

UHI | INVERNESS

PROTECTING VULNERABLE GROUPS (PVG) SCHEME FOR EXTERNAL STAKEHOLDERS AND SUPPORT STAFF PROCEDURE

PR/HR/2025/004

Lead Officer	Vice Principal – Student Experience & Quality
Review Officer	HR Manager
Date first approved by EMT	June 2021
First Review Date	June 2024
Date review approved by EMT	
Next Review Date	Under review, to be completed by 1 Feb 2026
Equality impact assessment	March 2021
Further information (where relevant)	N/A

Reviewer	Date	Review Action/Impact
Vice Principal – Student Experience & Quality	June 2021	New procedure created and approved by EMT.

Name:	Protecting Vulnerable Groups (PVG) Scheme for External Stakeholders and Support Staff
Purpose:	To provide standards and guidance around the expectations regarding PVG for external support agencies and individuals supporting learners in college. To provide an overview of the processing and secure handling, use, storage and retention of PVG Scheme information
Users:	All staff but particularly: <ul style="list-style-type: none">- Support Education team- Wellbeing and Learning Support team- HR team- Data Controller All external stakeholders working with the College learners and providing support to individual learners on site and remotely.

1. Introduction

- 1.1. In addition to the policy on [Secure Handling, Use, Storage and Retention of Disclosure Information](#) the following procedure outlines the expectations regarding PVG for external support agencies and individuals supporting learners in college.
- 1.2. This procedure is intended to also provide an overview of the processing and Secure Handling, Use, Storage and Retention of PVG Scheme Information
- 1.3. The key principles for checking new and existing staff are in accordance with the [PVG Scheme for New & Existing Staff Procedure](#).

2. Key Principles

- 2.1. The prime concern at all times must be the safety and interests of all children and protected adults who are attending the College.
- 2.2. All staff have a role to play in protecting learners from harm. In addition, all external stakeholders who are working to support learners, either on site or remotely, have a role to play in protecting learners from harm.
- 2.3. The specific needs of people with disabilities, and those from the under 18 age group, might make them especially vulnerable to abuse. The profile of College learners encompasses vulnerable adults and school pupils and as such there are robust arrangements in place for protecting and safeguarding individuals.
- 2.4. Reasonable steps will be taken to prevent foreseeable harm to children and to protected adults.

- 2.5. External stakeholders have a professional responsibility to provide the College with any updates on a continuous basis. Individuals supporting learners, but not directly employed by the College, will be provided with a guide to [Best Practice in Supporting Learners \(Appendix 5\)](#). This is to support the safeguarding of learners but also in order that they can be fully informed and protect themselves from wrongful allegations. The [PVG Scheme for New and Existing Staff Procedure](#) for College staff will also be provided by means of guidance and support to all those working in the College.
- 2.6. It is a pre-requisite that the college will hold a data sharing agreement with individual external agencies for whom external staff are employed by. A data sharing agreement is not required with self-employed individuals, for whom the college will act as the employing organisation for the sole purpose of the PVG.

3. New Staff Supporting Learners – see [Appendix 1](#)

- 3.1. The College asks for all staff, including those not directly employed by the College, to be in receipt of a dual PVG encompassing both children and protected adults. Individuals who are only in receipt of one part of the PVG e.g. either child OR protected adult, will be asked to apply to Disclosure Scotland for the additional part.
- 3.2. In exceptional circumstances, the Depute/Head of School will liaise with the local manager of the employing organisation to discuss whether an individual can begin supporting a student without the dual PVG being in place. In such instances a Disclosure Scotland Disclaimer form will be required which enables the college to risk assess the individual as being suitable to commence support prior to the final check being completed by Disclosure Scotland. The HR Manager will complete the sign off prior to an individual being permitted to carry out work with students. This follows the same process as for college employed staff. See [Appendix 2](#).
- 3.3. The college will also require any external staff who are employed directly by a student or by a parent/carer on their behalf, and not by a third-party agency, to hold a dual PVG. In such circumstances the same process will be applied with regards to the Disclosure Scotland Disclaimer form, as detailed above.
- 3.4. The college will act as the employing organisation for external staff who are directly employed by a student or by a parent/carer and for the sole purpose of the PVG. In such circumstances the college will receive any updates directly. The cost of any PVG will be the responsibility of the individual or the agency who is employing them.
- 3.5. The exception to the above arrangements will be for individuals employed directly by a student using the Disabled Students Allowance (DSA). In line with the [Student Awards Agency Scotland guidelines](#) on DSA, the primary responsibility around the suitability of a support worker will lie with the student (as the employer) or with the external agency they choose to go

