



Safeguarding Vulnerable Groups Policy

Company Policy No: 60
Company: Alert Health 24 Ltd
Issue No: 10
Revision Date: April 2026
Review Date: April 2027

Safeguarding Vulnerable Groups Policy

Policy Statement

We are committed to ensuring the safety and security of vulnerable group of the community with whom our staff, contractors and temporary workers come into contact and as such we have in place stringent safeguards to protect the patients, service users, colleagues and customers with whom we work.

This policy also covers the practices and reporting procedures for our employees, contractors and temporary workers should they suspect that any form of abuse is taking place.

This policy is drawn from the guidance and requirements outlined in the following legislation:

- Rehabilitation of Offenders Act 1974
- National Health Service & Community Care Act 1990
- The Police Act 1997
- Human Rights Act 2000
- Domestic Violence, Crime and Victims Act 2004
- Mental Capacity Act 2005 and Deprivation of Liberty Standards
- Safeguarding Vulnerable Groups Act 2006
- Mental Health Act 2007
- Equality Act 2010
- The Care Act 2014
- Social Care and Social Work Improvement Scotland (Requirements for Care Services) Regulations 2011
- Adult Support & Protection Act (Scotland) 2007
- Protection of Vulnerable Groups (Scotland) Act 2007
- Children & Young People (Scotland) Act 2014
- Mental Health Care and Treatment (Scotland) Act 2003
- Adults with Incapacity (Scotland) Act 2000

It is also based on advice and guidance taken from relevant regulatory agencies including the General Medical Council, Nursing & Midwifery Council, Health & Care Professionals Council, RQIA and the Care Inspectorate.

The company's aim is to provide a service that enables patients to feel happy and secure and to allow parents, families and carers to feel confident that the people providing the services are trustworthy, responsible and will do everything they can to keep the person safe from harm by ensuring:

- The status of all staff, contractors and temporary workers taking part in any regulated activity is checked against the DBS register.
- We do not engage an employee, contractor or temporary worker to take part in regulated activity if they are on the adult's barred list. In Scotland we will check membership of the Protecting Vulnerable Groups (PVG) scheme which is managed and delivered by Disclosure Scotland. Any nurse appearing on the adult's barred list will not be allowed to participate in regulated work. We obtain an enhanced DBS certificate for every employee, contractor and temporary worker taking part in a regulated activity and accept portability (i.e. DBS Certificates, provided either by the individual involved, where the applicant is registered with the DBS Update Service and has provided an original certificate. These must be obtained by us prior to the employee or temporary worker commencing any regulated activity and thereafter annually and/or the DBS Register will be checked for candidates who have paid to be registered on the DBS Registration Service. Candidates will not be allowed to participate in regulated activity without a valid DBS

check. For candidates in Scotland we will conduct rechecks of the PVG membership scheme on a monthly basis and also prior to any change of assignment or placement.

- Employees, contractors and temporary workers are trained to understand the different types of abuse, the indicators for each of these and the procedures to follow in the event that they suspect such abuse is taking place.
- We consistently update training for employees, contractors and temporary workers to reflect statutory guidance and good practice guidance including where and how to report any concerns relating to suspected abuse or neglect.
- Where a patient, family member, friend or neighbour makes repeated allegations, each one is treated without prejudice and risk assessed. If appropriate, action is taken to protect staff and others from unfounded allegations.
- We assist participating authorities in meeting their obligations by reporting suspected risk or actual abuse or neglect where appropriate to the authority itself, the relevant regulatory body, the DBS (or Disclosure Scotland), and the Police if a criminal offence may have occurred within 24 hours of becoming aware of the situation.

We have a zero-tolerance approach to dealing with abuse and neglect.

Scope of the Policy

It is the duty of all employees, contractors and temporary workers to comply with this policy. All employees, contractors and temporary workers are made fully aware of this policy and of their duties and responsibilities under the above legislation as part of the company's induction programme and mandatory safeguarding training.

This policy applies to all Children, Vulnerable Persons / Adults at Risk of Harm regardless of sex; race (including colour, nationality, ethnic or national origin); religion or belief; age; disability; marital status and civil partnership; sexual orientation; gender reassignment; pregnancy and maternity.

Responsibilities

All employees have a responsibility to accept their personal involvement in applying it and must be familiar with the policy and ensure that it is followed by both themselves and employees, contractors and temporary workers for whom they have a responsibility.

Disciplinary action may be taken against any employee who acts in breach of this policy. Disciplinary action may include summary dismissal in the case of a serious breach of this policy or repeated breaches. In other cases, it may include a warning, oral or written. Such action will be taken in accordance with the Company's disciplinary procedure. For contractors or temporary workers on contract for services, the assignment may be terminated immediately, and the contractor or temporary worker may not be offered further work until the outcome of the enquiry has been completed.

Breaches of this policy may also result in the employee responsible being held personally liable if legal action is taken in relation to safeguarding issues.

