

Education Services, City Chambers, 40 John Street, Glasgow G1 1JL

December 2018 Management Circular No. 42

То Heads of all Educational Establishments

# **Safer Selection Policy**

#### CONTEXT 1

Glasgow City Council has robust recruitment and selection policy and procedures in place to ensure the suitability of all employees by thorough and fair assessment prior to appointment. There is a full recruitment toolkit available which gives detailed information and guidance on this policy and procedure and this toolkit should be referred to together with this management circular. Section 4 of the toolkit provides specific guidance about employment checks.

Most posts within Education Services require employees to work with vulnerable groups, the purpose of this policy is to provide further information regarding the assessment of suitability of employees and potential employees for this type of work. Education Services is completely committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment, it is therefore essential to ensure that all employees working with vulnerable groups are appropriately assessed.

In February 2011 the Scottish Government introduced a new membership scheme to replace and improve upon the previous disclosure arrangements for people who work with vulnerable groups e.g. children and adults aged 16 or over who receive one or more type of health care or welfare service. The Protection of Vulnerable Groups (Scotland) Act 2007 creates the legislative framework for this new vetting and barring scheme for those working with children and protected adults in Scotland. Implementation of the scheme in Scotland will build on the experience of operating the Protection of Children Scotland Act 2003 and existing disclosure arrangements.

Whilst this legislation will be effective in supporting safe recruitment practice, safe recruitment is also about properly examining the competency, experience, qualifications and attitudes of potential employees in relation to work with children. It is therefore important to have a range of safe recruitment and selection practices in place.

Education Services is also fully committed to promoting diversity and equality in the workplace. This commitment must be reflected in safe recruitment policies and practice to ensure that all potential employees are treated fairly and with respect at all stages of the recruitment process. Measures aimed at preventing illegal working that directly affect recruitment and employment practices are set out in Appendix 2.

#### 2 SELECTION PROCESS

All applications will be scrutinised to ensure that they are fully and properly completed and that information throughout the application is consistent. Any gaps in employment will be identified and the candidate will be asked to explain these. A history of repeated changes in employment without any clear career or salary progression will be explored and verified.

For the purposes of checking identity, applicants will be asked to supply appropriate documentation. A full history in chronological order since leaving secondary, including periods of any post-secondary education or training and part-time voluntary work as well as full-time employment with start and end dates will be required and should be entered into the application form.

All candidates will be assessed equally against specified criteria without exception or variation, although candidates who declare that they are disabled will be guaranteed an interview for the post provided they meet the essential criteria. Assessment centres may be used as part of the selection process. A robust selection process will be put in place in order to test competencies particularly in relation to working with vulnerable groups.

Previous employers may be contacted to verify particular experience or qualifications before interview.

#### 3 DETERMINING THE CANDIDATES SUITABILITY

The selection panel must be satisfied regarding the candidates suitability prior to appointing them.

#### 4 EMPLOYMENT CHECKS

Carrying out employment checks before appointing a candidate is a vital part a robust recruitment and selection process. Education Services will always carry out all of the following checks on potential employees before they take up post.

Verification of Identity	All candidates offered a post
Minimum of two appropriate references	All external candidates offered a post
UK residence or permission to work in UK Criminal Convictions Declarations	All candidates selected for interview All candidates selected for interview - reviewed for successful candidate only
Overseas criminal record checks	Where relevant for candidates offered a post
GTCS Registration	All teachers at application stage
Protection of Vulnerable Groups Scheme	All employees, workers and volunteers undertaking Membership regulated work
Disclosure	Relevant positions not covered by Protection of Vulnerable Groups
SSSC Registration	All Child Development Officers and their managers/supervisors and, staff employed at the dance school residence, at application stage.

These checks will be carried out in compliance with relevant legislation e.g. Equalites Act, Data Protection Act, Rehabilitation of Offenders Act, Protection of Vulnerable Groups Act.

All checks will be carried out prior to employment. In some cases an offer of employment can be made subject to checks being carried out. However, any such offer must make it very clear that all checks must be carried out successfully before the offer of employment is confirmed.

#### 5 References

Requesting and properly following up references is one of the most vital safe recruitment tools. As well as confirming information given by the candidate they provide a valuable source of information on candidates' histories and performance in previous roles.

The purpose of seeking references is to obtain objective and factual information to support appointment decisions. The agreed policy and process for obtaining references is detailed at Appendix 1.