through to employ an individual. The [Student Awards Agency Scotland \(SAAS\) guidelines](#) provide useful information to students in how to employ non-medical personal help (NMPH) and how to ascertain the suitability of an individual for support purposes.

- 3.6. If the DSA is used to employ support which is provided *off-campus*, then the responsibility for checking the suitability of support will lie solely with the student. The college's Education Support Advisers can provide advice and guidance to those in receipt of DSA to help them appoint suitable support.
 - 3.7. If the DSA is used to employ support which is provided *on campus* and in classes, then the college will require the external support staff member to be in receipt of the dual PVG, in the same way as any external support worker who is supporting students on site. The college's role and how the college handle the PVG for individuals will be determined by whether they are employed by an external agency or if they are self-employed – see [Appendix 1](#).
 - 3.8. All external support workers will also undertake an induction prior to commencing work with the College. This will encompass useful information around health and safety and working practices. Materials will be provided to take away.
 - 3.9. The College has the right to refuse to accept an individual to support a learner in all instances, including when the dual PVG is not in place. The cost of adding an additional part to the PVG will always be the responsibility of the individual and or their employer.
 - 3.10. Individuals approved to work with learners will be issued with a College external support workers lanyard to be worn at all times on site in addition to their own organisation's ID.
- 4. Record Keeping and Ongoing Monitoring – see [Appendix 3](#)**
- 4.1. Data sharing agreements (see 2.6) are updated annually and outline the information that the College gathers and how that is processed.
 - 4.2. The College will collect the following information on a bi-annual basis from employers:
 - Employer name and address
 - Employee name
 - Name of student being supported by employee
 - Employee PVG number
 - Date of PVG issue
 - Confirmation by the employer that their employee has been checked against the children and protected adult register
 - Confirmation if there is a risk assessment in place (if there is criminal history or something on the records that suggests consideration for listing)
 - 4.3. All PVG Scheme Members are subject to ongoing monitoring (continuous updating) by Disclosure Scotland. The employer has a responsibility to inform the college in the event of a PVG scheme record being updated showing an update / offence that may preclude the individual from

undertaking regulated work with children or protected adults. The employer also has a responsibility to inform the college if an individual is under consideration for listing.