Procedures

SAFE RECRUITMENT PROCEDURE

When recruiting staff, contractors or temporary workers to take part in regulated activities involving Children, Vulnerable Persons / Adults at Risk of Harm, we will ensure the following:

- Interviews are conducted by trained staff who have received guidance in relation to current legislation and best practice pertaining to the recruitment and placement of candidates who are to take part in regulated activity or regulated work.
- The candidate's personal identity will be verified by checking an original form of recent photographic identification.
- Registrations will be checked with the relevant regulatory body and qualifications and training relevant to the role being recruited will be verified by checking original certificates and validating these for authenticity with the awarding body.
- A thorough biographical interview will take place to establish the candidate's employment history and identify any gaps in employment.
- A minimum of 2 written employment references will be obtained covering a minimum of the most recent 3 years employment (including the current or most recent employer) and verification will be sought for any gaps in candidate's employment history of over 3 months duration.
- All candidates will be checked against the adults and childrens' barred lists to confirm that they are not barred from participating in regulated activity / regulated work.
- An enhanced DBS check will be undertaken prior to commencement of regulated activity / regulated work and / or the DBS Register will be checked for candidates who have paid to be registered on the DBS Registration Service. Such candidates will also be required to provide the original of their enhanced DBS check for validation. As a company, we accept portability of DBS certificates and the enhanced DBS check will be renewed or the register checked every year or if there has been a gap of more than 3 months between assignments. Candidates will not be allowed to participate in regulated activity / regulated work without a valid enhanced DBS check. For candidates in Scotland we will also check that the candidate has current membership of the PGV scheme and this will be rechecked on a monthly basis.
- Candidates will be required to complete an application form which includes a declaration stating that there is no reason why they should be considered unsuitable to work with children, vulnerable persons / ADULT AT RISK OF HARM (including past disclosing disciplinary action, convictions, cautions, bind-overs, or pending cases) and that they have not been barred from carrying out regulated activity / regulated work.

INFORMING CHILDREN / VULNERABLE PERSONS / ADULTS AT RISK OF HARM OF THEIR RIGHTS

Where our services are provided on client premises (e.g. a hospital), we will operate according to the policies and procedures of that institution / organisation and it is expected that the Child / Vulnerable Person / Adult at Risk of Harm will have been informed of their rights by that institution / organisation and that the institution / organisation will provide independent support and advice to the person concerned.

IDENTIFYING POTENTIAL ABUSE

Abuse is the violation of an individual's human rights and can take the form of a single act or repeated acts. The main types of abuse include:

- Physical
- Domestic
- Sexual
- Emotional / psychological
- Financial
- Modern slavery
- Discriminatory
- Organisational
- Neglect or acts of omission
- Self-neglect

All staff, contractors and temporary workers are expected to look out for the common symptoms or indicators associated with the different types of abuse and neglect. Typical signs for each of the above include:

Physical Abuse – The signs of this are often evident; but can be hidden by both the victim and the abuser. Any unexplained injuries should always be fully investigated. Evidence to look out for includes:

- Cuts, lacerations, puncture wounds, open wounds, bruises, welts, discoloration, black eyes, burns, bone fractures, broken bones, and skull fractures.
- Untreated injuries in various stages of healing or not properly treated.
- Poor skin condition or poor skin hygiene.
- Dehydration and/or malnourished without illness-related cause.
- Loss of weight.
- Soiled clothing or bed.
- Broken eyeglasses/frames, physical signs of being subjected to punishment, or signs of being restrained.
- Inappropriate use of medication, overdosing or under-dosing.
- A person telling you they have been hit, slapped, kicked, or mistreated.

Sexual Abuse - Very often the behaviour of a person, even if they are confused, will tell you that something is wrong. Even with dementia, people can often make their feelings known to you if you take the time to listen, observe and take notice. It is the capacity to believe that sexual abuse is possible, (without automatically seeing it everywhere), that will increase the potential to detect and respond to it when it happens. Some of the physical signs to watch for are:

- Bruises around the breasts or genital area
- Unexplained STDs
- Unexplained vaginal or anal bleeding
- Difficulty in walking or standing
- Marked changes in behaviour
- Torn, stained, or bloody underclothing
- A person telling you they have been sexually assaulted or raped

If you suspect sexual abuse, do NOT wash the person or their clothing. Do NOT let time drift by while you think about your course of action. Inform this immediately to the nurse in charge of the shift and they will refer the matter to the Police as they are the experts and will have the skills, knowledge and equipment to respond appropriately and sensitively.

Emotional / Psychological Abuse - This can have a profound impact on an individual's mental health. They can feel trapped, threatened, humiliated, used or a combination of all these. Most signs therefore relate to someone's mental state, and changes in behaviour such as:

- Helplessness
- Hesitation to talk openly
- Implausible stories
- Confusion or disorientation
- Anger without apparent cause
- Sudden change in behaviour
- Emotionally upset or agitated
- Unusual behaviour (sucking, biting, or rocking)
- Unexplained fear

- Denial of a situation
- Extremely withdrawn and non-communicative or non-responsive
- A person telling you they are being verbally or emotionally abused

Neglect - This will often be manifested in the physical, social or health circumstances of the person. Examples may include:

- Dirt, faecal or urine smell, or other health and safety hazards in person's living environment
- Rashes, sores, or lice
- Inadequate clothing
- Malnourishment or dehydration
- Untreated medical conditions
- Poor personal hygiene
- Evidence of the withholding of medication or over-medication of the person
- Evidence of a lack of assistance with eating and drinking
- Unsanitary and unclean conditions

In considering neglect it is also important to recognise that there are occasions when someone will choose a particular lifestyle that is considered by others to be poor. There is a difference between a chosen pattern of behaviour and neglect by others that causes deterioration in a person's circumstances and condition. It should also be remembered that neglect can be intentional or passive (i.e. where the 'perpetrator' is doing his / her best but cannot provide the level of care and support that is needed). From the perspective of the 'victim' the impact is the same, and they experience abuse. Where abuse is intentional it is likely that the following signs will be apparent as the abuser may:

- Try to prevent the person from speaking for themselves or seeing others without them being present.
- Display attitudes of indifference or anger toward the person, or the obvious absence of assistance.
- Blame the person (e.g. accusation that incontinence is a deliberate act).
- Display aggressive behaviour (threats, insults, harassment) toward the person.
- Have a previous history of abuse of others.
- Display inappropriate affection toward the person.
- Display flirtatious behaviour, or coyness, etc that might be possible indicators of inappropriate sexual relationships.
- Create social isolation of the family, or isolation or restriction of activity of the person.
- Create conflicting accounts of incidents by family, supporters, or the person.
- Display inappropriate or unwarranted defensiveness.

