

## Verification of Suitability and Safeguarding of Vulnerable Persons (Adults and Children) Policy

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<b>Policy Contact</b>	Matthew Betteridge
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<b>Target Audience</b>	All employees, temporary workers and contractors
<b>Approved by</b>	OneCall24 Policy Team

OneCall24 Limited (OneCall24) understands that they have a duty to ensure that all of its workers are suitable to work with vulnerable persons and that all reasonable steps are taken to safeguard the individuals in their care.

The organisation adopts a zero-tolerance approach to abuse, neglect, and exploitation of vulnerable individuals. This policy also provides clear operational guidance to workers on how to recognise, respond to, record, and report safeguarding concerns.

While OneCall24 is not directly regulated by the Care Quality Commission (CQC), it aligns its safeguarding practices with nationally recognised standards, NHS Employment Check Standards, and applicable UK legislation.

This requires OneCall24 to ensure that at all times it adheres to all current (and any future) regulations & Legislation, including (but not limited to):

- Safeguarding Vulnerable Groups Act 2006;
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014;
- The Care Act 2014;
- the Care Quality Commission (Registration) Regulations 2009

In order to achieve this, OneCall24 has incorporated a detailed and robust policy & process which ensures all necessary checks are completed on workers, and all workers are fully aware of their obligations and responsibilities when out in the field.

To confirm this, OneCall24 will maintain accurate, secure, and auditable records of all safeguarding and employment checks carried out under this framework. This information will be requested and called upon during regular framework audit. This includes:

- **Identity** checks, at all times in line with latest NHS Employment Check Standards (see <https://www.nhsemployers.org/publications/identity-checks-standard>); and
- **Right to Work** checks, at all times in line with latest NHS Employment Check Standards (see <https://www.nhsemployers.org/publications/right-work-checks-standard>); and
- **Employment History and Reference** checks, at all times in line with latest NHS Employment Check Standards (see <https://www.nhsemployers.org/publications/employment-history-and-reference-checks-standard>); and

- **Professional Registration & Qualification** checks, at all times in line with latest NHS Employment Check Standards (see <https://www.nhsemployers.org/publications/professional-registration-and-qualification-checks-standard>); and
- **Criminal Record and Barring** checks, at all times in line with latest NHS Employment Check Standards (see <https://www.nhsemployers.org/publications/criminal-record-checks-standard>). The following additional DBS checks: guidance for employers may also be useful <https://www.gov.uk/dbs-check-requests-guidance-for-employers>; and
- **Work Health Assessment** checks, at all times in line with latest NHS Employment Check Standards (see <https://www.nhsemployers.org/publications/work-health-assessments-standard>); and
- **English language competency** checks, at all times in line with the Nursing and Midwifery Council (see <https://www.nmc.org.uk/registration/joining-the-register/english-language-requirements/>)
- **Statutory & Mandatory and Clinical/Care core skills training** checks, at all times in line with latest Skills for Health UK Core Skills Training Framework (see <https://www.skillsforhealth.org.uk/services/item/146-core-skills-training-framework>) and relevant to the normal duties of that person is expected to perform in the position the Authority seeks to fill. All safeguarding training must be completed at induction and refreshed regularly in line with national guidance and role requirements (typically every three years or as specified by the client or framework); and
- **Appraisal and revalidation** checks, at all times in line with the seven (7) key principles and core values that guide the NHS. See latest:
  - Nursing and Midwifery Council’s Code: Professional standards of practice and behaviour for nurses and midwives (see <https://www.nmc.org.uk/standards/>) and revalidation (see <https://www.nmc.org.uk/revalidation/>), where the Job Role of the Temporary Agency Worker supplied for hire relates to Nursing and Midwifery staff Assignments; or
  - General Medical Council’s Standards and ethics guidance for doctors (see <https://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors>) and Good Medical Practice framework for appraisal and revalidation (see <https://www.gmc-uk.org/registration-and-licensing/managing-your-registration/revalidation/guidance-on-supporting-information-for-revalidation>), where the Job Role of the Temporary Agency Worker supplied for hire relates to Medical staff Assignments; or
  - General Dental Council’s Standards for the Dental Team (<https://www.gdc-uk.org/standards-guidance/standards-and-guidance/standards-for-the-dental-team>), where the Job Role of the Temporary Agency Worker supplied for hire relates to dental staff Assignments; or
  - Health and Care Profession Council’s Standards (see <https://www.hcpc-uk.org/standards/standards-of-conduct-performance-and-ethics/>), where the Job Role of the Temporary Agency Worker supplied for hire relates to Other clinical staff Assignments; or
  - NHS Employers guidance on appraisal (see <https://www.nhsemployers.org/system/files/2021-07/Appraisals-and-KSF-made-simple.pdf>); and
  - Other Good Industry Practice, where the Job Role of the Temporary Agency Worker supplied for hire is not covered by an appropriate Professional Body, such as GCC or GDC or GMC or GPhC or GOC or GOSC or HCPC or NMC etc.