Where an individual is to be offered a post and is currently employed by Glasgow City Council then their personal file will be checked to verify information provided. The normal expiry and retention periods for disciplinary warnings should be observed except in cases of Child Protection.

#### 6 Eligibility to Work in the UK

Sections 15 - 26 of the Immigration, Asylum and Nationality Act 2006 require all employers to make sure that all employees have the legal right to work in the United Kingdom.

As part of the recruitment and selection process candidates invited for interview are issued with guidance explaining what original documentation they need to provide to prove they are eligible to work in the United Kingdom. This documentation will also be used to verify the employee's identity.

All appointments are based on suitability for the post. No prospective applicants will be discouraged or excluded, either directly or indirectly, for any reason. All applicants will be treated equally at every stage of the recruitment process. The process must remain consistent for all applicants.

Appendix 2 gives details on the processes involved in ensuring employees have the legal right to work in the United Kingdom. Further relevant information is contained within Glasgow City Council's document entitled Managing Diversity in the Workplace – Manager's Guide to Employing Foreign Workers.

The Chair of the recruitment panel is responsible for ensuring that the correct form and documentation are gathered at interview.

#### 7 Protection of Vulnerable Groups

The Protection of Vulnerable Groups (Scotland) Bill, which was introduced to the Scottish Parliament in September 2006 aims to stop people who are unsuitable from gaining access through work to children or protected adults. The Protection of Vulnerable Groups (Protection of Vulnerable Groups) membership scheme came into force in February 2011 and replaces the disclosure arrangements that had been in place since 2002.

The new Protection of Vulnerable Groups scheme is designed to strengthen the protection for vulnerable groups and reinforces Glasgow City Council's continuous drive towards improving child protection.

The Scheme will be managed and delivered by Disclosure Scotland. Membership of this scheme will be mandatory for all employees/workers and volunteers carrying out regulated work in GCC Education Services, as it is the only mechanism that enables employers to be sure that they are not employing a barred person. Glasgow City Council will be committing an offence if they permit someone who is barred to undertake regulated work with children and/or protected adults.

More details are attached at Appendix 3.

#### 8 Verification of Identity

Where documentation provided under 5 and 6 above does not fully verify identity, then further documentation may be required. Photographic evidence of identity and proof of current address may be required.

#### 9 Disclosure

The three types of disclosures under the 1997 Act are still available for positions not within the scope of the Protection of Vulnerable Groups Scheme. Enhanced disclosure will be used for any post identified as appropriate but unrelated to work with vulnerable groups.

#### 10 Registration

All teachers employed by Glasgow City Council must have appropriate registration with the General Teaching Council for Scotland. The registration number should be provided at application stage.

All managers/lead practitioners in day care of children services must be Scottish Social Services Council registered and all Child Development Officers, CDO Team Leaders and practitioners in day care of children services employed by Glasgow City Council must be registered with Scottish Social Services Council.

It is the responsibility of the individual to maintain their registration and is a condition of continued employment.

#### **11 Qualifications and Certification**

Where a particular qualification has been stipulated as a requirement for the job then evidence of the attainment of that qualification will be required prior to a successful candidate taking up post.

Candidates may be asked to confirm all qualifications they mention on their application form.

#### **12 Criminal Convictions Declaration Forms**

These forms may be less relevant when PVG membership is required, however they are part of the recruitment process. Candidates should bring the completed declaration form to interview in a sealed envelope and the Chair of the panel is responsible for gathering this information and ensuring it remains confidential. The envelope will be opened for the successful candidate only. If a relevant conviction is declared then a meeting should take place with the candidate prior to a post being offered. Managers should seek advice from the Education HR team.

Maureen McKenna Executive Director of Education

#### **References in Recruitment**

#### 1. WHO WILL REQUIRE A REFERENCE AND WHEN WILL IT BE REQUIRED?

References will be sought for the successful candidate only and no appointment will be confirmed without references being taken up. If an offer is made subject to satisfactory references then it must be clear that the decision whether or not the reference is satisfactory will be taken by Glasgow City Council, Education Services.

References will be used as an important tool to confirm information gained from the candidate during the selection process.

Any issues of concern may be raised and explored further with the referee and also with the candidate. Any concerns must be resolved satisfactorily before the person's appointment is confirmed.

Current employees may take up a new post without a reference being in place, however a reference will still be required prior to the post being confirmed.