Financial Abuse – The signs of financial abuse may include:

- Signatures on cheques etc that do not resemble the person's signature or signed when the person cannot write.
- Sudden changes in bank accounts, including unexplained withdrawals of large sums of money by a person accompanying the older person.
- The inclusion of additional names on an older person's bank account.
- Abrupt changes to, or the sudden establishment of, wills.
- The sudden appearance of previously uninvolved relatives claiming their rights to a person's affairs or possessions.
- The unexplained sudden transfer of assets to a family member or someone outside the family.
- Numerous unpaid bills, or overdue rent, when someone else is supposed to be paying the bills.
- Unusual concern by someone that an excessive amount of money is being expended on the care person's care.

- Lack of amenities, such as TV, personal grooming items, appropriate clothing, that the person should be able to afford.
- The unexplained disappearance of funds or valuable possessions such as art, silver or jewellery.
- Deliberate isolation of a person from friends and family, resulting in one particular individual having total control.

SAFEGUARDS & ARRANGEMENT TO ENSURE STAFF ARE AWARE OF THE ISSUES & PROCESSES

The company requires its employees, contractors and temporary workers to follow all the instructions, guidance, policies and procedures provided by the participating authority. Induction training will also be provided to all employees, contractors and temporary workers engaged to undertake regulated activity with Children / Vulnerable Persons or regulated work with Children / Adults at Risk of Harm, including but not limited to:

- Training in relation to safeguarding and handling of reporting of alleged or suspected abuse / harmful behaviour.
- Risk management to prevent abuse / harmful behaviour.
- Actions to be taken in the event of alleged or suspected abuse.
- The company's complaints and escalation process.
- The company's Whistleblowing policy.
- Current legislation and best practice.

All employees, contractors and temporary workers will be appropriately supervised.

CONFIDENTIALITY & RECORD KEEPING

In most cases, confidentiality will mean that information relating to alleged or suspected abuse is only passed onto others with the consent of the Service User, however it should be recognised that in order to protect Children, Vulnerable Persons and Adults at Risk of Harm it may be necessary on occasion to share information that might normally be regarded as confidential in order to investigate an alleged or suspected offence, particularly if the individual / individuals are in serious danger or are incapable of making an informed decision.

All staff, contractors and temporary workers are required to abide by our Confidentiality Policy and will receive training in this area prior to commencing the job / their first assignment.

England, Wales & Northern Ireland

Definitions

VULNERABLE PERSON

The definition of a vulnerable person is a person aged 18 or over and who has needs for care and support; and is experiencing or is at risk of abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

CHILD

A person who has not yet reached their 18th birthday.

REGULATED ACTIVITY

An individual is engaged in regulated activity if they are providing any of the following activities as part of their role:

- Healthcare
- Personal care
- Social work
- Assistance with cash, bills or shopping
- Assistance with the conduct of their own affairs
- Conveying services

In addition, regulated activity also includes where an individual is providing “unsupervised” teaching, training, supervision, caring for or supervision of vulnerable persons where these activities are undertaken frequently. Frequently is determined as:

- Once a month or more
- Three or more days in any 30-day period
- Overnight between the hours of 2am and 6am

RELEVANT CONDUCT

Relevant conduct is an action or inaction that has harmed or placed a vulnerable person at risk of harm. Relevant conduct in relation to vulnerable persons is conduct which:

- Endangers a person or is likely to them.
- If repeated against or in relation to a vulnerable person, would endanger them or would be likely to endanger them.
- Involves sexual material relating to children (including possession of such material).
- Involves sexually explicit images depicting violence against a person (including possession of such images), if it appears to DBS that the conduct is inappropriate.
- Is of a sexual nature involving a vulnerable person, if it appears to DBS that the conduct is inappropriate.

Specific examples of relevant conduct include:

- Psychological / emotional harm caused by an action or inaction that causes mental anguish.
- Financial harm usually associated with the misuse of money, valuables or property.
- Physical harm caused by any physical action or inaction that results in discomfort, pain or injury.
- Sexual harm such as coercion or force to take part in sexual acts.
- Neglect caused by failure to identify and / or meet care needs.
- Verbal harm which includes any remark or comment that causes distress.

HARM

All forms of ill-treatment and impairment of, or an avoidable deterioration in physical or mental health and impairment of physical, intellectual, emotional, social or behavioural development.

HARM TEST

To satisfy the harm test there needs to be credible evidence of a risk of harm such as statements made by an individual regarding conduct/behaviour, etc. For a case to be considered as a risk of harm, relevant conduct would not have occurred but there must be tangible evidence rather than a “feeling” that a person represents a risk.

REPORTING & RESPONSE TO SUSPECTED, ALLEGED OR CONFIRMED CASES OF ABUSE

Please note that you should always follow the Safeguarding Policy where you are placed to work and if you are unsure where to find this, please contact the nurse in charge of the shift. Any employee, contractor, temporary worker, family member, carer, healthcare professional or any other individual with concerns about possible abuse should report the matter to the nurse in charge of the shift. Where it is suspected that such abuse may be caused by another staff member, then reporting the matter will be done in accordance with the company's Whistleblowing Policy.