- Indemnity arrangement checks, at all times in line with the Health Care and Associated Professions (Indemnity Arrangements) Order 2014 (Statutory Instrument 2014 No. 1887) (see <https://www.legislation.gov.uk/ukdsi/2014/9780111114483>); and
- any other safeguarding and employment checks, as may be supplemented by information set out and [or] referred to in the individual Order by the Hirer or which are required by law or the appropriate Professional Body.

Should it be requested by the participating authority, additional checks will be completed on a worker prior to their deployment into the provision of the services.

All checks will be reviewed periodically, and workers are required to declare any changes in their circumstances that may affect their suitability to work with vulnerable persons.

All workers have a duty to report any safeguarding concerns immediately.

Workers must:

- Report concerns to their line manager or the Safeguarding Lead without delay
- Ensure immediate safety where there is a risk of harm
- Contact emergency services where there is an immediate danger
- Accurately record all concerns, including dates, times, and observations

Workers must not investigate concerns themselves or delay reporting. Failure to report concerns may result in disciplinary action.

### **Safeguarding Procedure: What To Do If You Have a Concern**

All staff must follow the process below:

- a) Recognise  
Be alert to signs of abuse, neglect, or disclosure.
- b) Respond  
Remain calm and listen  
Do not promise confidentiality  
Reassure the individual
- c) Report  
Inform your line manager or Safeguarding Lead immediately  
If urgent, contact emergency services
- d) Record  
Document factual information only  
Include dates, times, and observations
- e) Escalate  
The Safeguarding Lead will refer to the appropriate authority (Local Authority, LADO, or Police)

### **Safeguarding Roles and Responsibilities**

The Safeguarding Lead is responsible for:

- Managing safeguarding concerns and referrals
- Liaising with local authorities and external agencies
- Maintaining safeguarding records
- Ensuring compliance with training requirements

All staff are responsible for safeguarding and must act in accordance with this policy at all times.

#### **Prevention of abuse:**

Abuse is a violation of an individual's human and civil rights by any other person or persons. The most common forms of abuse are described in the statutory guidance accompanying the Care Act 2014 as:

- Physical abuse;
- Domestic violence;
- Sexual abuse;
- Psychological abuse;
- Financial or material abuse;
- Modern slavery;
- Discriminatory abuse;
- Organisational abuse;
- Neglect and acts of omission;
- Self-neglect

The organisation will ensure that Service Users are safeguarded from abuse in all these forms. This duty to safeguard adults applies to Service Users who:

- Have needs for care and support;
- Are experiencing, or at risk of, abuse or neglect, and;
- As a result of those care and support needs are unable to protect themselves from either the risk of, or the experience of abuse or neglect.