#### 2. WHAT TYPE OF REFERENCE AND WHO WILL PROVIDE IT?

References will always be sought and obtained directly from the referee. References or testimonials provided by the candidate, or open references and testimonials, e.g. *"To Whom It May Concern"* will not be accepted.

References will be sought from previous employers who are in a position to comment upon suitability for the post. The last/current employer will always be contacted and the other reference should be provided from another employer where possible. Candidates should therefore ensure appropriate contact details are provided.

References should cover a minimum period of the last three years but five years is preferable.

Where it is impossible for a current or previous employer to provide a reference, e.g. if the company has closed down then personal references should be taken from reputable source. Where a manager is in any doubt he/she should contact the Education Services Human Resources for further advice..

Where a potential employee comes from full-time education and cannot provide an employment reference then a reference should be sought from the further education establishment. A further reference should be sought from a reputable source to comment upon the applicant's suitability to work with vulnerable groups.

Where a potential employee has worked long term for one employer then a further reference should be sought from a reputable source to comment upon the applicant's suitability to work with vulnerable groups.

For periods of self-employment, evidence should be obtained (e.g. from HM Revenue and Customs, bankers, accountants, solicitors, client references etc.) to confirm the individual's business was properly conducted and was terminated satisfactorily.

#### 3. WHAT INFORMATION MUST A REFERENCE CONTAIN?

A pro forma will be used for references. The purpose of this is to ensure that the correct information is obtained. References should contain objective verifiable information as far as possible, not subjective opinion. The referee will be informed that the reference they provide may be shared with the candidate. A reference will request information regarding:

- the referee's relationship with the candidate e.g. did they have a working relationship: if so what; how long has the referee known the candidate and in what capacity.
- the reference from the current or most recent employer must be signed by an appropriately senior member of the relevant organisation, e.g. not a former peer.
- the referee should be in a position to say that they are satisfied that the person has the ability and is suitable to undertake the job in question, and for specific comments about the applicant's suitability for the post.
- the reference should also comment upon the candidate's suitability to work with vulnerable people, and, if not, give specific details of the referee's concerns and the reasons why the referee believes the person might be unsuitable.
- the standard reference request will remind the referee that they have a responsibility to ensure that the reference is accurate and dependable and does not contain any material misstatement or omission; relevant factual content of the reference may be discussed with the applicant.

In addition to the above, the standard request addressed to a candidate's current employer, or a previous employer in work with vulnerable people, will also seek relevant information including:

• confirmation of details of the applicant's current post and recent absence record specific verifiable and relevant comments about the applicant's performance.

History and conduct;

- where disciplinary sanction is current, details of any disciplinary procedures the applicant has been subject to:
- details of any allegations or concerns that have been raised about the applicant that relate to the safety and welfare of service users or behaviour towards service users, and the outcome of those concerns e.g. whether the allegations or concerns were investigated, the conclusion reached, and how the matter was resolved.

Any information about past disciplinary action or allegations in relation to suitability to work with vulnerable groups will be considered in the circumstances of the individual case. Cases in which an issue was satisfactorily resolved some time ago or an allegation was determined to be unfounded or did not require formal disciplinary sanctions, and in which no further issues have been raised, are less likely to cause concern than more serious or recent concerns, or issues that were not resolved satisfactorily. A history of repeated concerns or allegations over time may be more likely to give cause for concern.

References will be checked to ensure that all specific questions have been answered satisfactorily. If all questions have not been answered or the reference is vague or unspecific, the referee will be telephoned and asked to provide written answers or amplification as appropriate. References must always be signed.

The information given on a reference will be compared with the application form to ensure that the information provided about the candidate and his/her previous employment by the referee is consistent with the information provided by the applicant on the form. Any discrepancy in the information will be taken up with the applicant.

### 4. WHEN WILL ADDITIONAL REFRENCES BE REQUIRED?

A minimum of two references is required for all external recruitment to Education Services. Where a teaching applicant has only been employed in one previous school, one reference from that school's Headteacher will be sufficient unless the teacher has other relevant work experience. Further references may be taken up wherever Education Services considers this to be necessary, usually where those received are lacking in detail and further enquiries have not succeeded in obtaining the necessary detail and if, for example:

- an employee has had more than two employers in the last three years;
- there are concerns about a candidate who suggests he/she has found himself/herself in the wrong job;
- he/she has had difficulties with a former manager;
- the candidate gives an unusual or inconsistent reason for leaving a job;
- he/she has no recent work record;
- an earlier job is particularly relevant to the current application;
- one referee is unavailable or refuses to provide a reference;
- references do not cover three years prior to appointment then further references from the candidate's former employers must be taken up.