The company expects its employees, contractors and temporary workers to take all possible steps to co-operate with investigations by any statutory bodies such as the participating authority, CQC Investigating Inspectors, RQIA, relevant regulatory body (e.g. NMC), DBS or Disclosure Scotland and the Police if involved.

Scotland

ADULT AT RISK OF HARM

The Adult Support and Protection Act 2007 defines adults at risk as those aged 16 years or over who:

- are unable to safeguard their own wellbeing, property, rights or other interests
- and are at risk of harm
- and because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected

CHILD

The Children's Hearings (Scotland) Act 2011 contains the current provisions relating to the operation of the Children's Hearings system and child protection orders.

Section 199 states that, for the purposes of this Act, a child means a person under 16 years of age.

- However, this section also provides some exceptions to that general rule. Subsection (2) provides that for the purposes of referrals under section 67(2)(o) (failure to attend school), references in the Act to a child include references to a person who is school age. "School age" has the meaning given in section 31 of the Education (Scotland) Act 1980.
- Additionally, children who turn 16 during the period between when they are referred to the Reporter and a decision being taken in respect of the referral, are also regarded as "children" under the Act. Children who are subject to compulsory measures of supervision under the Act on or after their 16th birthday are also treated as children until they reach the age of 18, or the order is terminated (whichever event occurs first).
- Where a sheriff remits a case to the Principal Reporter under section 49(7)(b) of the Criminal Procedure (Scotland) Act 1995, then the person is treated as a child until the referral is discharged, any compulsory supervision order made is terminated, or the child turns 18.

MENTAL HEALTH CARE AND TREATMENT (SCOTLAND) ACT 2003

- Applies to people who have a mental illness, learning disability, or related condition. The Act calls this mental disorder.
- Most of the time, when people become unwell, they understand that they need treatment. But sometimes people are unable, or unwilling, to agree to treatment. The Mental Health Act sets out:
 - When and how people can be treated if they have a mental disorder.
 - When people can be treated or taken into hospital against their will.
 - What a person's rights are, and the safeguards which ensure that these rights are protected.
- In June 2017 changes were made to the existing Act and can be found at: https://www.mwcscot.org.uk/media/376776/guidance_for_mental_health_professionals_on_changes_to_the_mental_health_act.pdf

ADULTS WITH INCAPACITY (SCOTLAND) ACT 2000

The Adults with Incapacity (Scotland) Act 2000 provides a framework for safeguarding the welfare and managing the finances of adults (people aged 16 or over) who lack capacity due to mental illness, learning disability, dementia or a related condition, or an inability to communicate.

All our candidates are issued with a copy of the following good practice guide prior to deployment in Scotland: https://www.mwcscot.org.uk/media/339351/awi_in_general_hospitals_and_care_homes.pdf

REGULATED WORK

Regulated work (as defined by Schedules 2 and 3 of the Protection of Vulnerable Groups (Scotland) Act 2007) is usually jobs including:

- Caring responsibilities.
- Teaching or supervising children and/or adult at risk of harm.
- Providing personal services to children and/or adult at risk of harm.
- Having unsupervised contact with children and/or adult at risk of harm.

HARMFUL BEHAVIOUR THAT SHOULD BE REFERRED

The following are examples of harmful behaviour which should be referred:

- Harming a child or adult at risk of harm
- Placing a child or adult at risk of harm
- Inappropriate behaviour involving pornography
- Inappropriate behaviour of a sexual nature involving a child or adult at risk of harm
- Giving inappropriate medical treatment to a child or adult at risk of harm

TYPES OF HARM

There are a number of different ways 'harm' can be defined. It's also important to bear in mind that people can cause a risk of harm without actually doing anything directly. Examples of harm include:

- Physical harm (like inappropriate physical restraint or assault).
- Psychological harm (like emotional abuse or placing an individual in a state of fear alarm or distress).

- Damage to property, rights or interests, such as theft, fraud, embezzlement or extortion.

Examples of behaviour which lead to a risk of harm include:

- Attempting to harm (even if they don't succeed).
- Trying to make someone else cause harm.
- Encouraging someone to self-harm.
- Reckless behaviour or incompetence that may cause someone to be harmed as a result, even if they didn't mean it to.

REPORTING & RESPONSE TO SUSPECTED, ALLEGED OR CONFIRMED CASES OF ABUSE

We are legally obliged in certain circumstances (known as referral grounds) to submit referrals on individuals to Disclosure Scotland as contained within section 9 of the Protection of Vulnerable Groups (Scotland) Act 2007. The obligation to refer to Disclosure Scotland exists irrespective of involvement of other agencies (e.g. police, NMC, local authorities etc). We will follow the local area protection and interagency guidelines.

We will always refer if we become aware that an individual has:

- Harmed a child or adult at risk of harm (see “types of harm” defined previously).
- Placed a child or adult at risk of harm at risk of harm (which may include behaviour of incompetence that may cause someone to be harmed, even if this is unintentional and/or harm does not actually occur).
- Been involved in inappropriate behaviour involving pornography.
- Been involved in inappropriate behaviour of a sexual nature involving a child or adult at risk of harm.
- Given inappropriate medical treatment to a child or adult at risk of harm.

This list is not exhaustive, and the conduct does not need to have happened in the workplace but must be something that we become aware of that subsequently leads to:

- Dismissal as a result.
- The person involved would have been dismissed but left before they could be (including resignation, withdrawing contact with us or after starting but not concluding a disciplinary process or if the individual's probation or fixed term contract was not extended because of the conduct.
- Was transferred permanently (i.e. not just while under investigation) from regulated work with children / adult at risk of harm to a role within the organisation that does not involve regulated work with these groups.

