

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

Question 27: Is this appropriate? [Front-line "caring" staff is main category for PVG]

Yes **No**

Question 28: Do you agree with this approach? [Line manager also]

Yes **No**

Question 29: Do you think these are the correct facilities, or should any be added or removed? [Care home or residential establishment]

Yes **No**

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

Many churches run drop-ins for homeless people and other groups, which will not be covered under the PVG scheme unless they are on contract to the local authority. Some are overseen by Salvation Army Officers (who, we argue, should be added to the list of roles), but others may be run by volunteers who may have no other reason for joining the PVG scheme.

Question 30: Do you think this approach is clear and helpful? [Incidental Contact]

Yes No

Whilst we understand the reasons behind this exclusion on the grounds of contact being incidental, and support it for roles where the main contacts are with members of the public, for reasons given elsewhere, we would consider it would lead to increased risk in settings such as our homelessness centres or drop-in sessions at church buildings.

Question 31: Do you think that list of positions is correct? [Additional roles]

Yes No

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

Time limits

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

a) 5 years

b) 3 years

c) 1 year

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

Yes No

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

Yes No

Fees and Delivery

Question 35: Do you agree with these proposals? [Registered body fees]

Yes No

Question 36: What is your preferred option?

Option 1 Option 2 Option 3

However, we believe that an option for 1 year membership should be offered, both for people who may take a short-term contract, and for those who may be coming off benefits into work, for whom the fee of £65 for five years may be too much in one payment. Options could be made available via a drop-down menu.

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

Yes No

However, telephone support should still be available for more complex queries.

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

Yes No

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

Yes No

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

Secure credit or debit card payments.

Transitional arrangements

*Question 40: Do you have any proposals on how the transitional arrangements should work?
Please see our response to question 19*

Volunteer Checks

Question 41: Should volunteers continue to receive free membership?

Yes **No**

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

Yes **No**

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?

Yes **No**

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

Charitable registration with OSCR should be sufficient.

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?

Yes **No**

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?

Yes **No**

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?

Yes **No**

Ending the necessity for court referrals to Disclosure Scotland

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

Yes **No**

Question 47: Are there offences missing from the Automatic Listing Order that you think should be included? <http://www.legislation.gov.uk/ssi/2010/241/contents/made>

Yes **No**

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

Police forces

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

Yes No

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?

Yes No

Local Authorities / Health and Social Care Partnerships

Question 50: Do you think this proposal closes the safeguarding gap in terms of self-directed support?

Yes No

Power to make a referral – regulatory organisations

Question 51: Do you think that this list of regulatory organisations should be amended?

Yes No

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

In view of recent revelations from the Aid sector, perhaps NGOs and faith groups should be allowed to make a referral.

Persons under consideration for listing – new restriction imposable by Scottish Ministers

Question 53: Do you agree with the proposal to provide Disclosure Scotland with powers to impose standard conditions?

Yes No

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

a) 3 months

b) 6 months

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

If someone is under investigation having been referred to the police or Social Work, or if an employer is conducting a disciplinary investigation. In these situations there is sufficient evidence to warrant formal investigation, therefore it seems a proportionate response to set boundaries on the employee or volunteer's role. Once the investigation is complete, the person will either be reinstated fully to the role, or face disciplinary and possibly legal consequences, and the conditions may be lifted.

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?

Yes No

Applications for Removal from the List

Question 57: Do you agree the age threshold for the shorter prescribed period for a removal application to be made should be raised?

Yes No

Question 58: Which option do you prefer?

Option A Option B Option C

Extending the PVG Scheme to protect children and adults who come into contact with PVG Scheme members working overseas

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?

Yes No

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?

Yes No

Question 61: We are proposing that there should be criminal offences in relation to organisations that 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?

Yes No

Section 5 – Offence Lists and Removal of spent convictions from a disclosure

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

No

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.

No

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.

No

Question 65: Do you agree with the categorisation of the new offences?

Yes No

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

Reducing the disclosure periods for spent convictions

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?

Yes No

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?