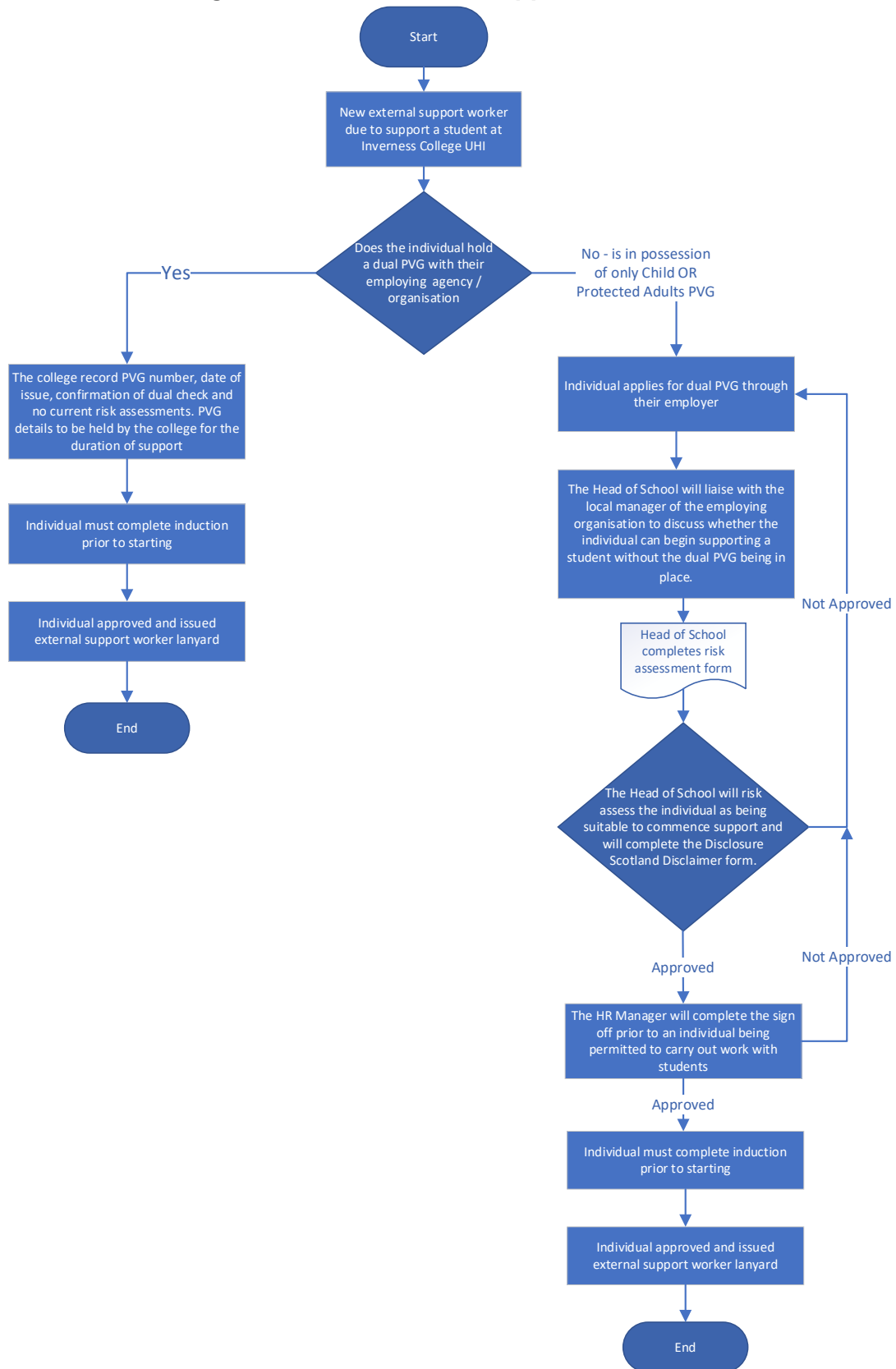
- 4.4. In all such instances, the local external manager will liaise with the Depute/Head of School for Supported Education learners and the Director of Student Experience for all other learners. The identity of the data subject will not be disclosed until such time when it is required.
- 4.5. The Director of Student Experience must be notified of any updates to PVG scheme records which may preclude an individual from undertaking regulated work.
- 4.6. A discussion will take place about the relevance of any offences detailed on the PVG and a risk assessment will be carried out where appropriate to ascertain suitability to undertake regulated work.
- 4.7. If the College has acted as the employing organisation for the purpose of the PVG then it will directly receive any updates.
- 4.8. The college would ask that external stakeholders inform the college immediately if any employee attending the College is arrested and/or if refused bail or if convicted by a court of any criminal offence. This is regardless of whether the offence relates to the protection of Children or Protected Adults.
- 4.9. To support the need for ongoing monitoring and the currency of information held, the college will liaise with all external stakeholders bi-annually to request any updates to PVGs. External agencies should use the [PVG Update Form \(Appendix 6\)](#) to advise the College of any updates in an on-going way and a minimum of twice a year.
- 4.10. Any instance of a Disclosure Scotland Disclaimer being used or a notification for listing will be recorded as part of the College safeguarding records. The College may have a professional responsibility to notify other agencies as part of our Multi-agency public protection arrangements (MAPPA).