Staff have the following responsibilities:

Job Title	Reporting/Referral Responsibility	Timescale
Registered Manager	Support the Clinical Nurse Manager with investigation into allegations of harmful behaviour. Complete the referral process to Disclosure Scotland. Report any adult protection concerns to Care Inspectorate.	Within 3 months of the date of the decision to remove the individual from regulated work or the date that they would have been permanently removed had they not otherwise left.*

Clinical Nurse Manager	Check with the nurse in charge of the relevant setting that the matter has been reported to the relevant Local Authority and or Police. Investigate and record allegations of harmful behaviour and make a decision as to whether to suspend (pending further investigation), transfer permanently or dismiss the nurse(s) involved. Report any harmful behaviour that might affect whether the person is allowed to work with children or adult at risk of harm to the nurse in charge of the relevant setting, who should take steps to report the matter to the relevant Local Authority and or Police, if there is a reason to believe that a crime has been committed. Where an agency nurse has reported an adult or child protection concern they must also report the concern to ourselves, specifically the Clinical Nurse Manager. The Clinical Nurse Manager will take steps to make sure that an appropriate referral has been made by the placement and if no referral has been made the agency should make the referral directly.	Immediately
Recruitment Consultants	Report any harmful behaviour that might affect whether the person is allowed to work with children or adult at risk of harm to the Clinical Nurse Manager.	Immediately
Nurses	Report any harmful behaviour that might affect whether the person is allowed to work with children or adult at risk of harm to the Nurse in Charge/ Safeguarding Lead of the setting they are working in and the Clinical Nurse Manager. Our Nurses must ensure that, following this report, the Nurse in Charge/ Safeguarding Lead must inform the Local Authority where the person is currently living. They then have a duty to inquire into adult protection where it is believed that measures of protection may be required. If there is a belief that crime may have been committed then the police must also be informed- this can be done either by the Nurse in Charge/ Safeguarding Lead or agency staff. Thus, each placement must make an appropriate adult protection referral although the nurse can report the concern directly to the Local Authority.	Immediately

	Nurses can also report their concerns directly to the Local Authority- a complete list of authorities are in the appendices of this policy.	
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*Even if the individual appeals against one of the above decisions, the three-month period begins on the date of the original decision.

The referral will take place irrespective of whether the regulated work is being carried out for us or for another organisation, however it must be in relation to the group that the individual is in regulated work with (e.g. if the regulated work is only in relation to adult at risk of harm and the issue relates to assaulting a child, it is not possible under current legislation to refer that individual to Disclosure Scotland).

We will also make a referral if we believe that a person who is doing or has done regulated work has been involved in harmful behaviour and based on this we have decided not to place them in regulated work.

Notifiable Events

There are a number of incidents/ events that nursing agencies must report directly to the Care Inspectorate. Specifically pertaining to safeguarding Direct Healthcare plc will follow the following protocols:

Circumstances	Services Covered	Information Required	Timescale
Allegation of abuse in relation to a person using a service.	All Services	Report all allegations of abuse (as defined in adult support and protection and child protection legislation) involving someone using a service, including: • details of occurrence • persons involved (initials only) • actions taken.	Report Immediately
Adverse event involving a schedule 2, 3, 4, 5 controlled drug	All Services	• Prescribing or dispensing error by e.g. pharmacy or doctor/dentist • Prescribed medication not available to be administered • Person given wrong medication or dose	Within 2 hours

		• Medication not recorded as given and no recorded explanation or justification • Medication incident/error resulting in injury, referral to the police or Procurator Fiscal • Medication incident/error requiring input or advice from healthcare professional, resulting in hospital admission, or considered as an adult or child protection matter. • Medication incident/error: 'near miss' that could have led to injury of harm • Medication missing or stolen • Medication or controlled drug records falsified • Staff referred to professional registration body re: medicines management • Staff left during or before investigation re: missing or stolen medication • Staff left during or before investigation re: poor practice	
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(An exhaustive list of reportable events can be found at:

[http://www.careinspectorate.com/images/documents/2611/Records%20that%20all%20registered%20care%20services%20\(except%20childminding\)%20must%20keep%20and%20guidance%20on%20notification%20reporting%20\(V6\).pdf](http://www.careinspectorate.com/images/documents/2611/Records%20that%20all%20registered%20care%20services%20(except%20childminding)%20must%20keep%20and%20guidance%20on%20notification%20reporting%20(V6).pdf))

Referral Process

We will download the Employer Referral Form from the Disclosure Scotland website at <https://www.mygov.scot/pvg-employer-referral/>. The form requires the following information to be provided:

- Proof of the person's identity (name, address, date of birth, national insurance number).
- Details of the type of “regulated work” they're employed or engaged to do.
- The person's PVG scheme number.
- Information on the harmful behaviour.
- Details and documentation relevant to the employer's investigation and outcome.

The referral must not identify any child or adult at risk of harm by name (including victims and witnesses) and should use a coded reference (e.g. Adult at Risk of Harm A, aged 47).

The completed Employer Referral Form should then be emailed to pucorrespondence@disclosurescotland.gsi.gov.uk or can be printed out and posted via recorded deliver to:

Disclosure Scotland PVG Referrals
PO Box 7412
Glasgow
G51 9DX

Contents should be double bagged with the innermost bag being marked “Restricted – to be opened by authorised staff in Disclosure Scotland only”.

Disclosure Scotland's Protection Unity and Customer Engagement Team will provide advice on whether a specific situation means a referral should be submitted. They can be contacted on 0300 0200 040.

