

The Police Act 1997 (Criminal Records) (Homes for Ukraine Sponsorship Scheme) (Scotland) Amendment Regulations 2022

March 2023

Data Protection Impact Assessment

The Police Act 1997 (Criminal Records) (Scotland) Amendment Regulations

The Police Act 1997 (Criminal Records) (Home for Ukraine Sponsorship Scheme) (Scotland) Amendment Regulations 2022

Version date: 25 May 2022

Review date:

These regulations are made in exercise of the powers conferred on Scottish Ministers by sections 113B(2)(b), 113CA(1), 113CB (1) and 125(1) and (5) of the Police Act 1997.

The text of the legislation is published at [The Police Act 1997 \(Criminal Records\) \(Scotland\) Amendment Regulations 2022 \(legislation.gov.uk\)](#) and [The Police Act 1997 \(Criminal Records\) \(Homes for Ukraine Sponsorship Scheme\) \(Scotland\) Amendment Regulations 2022 \(legislation.gov.uk\)](#)

The Police Act 1997 (Criminal Records) (Scotland) Amendment Regulations 2022 were made on 17 March 2022 and came into force on 24 March 2022. These regulations made amendments to the Police Act 1997 (Criminal Records) (Scotland) Regulations 2010 (“the 2010 Regulations”) so that the appropriate level of disclosure checks could be made in relation to individuals offering to provide accommodation within premises they also reside in (and those over the age of 16 years residing within the same premises) to displaced Ukrainians under the Homes for Ukraine Sponsorship Scheme.

The Police Act 1997 (Criminal Records) (Homes for Ukraine Sponsorship Scheme) (Scotland) Amendment Regulations 2022 were made on 6 May 2022 and came into force on 12 May 2022. These regulations substituted the amendments made by the Police Act 1997 (Criminal Records) (Scotland) Amendment Regulations 2022, and now provide for enhanced disclosure checks to be carried out when any individual, whose suitability to provide accommodation to a person who has permission to enter into or to stay in the UK under the Homes for Ukraine scheme (regardless of whether that accommodation is restricted to premises in which the individual also resides or not), is being assessed.

1. Contact and schedule information

1.1 SG department

Disclosure Scotland

1.2 Contact email

Kevin.lee@disclosurescotland.gov.scot

1.3 Data protection support email

Data protection officer

DSDPO@gov.scot

Debra.Macneil@disclosurescotland.gov.scot

1.4 Is your proposal primary legislation, secondary legislation, or other form of statutory measure?

Secondary legislation

1.5 What stage is the legislative process at? Please indicate any relevant timescales and deadlines.

The first regulations were laid before the Scottish Parliament, 17th March 2022 and came into force on 24th March 2022. The second regulations were laid before the Scottish Parliament, 6th May 2022 and came into force on 12th May 2022.

2. Introductory information

Questions and Comments

2.1 Summary of proposal

These regulations have been made in response to the “Homes for Ukraine” Sponsorship Scheme announced by the UK Government and the Scottish Government’s intention to act as a “super sponsor” for those fleeing the war in Ukraine.

Currently, the Police Act 1997 (Criminal Records) (Homes for Ukraine Sponsorship Scheme) (Scotland) Amendment Regulations 2022 and the Rehabilitation of Offenders Act 1974 (Exclusions and Exceptions) (Homes for Ukraine Sponsorship Scheme) (Scotland) Amendment Order 2022 extend the circumstances in which questions about previous criminal history may be asked of an individual, when assessing their suitability in particular circumstances, to include those persons volunteering to provide accommodation (whether that be within personal homes or via second properties) to a person who has permission to enter or stay in the UK under immigration rules granted in relation to the Homes for Ukraine scheme. Where the individual offering the accommodation is offering a room in their own home, any other individual over the age of 16 years also residing in the household with that individual, can also be subject to the same level of check.

Connected amendments to the statutory framework in relation to self-disclosure were initially made by the Rehabilitation of Offenders Act 1974 (Exclusions And Exceptions) (Scotland) Amendment Order 2022 and subsequently by the Rehabilitation of Offenders Act 1974 (Exclusions and Exceptions) (Homes for Ukraine Sponsorship Scheme) (Scotland) Amendment Order 2022. These Orders ensure that the rules on self-disclosure and state disclosure of convictions are aligned.