Responsibilities:

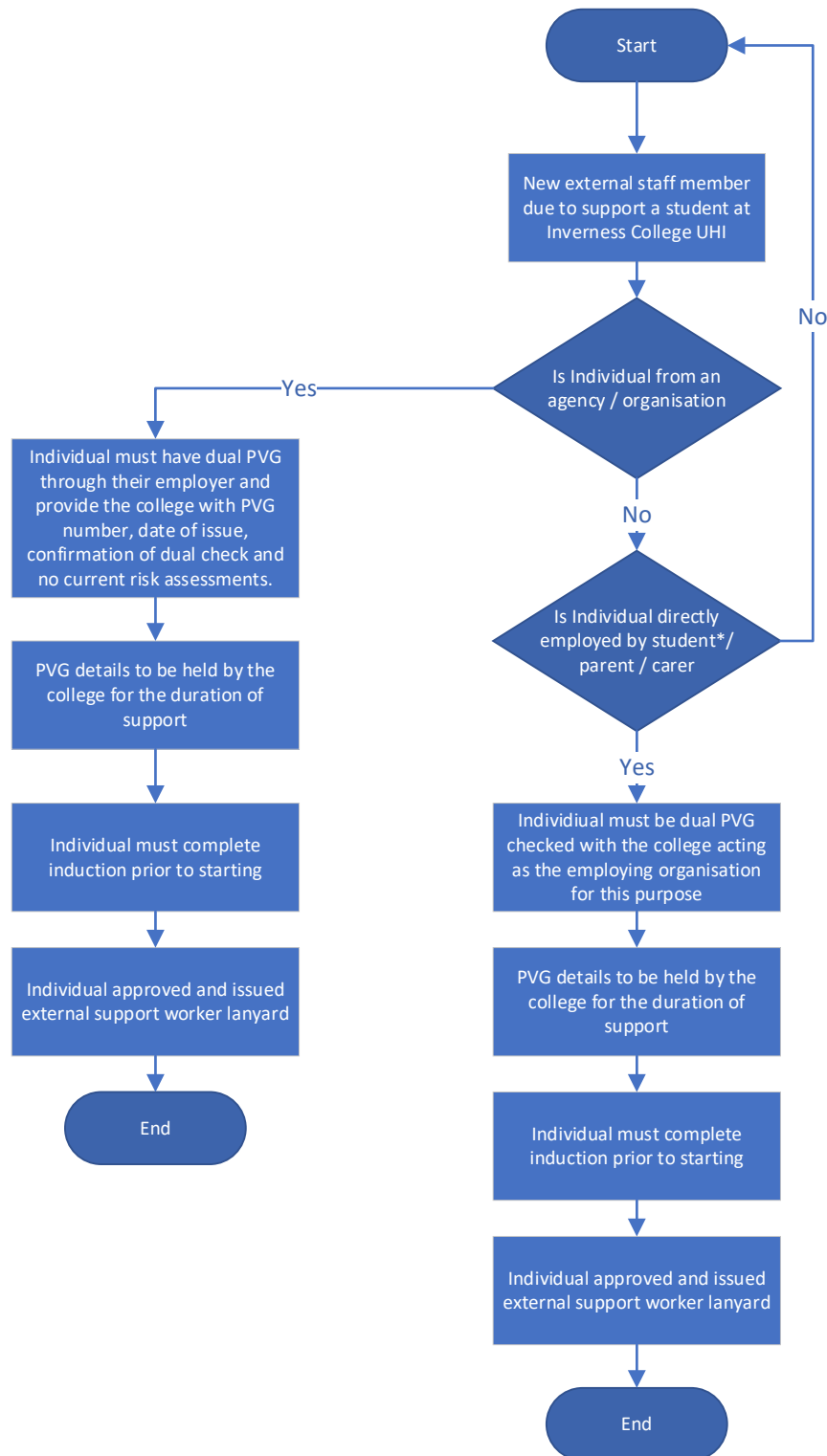
College	External Agencies	Self Employed Individual
Play an active role in protecting learners from harm and in particular prevent foreseeable harm to children and to protected adults	Play an active role in protecting learners from harm and in particular prevent foreseeable harm to children and to protected adults	Play an active role in protecting learners from harm and in particular prevent foreseeable harm to children and to protected adults
Devise a data sharing agreement with individual external agencies whom external staff are employed by	Sign off on and be aware of the nature of any data sharing agreement/s with the College	
	Disclose prior to and following appointment any criminal allegations, charges or convictions relating to any individual they employ who is working with the College	Disclose prior to and following appointment any criminal allegations, charges or convictions
Work in partnership with external employing agencies and individuals to ensure a dual PVG is in place for all external staff supporting learners on the College campus or remotely	Work in partnership with the College to ensure a dual PVG is in place for all staff supporting learners on the College campus or remotely	Work in partnership with the college to ensure that a dual PVG is in place
Complete the Disclosure Scotland Disclaimer form and risk assess any circumstances around an individual/s who do not hold the dual PVG	Support the College in providing any relevant information to assist with any risk assessments required	
Prompt external agencies bi-annually to confirm the currency of staff and to provide any updates to PVG for those staff engaged in work at the College Pay cognisance to any updates made to PVGs and risk assess accordingly.	Provide on-going PVG updates to the College and a minimum of twice a year as requested through the PVG Update form	