NHS Scotland Boards and NHS Special Boards

NHS Scotland consists of 14 regional NHS Boards which are responsible for the protection and improvement of their population's health and for the delivery of frontline healthcare services and 7 Special NHS Boards and 1 public health body who support the regional NHS Boards by providing a range of important specialist and national services. We will also follow their advice, best practice and interagency guidelines. Contact details for each of these can be found by clicking the relevant link on: <http://www.scot.nhs.uk/organisations/>.

- NHS Ayrshire & Arran
- NHS Borders
- NHS Dumfries & Galloway
- NHS Fife
- NHS Forth Valley
- NHS Grampian
- NHS Greater Glasgow & Clyde
- NHS Highland
- NHS Lanarkshire
- NHS Lothian

- NHS Orkney
- NHS Shetland
- NHS Tayside
- NHS Western Isles

Special NHS Boards

[NHS Education for Scotland](#)

Quality Education for a Healthier Scotland.

[NHS Health Scotland](#)

Promoting ways to improve the health of the population and reduce health inequalities.

[NHS National Waiting Times Centre](#)

Ensuring prompt access to first-class treatment.

[NHS24](#)

Providing health advice and information.

[Scottish Ambulance Service](#)

Responding to almost 600,000 accident and emergency calls and taking 1.6 million patients to and from hospital each year.

[The State Hospitals Board for Scotland](#)

Providing assessment, treatment and care in conditions of special security for individuals with a mental disorder whom because of their dangerous, violent or criminal propensities, cannot be cared for in any other setting.

[NHS National Services Scotland](#)

Supplying essential services including health protection, blood transfusion and information.

Policy Review

This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.

Appendix 1

Reporting Safeguarding: Adult at Risk of Harm Locality Register

Edinburgh, East and Fife:

City Of Edinburgh:

Address:

- Adult Protection, Social Care Direct,
City of Edinburgh Council,
West Wing,
South Neighborhood Office,
40 Captains Road,
Edinburgh,
EH17 8QF

Telephone Number:

- Office Hours: 0131 200 2324
- Out of Hours: 0800 731 6969
- Public Protection Unit: 0131 316 6600

Email:

- socialcaredirect@edinburgh.gov.uk

East Lothian:

Address:

- Adult Protection,
Randall House,
Macmerry,
East Lothian,
EH33 1RW

Telephone Number:

- Office Hours: 01875 824 309
- Out of Hours: 0800 731 6969

Email:

- communityaccessteam@eastlothian.gov.uk

Fife:

Address:

- Adult Protection,
Rothesay House,
5th Floor,
Rothesay Place,
Glenrothes,
KY7 5PQ

Telephone Number:

- 01383 602200

Midlothian:

Address:

- Adult and Social Care,
Fairfield House,
8 Lothian Road,
Dalkeith,
EH22 3ZH

Telephone:

- Office Hours: 0131 271 3900
- Out of Hours: 0800 731 6969

Email:

- ACCDutyTeamAdmin@midlothian.gov.uk

West Lothian:

Address:

- Social Policy,
West Lothian Civic Centre,
Howden South Road,
Livingston,
EH54 6FF

Telephone:

- Office hours: 01506 776700
- Out of hours telephone: 01506 280000

Glasgow & West: Argyll and Bute:

Address:

- Adult Care,
- Helens burgh and Lomond Civic Centre,
- 38 East Clyde Street,
- Helens burgh,
- G84 7PG

Telephone:

- Office Hours: 01546 605517
- Out of Hours: 01631 566491 or 01631 569712

Email:

- Adultprotection@argyll-bute.gov.uk

East Ayrshire:

Address:

- Social Services Headquarters,
9 Balmoral Road,
Kilmarnock,
East Ayrshire,
KA3 1HL

Telephone:

- Office hours: 01563 554200 or 01290 427720
- Out of hours: 0800 328 7758

Email:

- SocialWorkCustomerFirst@east-ayrshire.gov.uk

East Dunbartonshire:

Address:

- Adult Duty Team,
Kirkintilloch Health and Care Centre,
10 Saramago Street,
Kirkintilloch,
G66 3BF

Telephone:

- Office Hours: 0300 123 4510
- Out of office hours: 0300 343 1505

Email:

- socialwork@eastdunbarton.gov.uk

East Renfrewshire:**Address:**

- Adult Support and Protection Team,
1 Brunfield Avenue,
Giffnock,
G46 7TL

Telephone:

- Office Hours: 0141 577 3777
- Out of Office: 0800 811 505

Email:

- adultprotection@eastrenfrewshire.gov.uk

Glasgow City:**Address:**

- Adult Protection,
220 High Street,
Glasgow,
G4 0QW

Telephone:

- Office Hours: 0141 287 0555
- Out of hours: 0300 343 1505

Email:

- socialcaredirect@glasgow.gov.uk

Inverclyde:

Address:

- Assessment and Care Management,
Hector McNeil House,
7-8 Clyde Square, Greenock,
PA15 1NB

Telephone:

- Office hours: 01475 715365 or 715010
- Out of hours homecare: 01475 715952
- Out of hours social work: 0300 343 1505

Email:

- HSCP.Communications@ggc.scot.nhs.uk

North Ayrshire:

Address:

- Social Services, 4th Floor,
West Wing,
Cunningham House,
Friarscroft,
Irvine,
KA12 8EE

Telephone:

- Office Hours: 01294 310300
- Out of hours: 0800 328 7758

Email:

- adultprotection@north-ayrshire.gcsx.gov.uk

North Lanarkshire:

Address:

- Coatbridge Social Work Locality
Kildonan Street

Coatbridge
ML5 3BT

Telephone:

- Office Hours: 01236 622100
- Out of Hours: 0800 1214114

Email:

- CoatRecServices@northlan.gov.uk

Renfrewshire:

Address:

