

2 April 2025

Disclosure (Scotland) Act 2020: Advice to Dental Practices

Dear Colleague,

The purpose of this letter is to give an overview of the changes introduced by the Disclosure (Scotland) Act 2020, and the implications for dental practice.

Whilst some changes have been in force from 14 November 2024, there are further changes more directly relevant to the dental team, and it is important that you are aware of them and begin to plan.

Information on all the changes can be found here [Changes to our services - Disclosure Scotland](#) with an overview of the most relevant for teams provided below.

What is changing?

From 1 April 2025 Disclosure Scotland (DS) will introduce simplified disclosure products and people having more control over their information. The Protecting Vulnerable Groups (PVG) scheme membership will become mandatory for all regulated roles with children and protected adults.

The changes are that Level 1 - Replaces Basic Disclosure, Level 2 Disclosure replaces Standard and Enhanced Disclosure. Level 2 Disclosures PVG is the level used for PVG Scheme Applications. Further information is available at [Disclosure Scotland](#)

Practices need to ensure that they are ready to adhere to the changes to Disclosure Checks, for all staff 16 years and over [Implementing the Disclosure \(Scotland\) Act 2020 - Disclosure Scotland](#). With the exception of dedicated administrative roles, with no chairside presence, the dental team hold regulated roles and require PVG membership (Level 2 PVG). Administrative staff require Level 2 Disclosure.

Where clinical staff work across differently owned practices, each practice requires to obtain a registered interest for that clinician. NHS Boards secure a registered interest in dentists as part of the listing process. This does not remove the obligation for practices to also have a registered interest in those dentists working with them.

The existing PVG membership arrangements within dental practice means that you are already ideally placed to react to the changes ahead.

From 1 July 2025 onwards two new offences will come into force. It will become an offence for anyone carrying out a regulated role to do so whilst not a PVG member, practices cannot offer any type of regulated role to an individual unless they have received a Level 2 with PVG disclosure.

There is no requirement to carry out new PVGs or Level 2 Disclosures unless the person is doing a regulated role and the practice have not done a check previously, or a new regulated role is identified.

Practices should consider the benefits of registering directly with Disclosure Scotland to process the new checks as the new online accounts provides ease of access to information, which is time limited. Further details for registering for this on-line service, or to find an organisation that will do this on your behalf, can be found at - [Find an umbrella body - mygov.scot](https://www.findanumbrellabody.mygov.scot)

What should you do to prepare?

Make sure that your information is up to date. By law PVG Scheme members need to tell DS if their personal details have changed. Practices should advise DS to remove their registered interest in any team member they are linked with if they leave the practice or no longer have a regulated role. You can do this via email to dsupdate@disclosurescotland.gov.scot providing the individual's name, date of birth and PVG number.

Future planned changes?

The most significant change is that lifetime PVG scheme membership will end and be replaced with a time-limited (five years) membership. The timescale for this is 1 April 2026. DS are currently engaging with stakeholders to understand what is required for the transition of existing scheme members to time-limited membership. Further details on transitional arrangements will be provided by DS as soon as possible. It is expected that NHS Boards will liaise with dentists who are providing General Dental Services in their area to enact those changes.

Any questions concerning the changes not covered by accessing the links provided should be directed to the Disclosure Scotland Act Implementation mailbox at: DisclosureAct@disclosurescotland.gov.scot.

I trust this information is helpful to your preparations.

Yours sincerely



Tom Ferris
Chief Dental Officer