The following six principles as set out in guidance to the Care Act 2014 should inform practice with Service Users. These are as follows:

- **Empowerment** – People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** – It is better to take action before harm occurs.
- **Proportionality** – The least intrusive response appropriate to the risk presented.
- **Protection** – Support and representation for those in greatest need.
- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** – Accountability and transparency in delivering safeguarding.

Workers should also be alert to less obvious signs of abuse, including changes in behaviour,

fearfulness, withdrawal, or unexplained injuries.

### **Children and young people**

The legislation and guidance relevant to safeguarding and promoting the welfare of children includes the following:

- Children Act 1989 and 2004
- Working Together to Safeguard Children (2023)
- Children and Social Work Act 2017
- Children's Wellbeing and Schools Bill (2025, in progress)

### **A Brief overview**

Local authorities have overarching responsibility for safeguarding and promoting the welfare of all children and young people in their area. They have a number of statutory functions under the 1989 and 2004 Children Acts which make this clear, and this guidance sets these out in detail. This includes specific duties in relation to children in need and children suffering, or likely to suffer, significant harm, regardless of where they are found, under sections 17 and 47 of the Children Act 1989. The Director of Children's Services and Lead Member for Children's Services in local authorities are the key points of professional and political accountability, with responsibility for the effective delivery of these functions. Whilst local authorities play a lead role, safeguarding children and protecting them from harm is everyone's responsibility. Everyone who comes into contact with children and families has a role to play. This includes agency workers supplied by OneCall24, who must act in accordance with local safeguarding procedures at all times. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Local agencies, including the police and health services, also have a duty under section 11 of the Children Act 2004 to ensure that they consider the need to safeguard and promote the welfare of children when carrying out their functions. Under section 10 of the same Act, a similar range of agencies are required to cooperate with local authorities to promote the well-being of children in each local authority area (see chapter 1). This cooperation should exist and be effective at all levels of the organisation, from strategic level through to operational delivery. Professionals working in agencies with these duties are responsible for ensuring that they fulfil their role and responsibilities in a manner consistent with the statutory duties of their employer.

### **Recent and Emerging Developments (For Awareness)**

In addition to the above, safeguarding responsibilities have been further strengthened through more recent legislation and statutory guidance:

- **Working Together to Safeguard Children (2023)** – This updated statutory guidance reinforces the importance of multi-agency working, a child-centred approach, and clear accountability across all safeguarding partners.
- **Children and Social Work Act 2017** – Introduced new local safeguarding arrangements, replacing Local Safeguarding Children Boards (LSCBs) with Safeguarding Partners (local authorities, police, and health services), and established the Child Safeguarding Practice Review Panel.
- **Children’s Wellbeing and Schools Bill (2025, pending)** – Aims to improve tracking of children missing from education, introduce a unique identifying number for every child, and strengthen local authority powers to intervene where children may be at risk (not yet enacted into law at the time of this policy)
- **Crime and Policing Bill (2025, pending)** – Proposes the introduction of mandatory reporting duties for professionals who suspect abuse or neglect, further reinforcing the shared responsibility to protect children (not yet enacted into law at the time of this policy)

### **Vulnerable Adults**

Safeguarding adults at risk of harm or abuse is a statutory responsibility underpinned by key legislation and guidance. The primary legal frameworks include:

- **Care Act 2014** – Establishes the legal duty for local authorities to safeguard adults with care and support needs who are at risk of abuse or neglect and unable to protect themselves.
- **Care and Support Statutory Guidance (Chapter 14 – Safeguarding)** – Provides detailed guidance on implementing the Care Act’s safeguarding duties.
- **Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012)** – Strengthens the role of the Disclosure and Barring Service (DBS) and clarifies information-sharing duties between police and safeguarding bodies

Safeguarding concerns involving adults must be reported in line with local authority safeguarding procedures and the Care Act 2014.