There is no separate DPIA for the ROA Amendment Order because it does not affect the way Disclosure Scotland will process or store an individual’s personal data. The powers to process and share information are derived from Part V of the Police Act 1997 and the 2010 Regulations.

2.2 Description of the personal data involved

Please also specify if this personal data will be special category data, or relate to criminal convictions or offences

Enhanced disclosure checks, even in these circumstances, may still only be made by persons or organisations registered with Disclosure Scotland under section 120 of the Police Act 1997.

The registered person/countersignatory will collect the personal information relating to specific applications –

this will include name(s), previous names, National Insurance (NI) number, driving licence number, passport number, date of birth, place of birth, nationality, addresses over last five years and contact details.

The countersignatory will conduct identity verification. Disclosure Scotland's Code of Practice for countersignatories sets out that three pieces of information should be requested from an individual to support identification. Where possible one should be photographic (for example, a current passport or new style UK driving licence), one should confirm the name and address of the individual and one should confirm the date of birth of the individual.

In practice, the disclosure applicant will complete the first part of the form (questions 1 to 6) and send it to the countersignatory, who then completes the rest of the form. A link to the form is provided in Annex E.

Completed applications for sponsors and adults within the sponsor accommodation are then sent to dsoperations@disclosurescotland.gov.scot

Application details are checked by Disclosure Scotland against the police databases. When Disclosure Scotland has completed its checks, it will issue an enhanced disclosure certificate to both the counter signatory and the individual sponsor or adult within the sponsor accommodation.

2.3 Will the processing of personal data as a result of the proposal have an impact on decisions made about individuals, groups or categories of persons?

If so, please explain the potential or actual impact. This may include, for example, a denial of an individual's rights, or use of social profiling to inform policy making.

The regulations will not result in the routine processing of data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, data concerning health or data about a person's sex life or sexual orientation. Some biometric data will be processed in the form of fingerprints. The powers to process such data already exist in the Police Act 1997 and are only used in cases where other means of authentication have been unsuccessful. In practice, fingerprints are used vary rarely to confirm someone's identity as part of the application process. However, there are occasions where somebody might have given another person's details when arrested or where the applicant has a very similar name, date of birth and address history as an entry on the Criminal History System ("CHS"). In these circumstances, a criminal record may potentially be attributed to the wrong person during a disclosure check. The CHS uses fingerprints to link a criminal record to the individual. Disclosure Scotland can therefore use fingerprint identification to confirm whether or not the applicant is the same person as the one with the criminal record, thereby ensuring that a criminal record is not wrongly attributed. The process is governed by the 2010 regulations. Disclosure Scotland can refuse to consider a disclosure application in cases where the applicant refuses to provide fingerprints. Disclosure Scotland must ensure the destruction of fingerprints taken for assisting the authentication of identity, once that task is completed.

2.4 Necessity, proportionality, and justification

What issue/public need is the proposal seeking to address?

What policy objective is the legislation trying to meet?

Were less invasive or more privacy-friendly options considered, and if so why were these options rejected?

Are there any potential unintended consequences with regards to the provisions e.g., would the provisions result in unintended surveillance or profiling?

Have you considered whether the intended processing will have appropriate safeguards in place? If so, briefly explain the nature of those safeguards and how any safeguards ensure the balance of any competing interests in relation to the processing.

The Scottish Government's policy intent is to ensure there are adequate levels of vetting checks on those who wish to provide accommodation to displaced Ukrainians.

The Homes for Ukraine scheme (including the 'Warm Scots Welcome' programme which enables displaced Ukrainian persons, when applying for a visa under the scheme, to select the Scottish Government as their super sponsor) is a voluntary scheme whereby members of the public through a UK Government portal can note their interest to become a sponsor and provide accommodation. The guidance that is currently available on the UK Government website clearly states that disclosure checks will be undertaken in relation to those volunteering to be sponsors; where those volunteering are offering to provide accommodation within the same premises that they also reside in, other adult members of their household will also be subject to disclosure checks.