- Renfrewshire Health and Social Care Partnership 3rd Floor,
Renfrewshire House,
Cotton Street,
Paisley,
PA1 1UU

Telephone:

- Office Hours: 0300 300 1380

Email:

- adultservicesreferral.sw@renfrewshire.gov.uk

South Ayrshire:

Address:

- Adult Support and Protection,
Burns House,
Burns Statue Square, Ayr,
KA7 1UT

Telephone:

- Office Hours: 01292 612055

Email:

- asp@south-ayrshire.gov.uk

South Lanarkshire:

Address:

- The Public Protection Unit,
Regent House,
9 High Patrick Street,
Hamilton,
ML3 7ES

Telephone:

- Office Hours: 0303 1231008

Email:

- alistair.walker@southlanarkshire.gsx.gov.uk

West Dunbartonshire:

Address:

- Adult Support and Protection,
118-120 Dumbarton Road,
Clydebank,
G81 1UG

Telephone:

- Office hours: 01389 757020
- Out of Hours: 01389 5622457

Email:

- wdadult@wdc.gcsx.gov.uk

Highlands & Islands: Highland:

Address:

- Highland Adult Support and Protection Committee,
Assynt House,
Beechwood Park,
Inshes,
Inverness,
IV2 3BW

Telephone:

- Office hours: 0800 9020042

North East, Orkney & Shetland:**Aberdeen City:****Address:**

- Social Care and Wellbeing,
First Floor North,
Business Hub 8,
Marischal College,
Broad Street,
Aberdeen,
AB10 1AB

Telephone:

- Office hours: 0800 731 5520
- Out of office hours: 0800 7315520

Email:

- Duty@aberdeencity.gov.uk

Aberdeenshire:**Address:**

- Adult Protection Network,
Oldmeldrum Business Centre,
Colpy Road Industrial Estate,
Oldmeldrum,
AB51 0BZ

Telephone:

- Office hours: 01467 533100
- Out of office hours: 03456 08 12 06

Email:

- adultprotectionnetwork@aberdeenshire.gov.uk

Moray:**Address:**

- Adult Protection Unit,
Glasgreen Centre,
Thornhill Drive,
Elgin,
IV30 6GQ

Telephone:

- Office hours: 0300 123 0897

Email:

- adultprotection@moray.gov.uk

Orkney Islands:

Address:

- Community Social Service,
School Place,
Kirkwall,
KW15 5PH

Telephone:

- 01856 873535

Email:

- asw@orkney.gsx.gov.uk

Shetland Islands:

Address:

- Shetland Adult Protection Committee,
Old Library,
Hillhead,
Lerwick,
Shetland,
ZE1 0EL

Telephone:

- Office Hours: 01595 744400

- Out of hours: 01595 695611

Email:

- kate.gabb@shetland.gov.uk

South Scotland:

Dumfries and Galloway:

Address:

- Adult Support and Protection,
Adult Protection 122/124 Irish Street
Dumfries
DG1 2PB

Telephone:

- Office hours: 030 33 33 3001

Email:

- adultforms@dumgal.gov.uk

Scottish Borders:

Address:

- Council Headquarters,
Newtown St Boswells,
Melrose,
TD6 0SA

Telephone:

- Office hours: 0300 100 1800
- Out of office hours: 01896 752111

Email:

- sw.apu@scotborders.gcsx.gov.uk

Tayside & Central:

Angus:

Address:

- Forfar ACCESS Office,
Municipal Buildings,
Castle Street,
Forfar,
DD8 3AF

Telephone:

- Office hours: 03452 777 778
- Out of office hours: 01382 307964

Email:

- apc@angus.gov.uk

Clackmannanshire & Stirling

Address:

- Clackmannanshire and Stirling
Health and Social Care Partnership
Kilncraigs Building
Greenside Street
Alloa
FK10 1EB

Telephone:

- Office Hours: 01259727010
- Out of hours: 0845 277 7000

Email:

- cart@clacks.gcsx.gov.uk

Dundee City:

Address:

- Adult Protection,
Dundee House,
Floor 2,
50 North Lindsay Street,
Dundee,
DD1 1NF

Telephone:

- Office hours: 01382 434019
- Out of office hours: 01382 307964

Falkirk:

Address:

- Adult Support and Protection,
Denny Town House,
Glasgow Road,
Denny,
FK6 5DL

Telephone:

- Office hours: 01324 506400
- Out of office hours: 01786 470500

Email:

- asp@falkirk.gov.uk

Perth & Kinross

Address:

- Community Care Access Team,
Pullar House,
35 Kinnoull Street,
Perth,
PH1 5GD

Telephone:

- Office hours: 0345 30 111 20

Email:

- accessteam@pkc.gov.uk

Stirling:

Address:

- Adult Assessment and Partnership
Social Work Department
Wolfcraigs
7/13 Dumbarton Road
Stirling
FK8 2LQ

Telephone:

- Office hours: 01786233759
- Out of hours: 01798 470500

Email:

- intakecomcare@stirling.gcsx.gov.uk

Appendix: Reporting Safeguarding: Children's Locality Register**Aberdeen City Council:**

- 01224 306877 (Joint Child Protection Team).
- 0800 731 5520 (Emergency Out of Hours).
- 101 (Police Scotland).

Aberdeenshire Council:

- Evenings & Weekends call the Out of Hours Service on 03456 08 12 06.
- Police Emergency 999.
- Non-Emergency 101.
- Designated Doctor/Nurse Consultant in Child Protection Tel: 01224 551706 during office hours.
- Out of hours or urgent referrals: Royal Aberdeen Children's Hospital & Dr Gray's Hospital, Tel: 0845 456 6000.

