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**Practice Guidance:**

**Person in a Position of Trust**

A framework and process for responding to allegations and concerns against people working with adults with care and support needs.

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# 1. Introduction / Scope of this Guidance

For the purposes of this guidance:

* An employee, student or volunteer who works with adults with care and support needs as part of their employment, studies or voluntary work, can be considered to be in a ‘position of trust’

and

* Where the role carries an expectation of trust and the person is in a position to exercise authority, power or control over an adult(s) at risk (as perceived by the adult at risk).

Positions of trust may include, but are not limited to any staff (paid or voluntary) working on behalf of:

* Social care
* Health services
* Police and criminal justice
* Housing
* Education

This document should be read in conjunction with the Joint Multi-Agency Safeguarding Adults Policy and Procedures (West Yorkshire, North Yorkshire and City of York).

The Person in a Position of Trust (PiPoT) referral form is available here: <https://www.saferbradford.co.uk/media/gnsdqrez/pipot-referral-form.doc>

This document is based on the North Yorkshire Safeguarding Adults Board Policy for Managing Concerns around a Person in a Position of Trust.

This policy builds upon existing relevant statutory provisions for sharing information and responding to safeguarding concerns. The guidance for ‘Managing allegations against people in a position of Trust’ is contained within section 14 of the Care and Support Statutory Guidance. The Care Act Statutory guidance states that Safeguarding Adults Boards need to establish and agree a framework and process for how allegations against people working with adults with care and support needs (for example those in positions of trust) should be notified and responded to. Other relevant legislation includes Data Protection Act 2018, Human Rights Act 1998 and employment legislation.

The purpose of this guidance is to provide a framework for managing cases where allegations have been made against a Person in a Position of Trust (PiPoT) and is focused on the management of risk based on an assessment of abuse or harm against an adult with care and support needs. It provides a framework to ensure appropriate actions are taken to manage allegations regardless of whether they are made in connection with the PIPOT’s employment, in their private life or any other capacity.

The six safeguarding principles within the Care Act 2014 should inform this area of work:

**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 safeguarding practice.

This policy gives guidance in relation to information sharing; employer responsibilities; risk assessments and employee rights. It provides an overview of the Data Protection Act 2018, European General Data Protection Regulation 2018 (GDPR) and Human Rights Act 1998, which must be taken into account within this process.

# 2. Criteria for a referral of a Person in a Position of Trust

2.1 A Person in a Position of Trust allegation relates to a person who works with adults with care and support needs who, in their personal life or within their employment, volunteering role or studies has:

* behaved in a way that has harmed, or may have harmed an adult or child
* possibly committed a criminal offence against, or related to, an adult or child
* behaved towards an adult or child in a way that indicates they may pose a risk of harm to adults with care and support needs that they work with. (Care and Support Statutory Guidance, Section 14.123)

**Examples below demonstrate incidents which may indicate that a risk may be posed by a person in a position of trust: please note that this is not an exhaustive list**:

* Police attend a domestic abuse incident and it comes to light that the perpetrator works with adults with care and support needs or children. For example, as a carer in a care home, carer for a homecare agency or a district nurse etc.
* A social worker has initiated contact with a service user over social media for work related reasons or to form a personal relationship.
* The Office of Public Guardian has removed a Lasting Power of Attorney for an Adult at Risk due to financial abuse. The previous LPA is a manager of a care provider who oversees service user’s day to day finances.

Wherever it has occurred however, there is now a potential risk to adults with care and support needs.

# 3. What is excluded from this policy?

3.1 If an allegation is made that concerns the actions of a professional, or volunteer which relates to alleged abuse or neglect of a person with care and support needs, then such an allegation should be responded to, by following the Joint Multi-Agency Safeguarding Adults Policy and Procedures (West Yorkshire, North Yorkshire and City of York, 2021). This procedure includes directions about how concerns are referred and responded to.

Other relevant bodies and their procedures, where appropriate, should also be used to recognise, respond to and resolve these issues, for example, Nursing and Midwifery Council (NMC), General Medical Council (GMC), Social Work England (SWE) etc.

# 4. Responsibilities

**Bradford Safeguarding Adults Board**

The Bradford Safeguarding Adults Board (BSAB) is responsible for establishing, maintaining and reviewing the framework for how concerns and allegations against people working with adults with care and support needs should be notified and responded to (i.e. those in positions of trust).

Each partner agency, in their annual self-assessment audit to the BSAB, will be required to provide assurance that arrangements to deal with allegations against a Person in a Position of Trust, within their organisation are adequate and are functioning effectively. The BSAB will maintain oversight of whether these arrangements are considered to be working effectively between, and across partner agencies in Bradford District. Appropriate cross-organisational challenge should be possible as it is an important part of this process.