Whilst the vast majority of people coming forward to host refugees will present no risk of harm to them, the Scottish Ministers believe the system (which criminal record checks forms one part of) should be sufficiently robust to protect it from those who may seek to exploit vulnerabilities in the system.

Scottish Government considered the appropriate level of vetting and concluded the policy proposal should be weighted on the side of minimising any risk of placing refugees with an unsuitable individual while allowing for the scheme to achieve its aims and move at a suitable pace. It was determined that the appropriate level of vetting would be achieved by provision of the enhanced criminal record certificate with suitability information relating to children and protected adults, issued under sections 113B, 113CA and 113CB of the Police Act 1997.

2.5

Will the implementation be accompanied by guidance or by an associated Code of Conduct?

If the latter, what will be the status of the Code of Conduct? (statutory or voluntary?)

As noted above, enhanced disclosure checks, even in these circumstances, may still only be made by persons or organisations registered with Disclosure Scotland under section 120 of the Police Act 1997.

These organisations must adhere to the existing Code of Practice issued to registered bodies under section 122 of the Police Act 1997.

A link to the existing version of that Code is at Annex B.

In addition, sections 123 and 124 of the Police Act 1997 set out the offence provisions in relation to falsification, unlawful requests for and use of higher level disclosures and unlawful disclosure

3. Data Controllers

<If there is more than one data controller involved, please complete a separate table for each>

Organisation Disclosure Scotland

Activities

Disclosure Scotland is an Executive Agency of the Scottish Government. It exercises the functions of the Scottish Ministers under the Police Act 1997 and the Protection of Vulnerable Groups (Scotland) Act 2007 (“the PVG Act”) to issue criminal record disclosures.

Disclosure Scotland also operates the PVG Scheme (established in February 2011) and holds the lists of individuals barred from doing regulated work with children and/or protected adults.

Is the organisation a public authority or body as set out in Part 2, Chapter 2, Section 7 of the Data Protection Act 2018?

Yes

Lawful basis for processing under UK General Data Protection Regulation (UK GDPR) Article 6 for the collection and sharing of personal data – general processing

The principal lawful basis for processing is Article 6(1)(e) of the GDPR. Some processing may also take place on the basis of article 6(1)(d). Special category data

is processed under Article 9(2)(g). Criminal conviction data is processed under Article 10.

Disclosure Scotland gathers and processes data under the Police Act 1997 and the Police Act (Criminal Records) (Scotland) Regulations 2010 (SSI 2010/168), in line with the DPA and UK GDPR.

Lawful basis for processing - Part V of the Police Act 1997.

Law Enforcement – if any law enforcement processing will take place – lawful basis for processing under Part 3 of the Data Protection Act 2018

Part V of the Police Act 1997.

Legal gateway for any sharing of personal data between organisations

[Disclosure Scotland's privacy statement - mygov.scot](#)

4. Consultation

Questions and Comments

4.1

Have you consulted with the ICO using the Article 36(4) form (please provide a link to it)

If the ICO has provided feedback, please include this.

The regulations had to be brought into force urgently in order to have a suitable safeguarding system in place for the imminent commencement of the Homes for Ukraine scheme.

This ensured agencies such as local authorities, placing displaced Ukrainian nationals, and their immediate family members with sponsors, have access to the appropriate level of conviction and other criminal history information to make informed placement decisions.

The ICO provided feedback on this DPIA on 01/04/2022 which has been addressed in the body of this document.

4.2 Do you need to hold a public consultation and if so, has this taken place? What was the result?

No

4.3 Were there any Comments/feedback from the public consultation about privacy, information or data protection?

N/A

5. Further assessment and risk identification

<Use this section to identify risks which are further detailed in section 6>

Questions and Comments

5.1 Will the proposal require the creation of new identifiers, or require the use of existing ones?

Existing.

The same identifiers will be used as those under the existing regime. Name and previous names, National Insurance (NI) number, driving licence number, passport number, date of birth, place of birth, nationality and five year address history are all collected as part of the official collection and recording of information.

As set out in 2.3, there will be a continuation of existing powers to verify the identity of an individual through fingerprint data in some cases (see 2.3). The process for this is governed by Article 14 of the 2010 regulations.