### **Six Key Principles of Adult Safeguarding**

Although not legal duties, the following principles are embedded in best practice and statutory guidance:

1. **Empowerment** – Supporting individuals to make their own decisions and give informed consent.
2. **Protection** – Providing support and representation for those in greatest need.
3. **Prevention** – Taking action before harm occurs.
4. **Proportionality** – Responding in the least intrusive way appropriate to the risk.
5. **Partnership** – Working collaboratively with local communities and services to prevent and detect abuse.
6. **Accountability** – Ensuring transparency in safeguarding practices and decision-making.

**OneCall24 confirms full compliance with the Safeguarding Vulnerable Groups Act 2006 (as amended). This includes:**

- OneCall24 shall comply with all requirements placed upon it by the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012)
- OneCall24 warrants that, at all times, it has no reason to believe—and will not have reason to believe—that any member of Staff is barred from engaging in regulated activity under the Safeguarding Vulnerable Groups Act 2006.
- OneCall24 shall ensure that no person is employed or otherwise engaged in the provision of the Services if that person:
  - is barred from carrying out regulated activities as defined by the Act; or
  - has a history of conduct or criminal records that indicate they may not be suitable to carry out such activities or may present a risk to patients, service users, or any other person.
- OneCall24 will ensure that the Contracting Authority is kept informed at all times of any member of Staff who, after commencing employment:
  - receives a conviction or caution relevant to safeguarding;
  - has previous convictions or conduct brought to light that indicate unsuitability for regulated activity;
  - or otherwise presents a safeguarding concern.

In such cases, OneCall24 shall only continue to engage or employ the individual with the written consent of the Contracting Authority and subject to any safeguards the Contracting Authority may reasonably require. If consent is withheld, OneCall24 shall remove the individual from the provision of Services immediately.

- OneCall24 shall promptly provide the Contracting Authority with any information it reasonably requests to enable it to verify compliance with safeguarding obligations.
- OneCall24 acknowledges that the Contracting Authority may, at any time, request the removal and replacement of any member of Staff from the provision of Services. The Contracting Authority will act reasonably in making such requests and, where appropriate, will first raise concerns with OneCall24 to seek a mutually agreeable resolution. However, where there are immediate concerns regarding the safety of patients or service users, the Contracting Authority reserves the right to act without prior discussion.

OneCall24 will make referrals to the Disclosure and Barring Service (DBS) where required by law.

### **Information Sharing and Confidentiality**

Information will be shared on a need-to-know basis in order to safeguard individuals.

Where there is a risk of harm, information may be shared without consent in line with safeguarding legislation.

All information will be handled in accordance with data protection requirements.

### **Learning from the Jimmy Savile NHS Investigations**

OneCall24 recognises the findings of the NHS investigations into the activities of Jimmy Savile and the importance of strengthening safeguarding practices across healthcare settings.

The organisation acknowledges all 14 recommendations from these investigations and confirms that these have been considered and embedded within its policies and procedures.

In particular, OneCall24 ensures:

- Robust recruitment, vetting, and DBS checking processes for all staff and workers
- Appropriate supervision and oversight of agency workers and volunteers
- Regular safeguarding training and refresher training in line with national guidance
- Clear accountability and governance structures for safeguarding
- Effective reporting and escalation procedures, including referrals to the Local Authority Designated Officer (LADO) and Disclosure and Barring Service (DBS)
- Consistent standards between agency and substantive staff
- Ongoing monitoring, audit, and review of safeguarding arrangements
- Appropriate management of access to service users, environments, and systems, including digital and social media where relevant

OneCall24 also ensures that its recruitment and compliance processes align with NHS Employment Check Standards and that all workers are subject to appropriate checks based on their role and level of contact with vulnerable individuals.

This approach ensures that the learning from historical safeguarding failures is actively applied to prevent harm and protect service users.

All information is readily available to all employees and agency workers at all times.

### **Review**

This policy statement will be reviewed annually as part of our commitment to upholding professional standards. It may be altered from time to time in the light of legislative changes, operational procedures or other prevailing circumstances.