Act as employing organisation for the sole purpose of the PVG for those who are self-employed and working with the college to support students		Apply for the dual PVG scheme with the College providing support with the process where required
Provide external staff with the materials around <i>Best Practice in Supporting Learners</i> and any other induction materials to ensure individuals safeguard learners whilst protecting themselves from wrongful allegations	Be familiar with the <i>Best Practice in Supporting Learners</i> and any other induction materials to ensure individuals safeguard learners whilst protecting themselves from wrongful allegations	Be familiar with the <i>Best Practice in Supporting Learners</i> and any other induction materials to ensure individuals safeguard learners whilst protecting themselves from wrongful allegations.
Issue External Support Worker lanyard when approval has been confirmed	Display external support worker lanyard when on campus	Display external support worker lanyard when on campus
Consider notifying other agencies as part of Multi-agency public protection arrangements (MAPPA) of any concerns, intelligence, or consideration for listing		

Appendix 1 – Handling PVG for New External Support Workers

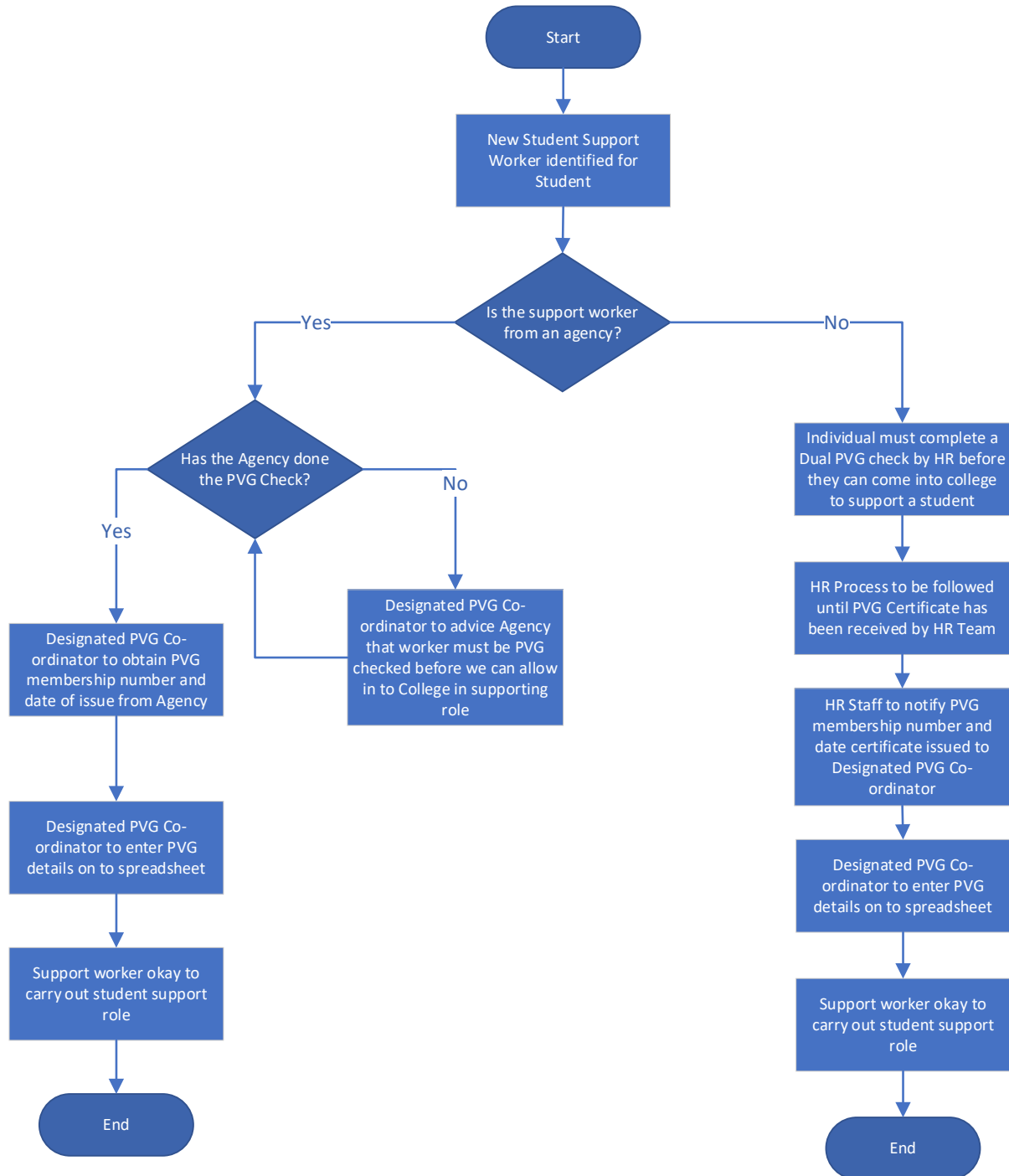


Appendix 2 – Direct Employment by Student/Carer

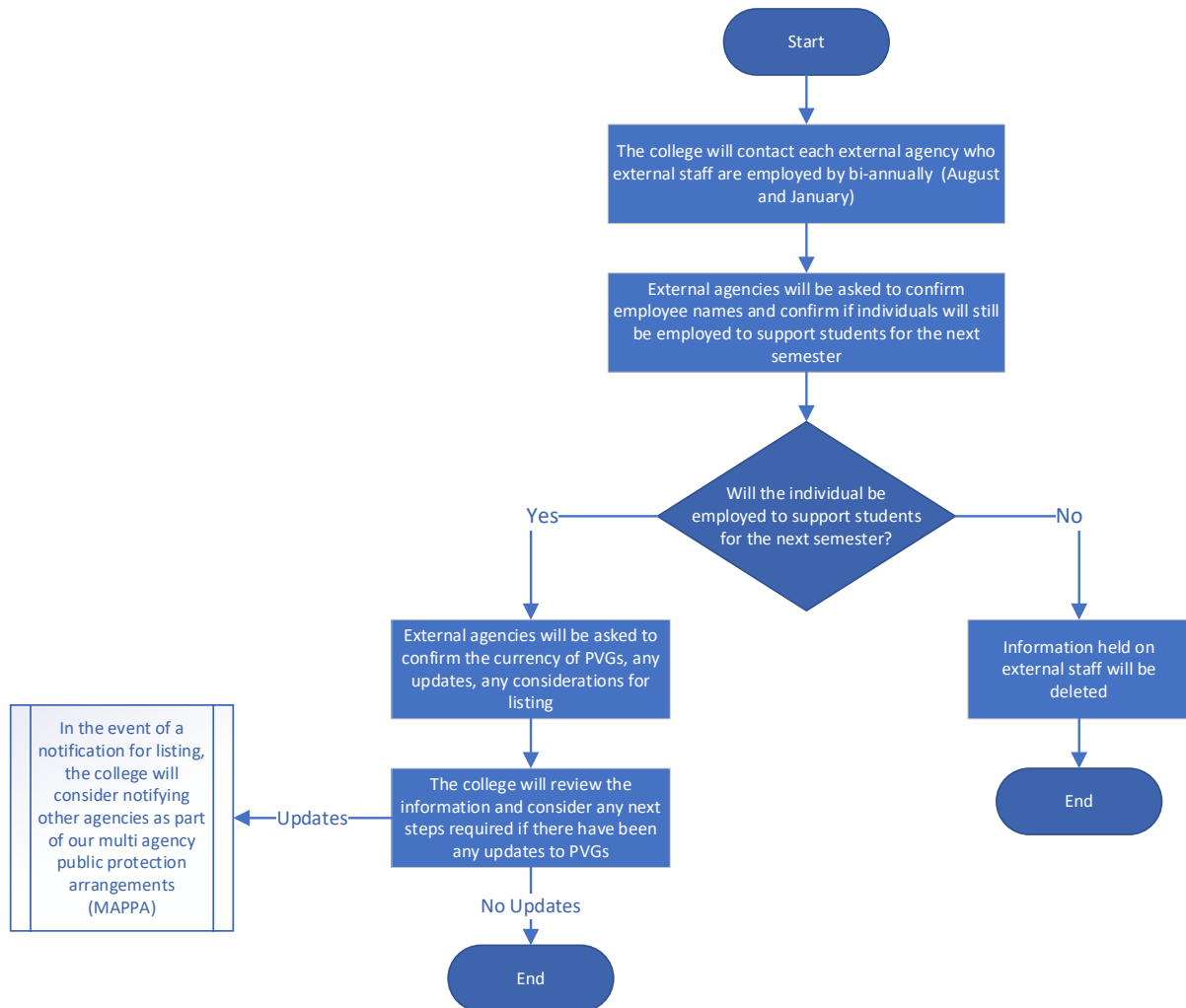


*Students using the Disabled Students Allowance (DSA) to employ their own support worker directly or through an agency will fall out with this procedure and will be responsible for checking on suitability for support