Education Services will ask a candidates permission before taking up further references. Refusal to give this permission will not be a reason to automatically reject a candidate without further investigation.

5. References will be retained in the employee's file.





#### The Law on Preventing Illegal Working - Eligibility to Work in the United Kingdom

All external candidates must provide original documentation to prove they are eligible to work in the United Kingdom prior to appointment to a post within Glasgow City Council Education Services. All external candidates invited for interview should bring appropriate documentation with them as the Chair of the Interview Panel has responsibility for checking and certifying this information.

An APP5 form will be completed by all interview candidates and certified copies of original documentation will be attached with to this form and kept in the employees file for the duration of their employment.

The Home Office publishes up to date information on acceptable items of evidence of eligibility to work in the United Kingdom can be found at :

https://www.gov.uk/legal-right-work-uk; and https://www.gov.uk/government/publications/right-to-work-checklist.

Glasgow City Council holds a Tier 2 (General) sponsorship corporate license which allows sponsorship of migrants e.g. people from non European Union countries. This offers a route to employment for medium to highly skilled workers where a skills gap has been identified.

Education Services Human Resources will provide a sponsorship certificate where this is appropriate and managers should report immediately if a sponsored migrant fails to report for duty or has periods of unauthorised absence.

Follow up checks will be undertaken by Customer and Business Services for migrant workers who have a timelimited stay in the United Kingdom.

Management Circular APPFNNX

#### 1. WHO IS COVERED BY THE SCHEME

All employees undertaking regulated work are required to join the scheme. Most of Education Services employees require to be members of the scheme because they have contact with children; however some may require to be members of the scheme in terms of both children and protected adults. The Protection of Vulnerable Groups Act defines a child as being under 18 and a *"protected adult"* as an individual aged 16 or over who is in receipt of one or more type of care, health or welfare service.

#### **Regulated Work**

All employees and volunteers who care, teach, instruct, train or supervise children as part of what they are required to do will be carrying out regulated work and therefore will require to be covered by the scheme.

All employees, workers and volunteers who work (*paid or unpaid*) in schools/nurseries or any other educational establishment and have the opportunity for any unsupervised contact with children will be deemed to be doing regulated work with children as defined at schedule 2 of the Protection of Vulnerable Groups Act.

Unsupervised contact with children is where there is the potential opportunity for employees having close proximity which would allow an unsuitable person the possibility of either *"grooming"* a child over a period of time or a one off physical or sexual attack.

Employees of Education Services who provide certain advice or guidance to children will be covered by the Scheme.

Managers will be doing regulated work with children if they are responsible for the day to day supervision or management of an individual doing regulated work through the activities the individual performs or the establishments in which the individual works. This is based on the consideration that individuals at one remove from the front-line, those with day to day supervision or management responsibility for individuals doing regulated work are in a powerful position to safeguard (or harm) vulnerable groups by directing those individuals in their work.

Parents/Carers or other volunteers who are: caring for, teaching, instructing, training, supervising or being in sole charge of children (other than their own children) will be within scope of the Protection of Vulnerable Groups Scheme. Other parents/carers who are working, e.g. attending a Parent Council meeting, would only be in scope if anything permitted or required through this work gave them the opportunity for unsupervised contact with children.

Parents attending parents' evenings or visiting the school for any reason in their capacity as a parent are not doing work and are, therefore, outside the scope of the Protection of Vulnerable Groups Scheme.

It should be possible in most cases to make arrangements for parent council members to avoid unsupervised contact with children and thereby not join the Protection of Vulnerable Groups Scheme e.g. they will be escorted by a responsible person if moving around the school whilst children are present.

Posts covered by the Scheme within Education Services have been identified. Disclosure continues to be available for eligible posts not covered by the Protection of Vulnerable Groups scheme.

#### 2. APPLICATIONS/JOINING THE SCHEME

In order to join the Protection of Vulnerable Groups Scheme, employees undertaking regulated work will complete a detailed application form and provide proof of identity. There is a Protection of Vulnerable Groups Scheme application form and a simpler application form is available for subsequent applications (Scheme Update) by Protection of Vulnerable Groups Scheme members.