5.2 Will the proposal require regulation of:

- **technology relating to processing**
- **behaviour of individuals using technology**
- **technology suppliers**
- **technology infrastructure**
- **information security**

Disclosure Scotland has a security policy, technical architecture and security governance to provide compliance for the systems and services. This includes independent testing, assurance and accreditation by key stakeholders. The IT system has been subject to extensive CHECK technical IT penetration testing by an approved supplier. Vulnerabilities are addressed in a current risk treatment plan.

5.3 Will the proposal require establishing or change to operation of an established public register (e.g. Accountancy in Bankruptcy, Land Register etc.) or other online service/s?

No

5.4 Please provide details of whether the proposal will involve the collection or storage of data to be used as evidence or use of investigatory powers (e.g.in relation to fraud, identify theft, misuse of public funds, any possible criminal activity, witness information, victim information or other monitoring of online behaviour)

N/A. Information may be shared with police forces to prevent and detect crime, for example, reporting suspicions of a fraudulent application having been made.

5.5 Would the proposal have an impact on a specific group of persons e.g. children, vulnerable individuals, disabled persons, persons with health issues, persons with financial difficulties, elderly people? (Please specify) In what way?

N/A. Secondary legislation affects those volunteering to provide accommodation to displaced Ukrainians who have permission to enter or to stay in the UK granted in relation to the Homes for Ukraine Sponsorship scheme. It will support safeguarding of those vulnerable due to their displacement.

5.6

Is there anything potentially controversial or of significant public interest in the policy proposal as it relates to processing of data? For example, is the public likely to view the measures as intrusive or onerous?

Are there any potential unintended consequences with regards to the provisions e.g., would the provisions result in unintended surveillance or profiling.

Have you considered whether the intended processing will have appropriate safeguards in place? If so, briefly explain the nature of those safeguards and how any safeguards ensure the balance of any competing interests in relation to the processing.

The state disclosure system in Scotland is well established. The proposal extends existing frameworks to cover sponsors. Responsibilities in relation to the use of disclosure information by registered bodies are set out in the Code of Practice. If organisations registered with Disclosure Scotland need to apply for new countersignatories to keep up with the pace of the Homes for Ukraine scheme, the existing registration process would be followed to ensure they understand their responsibilities in relation to the disclosure of criminal history information.

In support of the Homes for Ukraine scheme, Disclosure Scotland established a dedicated team to support local authorities in handling disclosure checks for individuals offering accommodation under the Homes for Ukraine scheme. Disclosure Scotland has been working closely with the local authorities involved in the Homes for Ukraine scheme and who have been responsible for submitting all applications under it to date. At present, local authorities appear to have been able to absorb the demand for applications through their existing cohort of registered persons and have been using a priority service created by Disclosure Scotland.

Public opinion is generally supportive of the use of criminal record checks to support the safety of vulnerable people.

5.7 Are there consequential changes to / in other legislation that need to be considered as a result of the proposal or the need to make further subordinate legislation to achieve the aim?

Connected amendments to the statutory framework in relation to self-disclosure were initially made by the Rehabilitation of Offenders Act 1974 (Exclusions And Exceptions) (Scotland) Amendment Order 2022 and subsequently by the Rehabilitation of Offenders Act 1974 (Exclusions and Exceptions) (Homes for Ukraine Sponsorship Scheme) (Scotland) Amendment Order 2022. These Orders ensure that the rules on self-disclosure and state disclosure of convictions are aligned.

5.8 Will this proposal necessitate an associated code of conduct? If so, what will be the status of the code of conduct (statutory, voluntary etc.)?

Existing Code of Practice.

5.9 Have you considered whether the intended processing will have appropriate safeguards in place, for example in relation to data security, limitation of storage time, anonymisation? If so briefly explain the nature of those safeguards

Please indicate how any safeguards ensure the balance of any competing interests in relation to the processing.

As noted throughout, enhanced disclosure checks, even in these circumstances, may still only be made by persons or organisations registered with Disclosure Scotland under section 120 of the Police Act 1997.

Responsibilities in relation to the handling and use of disclosure information by registered bodies are set out in the Code of Practice.