Appendix 3 – Agency External Support Workers



Appendix 4 – Keeping Information Current



Appendix 5 - Best Practice in Supporting Learners

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Welcome to Inverness College UHI.

We hope that you enjoy working with us to provide the best possible experience for the people we work with.

The Lecturer oversees the classroom and has a specific legal responsibility for the health, safety, and wellbeing of students whilst they are in class however, it is our aim to have fun and work as a team.

Whilst the classroom is a formal learning environment it is also an excellent place to model professionalism and respect, and to develop positive working relationships within professional boundaries.

Please –

- Arrive on time and do not leave before class/activity ends unless agreed with the lecturer. (Arriving late and/or leaving early can disrupt the environment for everyone.)
- Provide discreet support and unobtrusively prompt students to listen to the lecturer.
- Actively support the student to engage in activities and repeat instruction or ask for further clarification if necessary.
- Provide reassurance and encouragement to students, whilst stepping back if the student requires less assistance thereby allowing increased independence.
- Actively support students to do their work to the best of their ability i.e. hand-over-hand for writing.
- Communicate any concerns in a discreet and professional manner.
- **Uphold the Codes of Practice set out by the Scottish Social Services Council.**

Appendix 6 – PVG Update Form

DATE

Dear ORGANISATION,

In line with our Policies on Safeguarding and Secure Handling, Use, Storage and Retention of PVG Information, we require you to confirm the following information;

Approved staff names – information already held on file by IC UHI (PVG number, date issued, checked against children and adult register, any risk assessment in place)	Currently employed by <i>and</i> providing ongoing support to attend IC UHI YES/NO	IC UHI to retain the information held for a further 6 months YES/NO

Have any of the above-mentioned staff members had any considerations for listing added to their PVG Scheme Record? YES/NO

In the event a PVG Scheme Record is returned with any updates showing an offence that may preclude the individual from undertaking regulated work with children or protected adults, or identify that the individual is being considered for listing, the **ORGANISATION will undertake a risk assessment** and make Inverness College aware of this.

The local manager will liaise with the college's Head of School to discuss the relevance of the offence, without divulging the name of the data subject. Inverness College UHI reserve the right to object to the suitability for employment of any support worker based on the relevance of any offence previously committed.

Please note, that if we are advised to remove PVG Scheme information currently held by IC UHI then should that staff member be required to return to college to support an individual, we will need to be provided with the up-to-date PVG Scheme information before they will be approved and a short induction will be held.