Only the successful candidate for a post will be required to join the Protection of Vulnerable Groups scheme. They will be invited to the Customer and Business Services Centre and given a form to complete prior to appointment. Original documents should be supplied at this time and this documentation will be verified by a Glasgow City Council authorised counter signatory. Disclosure Scotland will still carry out some identity checks of its own and if necessary may request copies of supporting documents from applicants. Teachers and Child Development Officers should include their General Teaching Council for Scotland/Scottish Social Services Council registration number when completing the form.

On application any vetting information about the employee will be gathered by Disclosure Scotland.

Vetting information is treated as highly sensitive and confidential. Where a scheme certificate identifies convictions or vetting information then this will be reviewed by a Senior HR Officer who will determine what, if any further action is necessary. Information will not be shared with the school or other staff unless this is absolutely essential.

#### 3. PAYING FOR SCHEME MEMBERSHIP

Education Services will not pay for membership of the Protection of Vulnerable Groups scheme or scheme updates for employees joining the organisation on permanent and fixed term contracts. Successful candidates, whether internal or external will be required to pay these fees. Where Glasgow City Council has already arranged Scheme Membership for an individual, a scheme update is not normally required.

Scheme membership is designed to be portable, and workers such as supply teachers who do not have employment rights or fixed term contracts and visiting artists are free to undertake work with other authorities and may decline work with Glasgow City Council. With this in mind, Education Services will not pay for scheme membership or scheme updates for workers in this category. Where the worker is not already a scheme member and wishes to undertake work for Education Services then Education Services/Customer and Business Services must countersign applications. Where a worker is a scheme member but this was not arranged or countersigned by Glasgow City Council, then Education Services/Customer and Business Services must countersign a Scheme Update and this must be received before any work is undertaken.

Where Education Services has arranged scheme membership for a worker, scheme updates will not necessarily be required, however where the worker has not been employed by Education Services for a period in excess of 12 months then references covering this period may be required.

Any establishment recruiting volunteers who will carry out regulated work will complete a pro forma requesting Protection of Vulnerable Group membership for the volunteer. The volunteer will then make an appointment to complete forms and provide evidence of identity. At present, Education Services centrally fund the cost of PVG checks for volunteers

Where a scheme update indicates that Vetting Information has been added then any employee or worker with Education Services will be expected to pay for a full scheme record in order to allow this vetting information to be reviewed.

#### 4. RECRUITMENT DECISIONS

Education Services will know that the individual is not barred because they are a scheme member. Even

where an individual has been granted scheme membership, the decision to offer regulated work will be determined by the content of the scheme record and information gathered using Glasgow City Council, Education Services' robust recruitment practices. The decision about whether an employee who is not barred is suitable for a position will ultimately be taken by Glasgow City Council. All criteria around vetting information will be applied in a fair, consistent and proportionate manner. The criteria will be identified in advance and linked to the specific role.

#### 5. UPDATES TO SCHEME MEMBERSHIP

The Scheme Record Update does not include any vetting information.

Where an individual is already a Protection of Vulnerable Groups Scheme member and has already obtained a scheme record, Glasgow City Council Education Services will apply for a scheme record update as part of any recruitment process or whenever they consider it to be appropriate. Where this update suggests that vetting information is available then the employee will be asked to provide their copy for inspection. The information on the Scheme Record Update will allow Education Services to confirm whether the Scheme Record shown is the most recent one issued.

## 6. ACTION WHERE AN INDIVIDUAL IS BEING CONSIDERED FOR LISTING

When an employee has become a scheme member Disclosure Scotland will update their record with any new vetting information as it arises. Where the new information is relevant to the regulated work undertaken, Scottish Ministers may decide to place the individual under formal consideration for listing. Both the individual concerned and Education Services will be notified of this.

Where an individual is placed under formal consideration for listing, Education Services will arrange to meet with the individual to discuss this and a risk assessment will be carried out to determine what further action may be required. It may be appropriate to make some adjustments to the employee's duties until the consideration case is determined, for example, there may be more supervision of the individual's contact with vulnerable groups during this period or alternative duties may be allocated. Education Services may also consider precautionary suspension and may carry out an investigation under the relevant disciplinary procedure at this stage which could lead to disciplinary action up to and including dismissal. Any such investigation will be conducted with consideration to the fact that organisations do not have any power under the Protection of Vulnerable Groups Act to share the fact that an individual is under consideration for listing with other persons. The action required to ensure anonymity will vary depending on the circumstances.