5.10 Will the processing of personal data as a result of the proposal have an impact on decisions made about individuals, groups or categories of persons? If so, please explain the potential or actual impact. This may include, for example, a denial of an individual's rights or use of social profiling to inform policy making.

Criminal history information will be used to help assess suitability of those offering to provide accommodation to displaced Ukrainians who have permission to enter or to stay in the UK granted in relation to the Homes for Ukraine Sponsorship scheme. This information will not be the sole determining factor for suitability, delivery partners will also be undertaking other checks on the suitability of the home.

5.11 Will the proposal include automated decision making/profiling of individuals using their personal data?

There will be no automated decision making / profiling of individuals. The enhanced disclosures will be provided to those registered persons in organisations who are tasked to make informed placements decisions under the Homes for Ukraine scheme.

**5.12 Will the proposal require the transfer of personal data to a ‘third country’?
(Under UK GDPR this is defined as country outside the UK.)**

No.

6. Risk Assessment

Risk

6.1.1 Risk to individual rights

- **right** to be informed
- **right** of access
- **right** to rectification
- **right** to erasure
- **right** to restrict processing
- **right** to data portability
- **right** to object
- **rights** in relation to automated decision making and profiling

Will this initiative result in any detriment if individuals do not want their personal data to be processed? This is particularly relevant if special category data is being processed

Solution or mitigation

The Homes for Ukraine scheme (including the ‘Warm Scots Welcome’ programme which enables displaced Ukrainian persons, when applying for a visa under the scheme, to select the Scottish Government as their super sponsor) is a voluntary scheme whereby members of the public throughout a UK Government portal can note their interest to become sponsor and provide accommodation. The guidance that is currently available on the UK Government website clearly states that disclosure checks will be undertaken in relation to those volunteering to be sponsors; where those volunteering are offering to provide accommodation within the same premises that they also reside in, other adult members of their household will also be subject to disclosure checks.

Disclosure Scotland collects, holds and processes personal information because the processing is necessary for the exercise of our functions as an Executive Agency as outlined in legislation that governs criminal records checks. This is a legitimate condition of processing as outlined under the DPA. Individuals are made aware on the “declaration” section of the application of how their personal data will be used.

When Disclosure Scotland has completed its checks, it will issue an enhanced disclosure certificate to both the countersignatory and the individual applicant.

Disclosure Scotland will uphold individual rights as stated in Disclosure Scotland's Privacy Statement.

6.2.1 Privacy risks

Purpose limitation

Solution or mitigation

Data will only be gathered for the purposes covered under the Police Act 1997 and secondary legislation made under it.

Likelihood (Low/Med/High)

Low

Severity (Red/Amber/Green)

Green

Result

Accepted

6.2.2 Privacy risks

Transparency – data subjects may not be informed about the purposes and lawful basis for the processing, and their rights

Solution or Mitigation

As stated within the Disclosure Scotland Privacy Statement, individuals have the right to access the information held about them by Disclosure Scotland and can ask for any data to be amended if it is incorrect. Individuals can ask Disclosure Scotland not to process information used for the disclosure certificate if it would cause substantial unwarranted damage or distress. Individuals can request that non-automated decisions are made regarding their data.

Likelihood (Low/Med/High)

Low

Severity (Red/Amber/Green)

Green

Result

Accepted

6.2.3 Privacy risks

Minimisation and necessity

Solution and Mitigation

Disclosure Scotland gathers and processes data under the Police Act 1997, in line with the DPA. Disclosure Scotland ensures all information gathered is adequate, relevant and not excessive. Information is processed in accordance with the individual's rights and is not kept for longer than is necessary.

Likelihood (Low/Med/High)

Low

Severity (Red/Amber/Green)

Green

Result

Accepted

6.2.4 Privacy risks

Accuracy of personal data

Solution and Mitigation

Disclosure Scotland processes, gathers, retains and securely destroys data under the Police Act 1997, and in compliance with DPA. Information is processed in accordance with the individual's rights and is not kept for longer than is necessary.

