

Guidance Update

Following our earlier guidance issued on the [23rd May 2025](#), Optometry Scotland, supported by the UK representative bodies, has continued to engage positively with Disclosure Scotland to help the profession transition seamlessly and proportionately to the new PVG requirements for optical practices and clinicians.

This guidance provides the following updates:

Employers

The new PVG requirements mean that as it is the employer who instructs or allows a clinician to undertake regulated activity, it is the employer who has to check that the employee is an up-to-date member of the PVG scheme with barring (Disclosure (Scotland) Act 2020 [section 73](#) paragraph 46).

In the case of employed optometrists, ophthalmic medical practitioners (OMPs) and contact lens or dispensing opticians (CLOs, DOs) this means requesting a new disclosure including barring for new employees.

This also means that employers should not rely (except in an emergency – see below) on a disclosure to a previous or other employer or the fact that an optometrists will have submitted evidence of PVG scheme membership to a health board to be on its ophthalmic list.

It has also been clarified that large optical businesses or groups are able to centralise these checks on behalf of their practices as now if they wish.

The fee for employers to register is £125 per year via <https://www.mygov.scot/register-organisation-disclosure> and costs per check are :

Level 1	£25
Level 2	£25
Level 2 with barred list check	£25
VG Scheme	£59 for new applicants (£18 for those on previous PVG Scheme).

Alternatively, employers can use an umbrella organisation which will charge a fee for each application.

If an employer has checked the PVG membership and barring status within the past three years and in absence of any new concerns, they could consider that status valid.

Disclosure Scotland will be issuing further guidance in due course about how the phasing of new 5-year limit on PVG scheme membership will be implemented – see below.

Employed Contact Lens and Dispensing Opticians

Contact lens and dispensing opticians have now been brought within the PVG scheme requirements in the same way as optometrists and OMPs and will need to demonstrate PVG Scheme membership with barring as they will be carrying out regulated activity.

For employed CLOs and DOs this will need to be arranged through their employer as above.

Locums

The duties on practices to check that locums are members of the PVG scheme and have no barring limitations are the same as for employed staff, but the mechanisms may vary as locums by definition are not employees.

There are various locum supply models, in instances where:

- a locum is employed and supplied by a locum or staff agency – the engagement is with the agency and the agency is therefore responsible for checking the PVG status of the locums it supplies, and the engaging¹ practice can rely on this and does not need to repeat the check
- a locum runs their own company and employs and supplies themselves as locum – the engagement is with company and the locum's company is therefore responsible for checking the PVG status of the locum it supplies, and the engaging practice can rely on this and does not need to repeat the check
- the locum is freelance: for example, they may operate all their clinical practice on a fully self-employed locum basis or may be specifically employed for part of the time (where the employer should check appropriate PVG status as above); in both cases the individual should obtain and supply to engagers their own PCV membership and a barring clearance through my.scot.gov. In this instance, the engaging practice is responsible for checking.

Locums in Emergencies

Disclosure Scotland has helpfully shared with us guidance they have issued to GP practices about locum engagement which would also apply to eye care as adapted below:

For a locum optometrist to be permitted to practice in a health board area, they must be included in the relevant part of the ophthalmic list for the area. A PVG scheme disclosure for the health board is a requirement for inclusion on the list.

Where a locum (optometrist, DO or CLO) is working for an optical practice, a PVG scheme disclosure may also be required for the practice in certain circumstances. This depends on the circumstances that led to the locum being required.

- If the requirement for a locum is known in advance (for example, to cover family or annual leave), a PVG scheme disclosure is required, as the individual is carrying out a regulated role for the practice
- For emergency situations where a locum is required at short notice (for example, due to sudden absence such as sick leave), then that emergency arrangement is out with the scope of PVG. Practices do not need to get a PVG check for locums who are working on an emergency, short-term basis and arranged at the last minute. It is not currently possible to define a time period "short notice" may apply to.

Where that arrangement does extend beyond a short-term illness cover arrangement, then the PVG requirement would apply for the practice.

5 Year PVG Scheme Membership

Disclosure Scotland plans to issue further guidance about how this change for existing members of the PVG scheme will be phased in. Optometry Scotland will keep members updated.

Non-Registrant Staff

Disclosure Scotland has also helpfully clarified that regulated activity only occurs while the patient is undergoing clinical care not during other time they may spend in the practice for instance in waiting, selecting frames etc.

It is not anticipated therefore that reception, sales, support or administrative staff will need to be covered by the PVG scheme and employers should continue to adopt a risk-based approach for instance by using the risk assessment process outlined in [OS PVG Draft Guidance](#).

Positive Disclosures

Further to our previous guidance, any individual who comes up on a list barring them from working with children or protected adults should immediately be withdrawn from regulated activity while next steps are considered including seeking advice from your UK representative body.

Future Work and Contacts

Optometry Scotland and the UK representative bodies will continue to work closely with Disclosure Scotland on your behalf as implementation is rolled out to ensure patient safety is secured and to ensure that extra work and cost for practices is proportionate and risk based.

In the meantime, contacts for further advice are:

- Disclosure Scotland: response@disclosurescotland.gov.scot
- Optometry Scotland: office@optometriscotland.org.uk
- ABDO: membership@abdo.org.uk
- AOP: regulation@aop.org.uk
- FODO: info@fodo.com