If the outcome of the consideration process is that the individual is not barred, the individual will not be treated any differently on the grounds of the consideration case. Any temporary change to the individual's duties/precautionary suspension resulting from a risk assessment following the notification of consideration for listing will be reviewed.

Regardless of the outcome of consideration for listing, Glasgow City Council, Education Services will always ask for a Scheme Record Update to see whether the consideration process has resulted in any new vetting information coming to light about the individual. This information will be considered as part of Education Services' ongoing evaluation and management of relevant employees and, should it be considered reasonable, an investigation under the relevant disciplinary procedure may be carried out to determine whether or not further action is recommended.

When an employee is being checked prior to employment and is found to be under consideration for listing they may still be offered a post however they will not be able to undertake any regulated work until the outcome of the consideration process is known and it is confirmed that they are not barred. In these circumstances the date of appointment will be delayed and any vetting information will be considered prior to confirming appointment.

#### 7. ACTION TO BE TAKEN WHEN AN INDIVIDUAL BECOMES BARRED

If the individual is barred then both the individual and organisation will be advised by letter that the individual is barred from doing that that type of regulated work. As it is an offence for an organisation not to remove an individual from regulated work when notified by Disclosure Scotland that they are barred and it is also an offence for an individual who is barred to undertake the type of regulated work from which they are barred, then the employee will immediately be precautionary suspended. As an investigation has already been undertaken by Disclosure Scotland, a disciplinary hearing will be carried out without further investigation. The individual who has been barred will have the opportunity to present their case in full at any disciplinary hearing.

#### 8. NOTIFYING DISCLOSURE SCOTLAND ABOUT CHANGES TO PERSONAL INFORMATION

It is the responsibility of the relevant employee to notify Disclosure Scotland of any changes to personal information required by the Protection of Vulnerable Groups Act.

Individuals should also keep other personal information up to date. Ensuring Disclosure Scotland has, for example, a current home address, telephone number or email address means that contact can be made quickly in the event of any query about Protection of Vulnerable Groups Scheme membership.

#### 9. **DISPUTING INFORMATION**

It is the responsibility of the individual to take up any disputes regarding information supplied by the Protection of Vulnerable Groups Scheme with Disclosure Scotland.

#### 10. RETENTION OF DISCLOSURE RECORDS

Copies of Scheme Records and Scheme Updates will not be retained. Education Services will retain details of when the Protection of Vulnerable Groups check was made, the certificate reference number, and the date of the check and for whom it was carried out. This will provide evidence if needed, for example, to an inspection body that appropriate checks have been carried out on staff.

#### 11. WHEN A PVG MEMBER LEAVES

All employees/workers and volunteers are responsible for notifying Disclosure Scotland if they leave employment and wish to remove Glasgow City Council, Education Services as having an interest in them. Glasgow City Council, Education Services will be advised of this and the employees may not then undertake regulated work.

If an organisation receives a notification concerning the consideration for listing or barring of an individual who no longer does regulated work for them, Disclosure Scotland will be contacted immediately and the notification returned.

#### 12. LAWFUL SHARING WITHIN AN ORGANISATION

It may be necessary to share the disclosure record with other employees, members and office holders within Glasgow City Council or where the disclosure has been requested on somebody else's behalf. The record will only be shared for the purposes of enabling Glasgow City Council to determine suitability for regulated work.

#### 13. REFERRALS

Broadly speaking, the criteria are that:

- a) an individual doing regulated work has done something to harm a child or protected adult and
- b) the impact is so serious that the Glasgow City Council would permanently remove the individual from regulated work. The first of these criteria is known as the referral ground.

There are other considerations when making a referral. Referrals will be made to Disclosure Scotland by the Head of HR, Education Services or a Senior Member of the Education HR team.

## 14. DISCLOSURE RECORDS

Glasgow City Council, Education Services will advise Disclosure Scotland if they request a copy of a Scheme Record for an individual but do not subsequently employ them. This means that Disclosure Scotland will be aware that Glasgow City Council is no longer an interested party in respect of that Protection of Vulnerable Groups Scheme member. Glasgow City Council, Education Services will retain an interest in supply teachers for the period they are retained on the supply register