Likelihood (Low/Med/High)

Low

Severity (Red/Amber/Green)

Green

Result

Accepted

6.3.1 Security risks

Keeping data securely

Retention

Solution and Mitigation

Disclosure Scotland processes, gathers, retains and securely destroys data under the Police Act 1997, and in compliance with DPA.

Likelihood (Low/Med/High)

Low

Severity (Red/Amber/Green)

Green

Result

Accepted

6.3.2 Security risks

Transfer – data may be lost in transit

Solution and Mitigation

All data is stored on secure servers which have extensive IT security measures in place in line with Scottish Government IT standards.

Likelihood (Low/Med/High)

Low

Severity (Red/Amber/Green)

Green

Result

Accepted

6.3.3 Security risks

Processing activities

Solution and Mitigation

No new processing activities need developed to conduct these checks as the processes and procedures required are already embedded in business as usual.

Likelihood (Low/Med/High)

Low

Severity (Red/Amber/Green)

Green

Result

Accepted

6.4.1 Other risks

16 and 17 year old children living in the sponsoring household will also be eligible for checks.

Solution and Mitigation

The Scottish Government has carried out the CWRIA in relation to this policy and it will be published on the gov.scot website.

Checks on 16 and 17 year olds living in the sponsoring household balanced against the risk to individuals and families being placed in a sponsor home where they would be at risk. 16 and 17 year old children will need to agree to have the criminal record check carried out.

Disclosure Scotland Privacy Statements are written in plain language and direct to further information sources.

Likelihood (Low/Med/High)

Medium

Severity (Red/Amber/Green)

Orange

Result

Reduced

Data Protection Officer (DPO)

The DPO may give additional advice, please indicate how this has been actioned.

Advice from DPO

Due to the emergency nature of this situation, there was lack of opportunity to carry out an A36(4) consultation with the ICO.

Action

The ICO were notified of the situation by email on 17th March 2022 and a copy of this DPIA made available on request.

Advice from DPO

Due to it being an emergency response there is a chance that people may sign up without fully understanding the requirements of the check.

Action

We must communicate clearly what level of check the individual is applying for, what this means and ensure the Privacy Statement is widely available and linked and age appropriate.

Targeted Privacy Statement published with links to further information - <https://www.mygov.scot/disclosure-scotland-privacy-statement-ukrainian-hosts>

I confirm that THE POLICE ACT 1997 (CRIMINAL RECORDS) (SCOTLAND) AMENDMENT REGULATIONS 2022 and THE POLICE ACT 1997 (CRIMINAL RECORDS) (HOMES FOR UKRAINE SPONSORSHIP SCHEME) (SCOTLAND) AMENDMENT REGULATIONS 2022 have been sufficiently assessed in compliance with the requirements of the UKGDPR and Data Protection Act 2018.

Name and job title of a IAO or equivalent

Laura McCluskey, Deputy Chief Executive Disclosure Scotland

Date each version authorised

15 June 2022

Annex B – link to legislation –

[The Police Act 1997 \(Criminal Records\) \(Scotland\) Amendment Regulations 2022 \(legislation.gov.uk\)](#)

[The Police Act 1997 \(Criminal Records\) \(Homes for Ukraine Sponsorship Scheme\) \(Scotland\) Amendment Regulations 2022 \(legislation.gov.uk\)](#)

Annex B – Copy of/link to accompanying guidance/Code of Conduct - [Disclosure Scotland Code of Practice - mygov.scot](#)

Annex C – Data flow map - [Enhanced disclosure - mygov.scot](#)

Annex D – [Disclosure Scotland's privacy statement - mygov.scot](#)

Annex E - [Enhanced disclosure form for hosts of displaced Ukrainians - mygov.scot](#)

Annex F - [Disclosure Scotland's privacy statement for hosts of displaced Ukrainian people - mygov.scot](#)

Annex G – Additional Disclosure Scotland guidance pages - [Criminal record checks for hosts of displaced Ukrainian people - mygov.scot](#)

Annex H – Additional guidance for local authorities - <https://www.gov.scot/publications/super-sponsor-scheme-and-homes-for-ukraine-guidance-for-local-authorities/pages/person-checks/?msclid=ee3149dec70111ec8c6c56cac11239f3>



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