Yes No

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

11 12 13 14 15

Removal of spent convictions from a disclosure

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

Yes No

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?

12 months

Question 71: Do you think any of the options set out above offer viable alternatives to an application to a Sheriff?

Yes No

Question 71a: If yes, which one?

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

Keep as it is.

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?

Yes No

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?

Yes No

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

Yes No

Disclosure provisions for 12 – 17 year old children

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?

Yes No

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

1. 12 – 14 years

- 2. 12 – 15 Years
- 3. 12 – 16 years
- 4. 12 – 17 years
- 5. 12 – 18 years
- 6. 12 – 21 years

Question 75b: Please tell us why you have selected an age range or given your answer. This aligns with the United Nations Convention on the Rights of the Child (UNCRC)

Question 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?

Yes No

or

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?

Yes No

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?

Yes No

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?

Yes No

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?

Yes No

Availability of all types of disclosures for under -16s

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

Yes No

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

When a person of this age is wanting to work or volunteer in a regulated activity or is living with unsupervised contact with a child/vulnerable person.

Registered persons and countersignatories for higher-level disclosure applications

[Minimum age 18 for registered persons and countersignatories

Question 83: Do you have any concerns with this proposal?

No

Self-directed support

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?

Yes **No**

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?

Private individuals – work with children and / or protected adults

In cases, where a private tutor is being engaged, the person offering the work can ask for a PVG statement of scheme membership if the work being done will fall within the scope of regulated work because it is within the activities set out in Part 2 of schedule 2 of the 2007 Act. But again, this means that no vetting information is provided to the prospective recruiter. Private tutors providing services to an adult cannot apply for PVG scheme membership as their work will not fall within the definition of regulated work.

Question 85: Do you think this approach is correct?

Yes **No**

Likewise with specialised interpreters whose assistance may be needed to allow a person to participate in day-to-day life. It is questionable whether this work is regulated work.

Question 86: Do you think that it should be?

Yes **No**

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

Yes **No**

Charity Trustees

[Allow charity working with both children and adults to register with DS]

Question 88: Do you agree that the law be changed to sort this anomaly?

Yes **No**

Notification requirements under Part 2 of the Sexual Offences Act 2003

Yes **No**

Additional Questions

Question 90: Please tell us about any potential impacts, either positive or negative; you feel the proposals in this consultation document may have on any particular groups of people?
We reiterate our response to Q22a:

There is no provision in Annex B for many of the roles within church and faith groups that are currently covered by PVG. By the very nature of a church or faith group, leaders, employees, volunteers and even members can find themselves in a position of trust and authority over individuals with a variety of needs which could make them vulnerable to abuse.

We would ask for the roles listed here to be added to Annex B.

Volunteer Children's Worker or Youth Worker

Volunteer support worker (drop-in and outreach projects)

Regional Specialists (working with protected groups)

Befriender (home visits)

Programme Assistant (includes Community Development Workers and assistants to church leaders)

Concierge (homelessness services)

We would seek a meeting with Disclosure Scotland and faith group and voluntary sector representatives to ensure that all areas have been fully explored.

Question 91: Please tell us what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups?

The proposals for review of spent convictions are good and will enable the rehabilitation of offenders.

Question 92: Please tell us about any potential impacts you think there may be to particular businesses or organisations?

Depending on the scheme chosen, there may be cost implications for organisations such as The Salvation Army which pay for disclosures for employees. Time and money will need to be spent reviewing and rewriting role descriptions.

As the proposals stand, there is the potential for some offenders to gain a position without a check, with as consequent risk to vulnerable Service Users.

Question 93: Please tell us about any potential impacts you think there may be to an individual's privacy?

The policy around questions 86 & 87 (arrangements for private services such as tutoring and interpreting) may have privacy implications for the individuals concerned.

Question 94: Please tell us about any potential impacts, either positive or negative; you feel the proposals in this consultation document may have on children?

The possibility that some roles, which are currently covered by PVG, may be excluded from the new scheme increases the potential risk to children.