Angus Council:

- Police Scotland – 101.
- NSPCC - 0808 800 5000.
- ACCESS Line 03452 777 778.

Argyll and Bute Council:

- Police: 999
- Scottish Children's Reporter: 0300 200 1437.
- Contact Social Work: 01546 605517 (Monday to Friday 9am to 5pm).

Clackmannanshire Council:

- Social Services: Day Time (01259 225000) Night Time/ Weekends (01786 470500).
- Police: 999.
- Police Non-Emergency: 101.
- Scottish Children's Reporter Administration: 0300 200 1555

Comhairle Nan Eilean Siar Council:

- Duty Officer, St Lennan's Centre, Stornoway 01851 822749
- Duty Officer, Lionacleit Education Centre 01870 604880
- Faire (Out of Hours) 01851 701702

Dumfries & Galloway:

- Children's MASH 030 33 33 3001.
- Out of hours service - call 01387 273660
- Police non-emergency line - call 101

Dundee City Council:

- Call 999.
- Dundee Child Protection Committee – 01382 307999

East Ayrshire Council:

- Ayrshire Urgent Care Service – 01563 554200 East Dunbartonshire Council:
- East Dunbartonshire's Advice and Response Team - 0141 777 3000
- Out of Hours Social Work Standby Service - 0300 343 1505.
- ChildLine - 0800 1111
- Scottish Children's Reporters Administration - 0131 244 8201
- NSPCC - 0800 800 5000
- Police Scotland – 101

East Lothian Council:

- The Emergency Social Care Service by calling 0800 731 6969 (free phone) at any time normal office hours (Mon-Thu 5pm- 8:30am, weekends from Friday 3:55pm-8:30am)
- The Police by calling 101 (or in an emergency 999)
- A member of staff at the child's school
- Any health professional.

East Renfrewshire Council:

- Lead Officer Child Protection -0141 451 0755
- Out of hours – 0300 343 1505
- Police Scotland – 1010 or 999

Edinburgh Council:

- 999 or 101
- 0131 200 2324 (social direct Edinburgh)

Falkirk Council:

- Monday-Friday: 01324 506070
- All other times: 01786 470500
- Emergency: 999
- Not emergency: 101

Fife Council:

- Social Work on 03451 551503 or e-mail sw.contactctr@fife.gov.uk
- If you need advice in the evening or at weekends, contact a social worker on the Out of Hours number 03451 550099

Glasgow City Council:

- During office hours, you can contact Social Care Direct by phone (0141 287 0555), text or phone 18001 0141 276 4710 or email Social Care Direct.
- Out of office hours you can phone Glasgow and Partners Emergency Social Work Services on Phone 0300 343 1505.
- You can also phone Scottish Police non-emergency on 101.

The Highland Council:

- Out of office hours: 08457 697284.
- 999 in emergencies.

Inver Clyde Council:

- Social Work (out of hours) – 0300 343 1505.
- ChildLine: 0800 11 11.
- Parent line Scotland: 08000 28 22 33.
- Police Scotland: 101.
- Emergency 999. Midlothian Council:
- Phone the Children's Services duty team on 0131 271 3413 (office hours) or 0800 731 6969 (out of hours).
- Phone the Police on 101 or in an emergency 999.
- Speak to a member of staff at the child's school.
- Speak to any Health professional.

Moray Council:

- 01343 563424. (Moray Child Protection Committee).

North Ayrshire Council:

- 01294 310300 (Monday to Thursday 9am to 4:45pm and Friday 9am to 4:30pm).
- Out of hours service on 0800 328 7758.
- If the child is in immediate danger contact the police by telephoning 101 or in an emergency 999.

North Lanarkshire Council:

- If the child is in immediate danger you should contact the police (999). Orkney Islands Council:
- Contact Orkney Health and Care Children and Families Services on 01856873535.
- During normal office hours Monday to Friday, 09:00 - 17:00.
- In case of an emergency, out of office hours, contact 01856888000.

Perth & Kinross Council:

- Child Protection & duty Team (24 Hours): 01738 476768.
- Police Non-emergency: 101.
- Emergency: 999.
- NHS 24: 111.
- ChildLine 0800 1111.
- Crime stoppers Scotland 0800 555 111.

Renfrewshire Council:

- Social Work General - 0300 300 1199.
- Evenings and weekends - 0300 343 1505.
- Police Scotland – 101.

Scottish Borders Council:

- You can call us on 01896 662787.
- Out of office hours (covers all areas) - Tel: 01896 752111.

South Ayrshire Council:

- Child Line - 0800 1111.
- Crime Stoppers - 0800 555 111.
- Parent line Scotland - 08000 28 2233.
- Emergency- 999.

South Lanarkshire Council:

- If you have any concerns about the welfare or safety of a child, please contact your local social work office, the Police or their school or nursery now.

Shetland Islands Council:

- Duty Social Worker - office hours - 01595 744421.
- Emergency Social Worker - out of hours - 01595 695611.
- Police - 01595 692110 (in an emergency, dial 999).
- Children's Reporter - 0300 200 2200.

Stirling Council:

- You believe a child or young person is at immediate risk of harm, please call 999 and ask for the Police.
- If you are concerned about a child, you can contact us to report child protection concerns or contact your health visitor, teacher, nursery worker, family doctor, social worker, police officer or children's reporter.

West Dunbartonshire Council:

- Clydebank area - 0141 562 8800.
- Dumbarton area - 0141 562 8888.
- Out of Hours - 0300 343 1505, Glasgow and Partners Social Work Emergency Service.

West Lothian Council:

- Social work emergency out of hours contact number - 01506 281028 or 281029.