**Employers (student bodies and voluntary organisations)**

In accordance with the Joint Multi-Agency Safeguarding Adults Policy and Procedures, employers (student bodies and voluntary organisations), should have clear and accessible policies and procedures, in place setting out the Person in a Position of Trust process. These should determine who undertakes an investigation, include timescales for the investigation and include how support and advice will be made available to individuals against whom allegations have been made in accordance with employment law.. Any allegations against people, who work with adults, should be reported immediately to a senior manager within the organisation, and reported to the Local Authority Safeguarding Adults Service where required. If employers are unsure if the concern needs to be reported advice can be sought from the Local Authority Safeguarding Adults Service ([safeguarding.adults@bradford.gov.uk](mailto:safeguarding.adults@bradford.gov.uk), 01274 431077). Employers, student bodies and voluntary organisations should have their own source of advice (including legal advice) in place for dealing with such concerns.

4.4 Where such concerns are raised about someone who works with adults with care and support needs, it will be necessary for the employer or student body or voluntary organisation to assess any potential risk to adults with care and support needs who use their services, and to act to safeguard those adults.

# 5. Children

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5.1 Where there are concerns about a person who works with children the LADO should be contacted for advice within one working day. Email should be sent requesting a call to LADO@bradford.gov.uk or ring 01274 435600 within working hours (8.30am to 5pm Mon – Thurs and 4.30pm on Friday).

5.2 Where concerns have been identified about a person’s practice and they are a parent/carer for children, then consideration should be given to whether a referral to Children’s Services is required.

# 6. Information Sharing

Fears of sharing information must not stand in the way of promoting and protecting the well-being of adults at risk of abuse and neglect’ (Care Act 2014 14.14). The act also highlights the importance of early sharing of information as the key to providing effective help where there are emerging concerns. Information sharing should comply with the Caldicott principles and must be justifiable, proportionate and based on potential or actual harm to adults or children at risk. The rationale for decision-making about information sharing should always be recorded. Please also refer to the Care and Support Statutory Guidance, Chapter 14.

When sharing information about adults, children and young people at risk between agencies it should only be shared:

* Where there is a legal justification for doing so
* where relevant and necessary, not simply all the information held
* with the relevant people who need all or some of the information
* when there is a specific need for the information to be shared at that time.

If an organisation is in receipt of information, that gives cause for concern about a Person in a Position of Trust, then that organisation should give careful consideration as to whether they should share the information with the person’s employers, (or student body or voluntary organisation), to enable them to conduct an effective risk assessment. Any organisation that receives this data will be a Data Controller as defined by the [Data Protection Act](http://www.legislation.gov.uk/ukpga/1998/29/contents) [2018](http://www.legislation.gov.uk/ukpga/1998/29/contents) and [GDPR Article 4](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/) (please refer to Section 4.0 Legal Framework).

Partner agencies and service providers, are individually responsible for ensuring that information relating to Person in a Position of Trust concerns, are shared and escalated outside of their organisation in circumstances where this is required. Such sharing of information must be lawful, proportionate, justified and necessary. As a Data Controller, it is the recipient organisation’s responsibility for making a judgement as to whether it is appropriate to share the concerns with the Local Authority Safeguarding Adults Service, who will then decide whether it is necessary to share with the employer or forward to West Yorkshire Integrated Care Board – Bradford District and Craven Designated Safeguarding Team or Police leads.

Following an investigation if a Person in a Position of Trust is removed, by either dismissal or permanent redeployment, to a non-regulated activity, because they pose a risk of harm to adults with care and support needs, (or would have, had the person not left first), then the employer (or student body or voluntary organisation), has a legal duty to refer the person to the Disclosure and Barring Service (DBS). ***It is an offence to fail to make a referral without good reason.*** In addition, where appropriate, employers should report workers to the statutory and other bodies responsible for professional regulation, such as, Social Work England, General Medical Council and the Nursing and Midwifery Council.

If a person subject to a Person in a Position of Trust investigation attempts to leave employment by resigning with immediate effect in an effort to avoid the investigation or disciplinary process, the employer (or student body or voluntary organisation), irrespective of the resignation, must conclude whatever process has been instigated with the evidence before them. If the investigation outcome warrants it, the employer can dismiss the employee or volunteer instead and make a referral to the DBS. The employer would need to consult with their human resources department and DBS. This would also be the case where the person intends to take up legitimate employment or a course of study.

# 7. Support for the ‘person in a position of trust’

7.1 Where concerns have been raised that a person in a position of trust may pose a risk to people with care and support needs, the experience is likely to be very stressful for them. Alongside the duty of care towards the adult at risk, there must be a duty of care to the employee, volunteer or student concerned.

7.2 The employer/student body will need to provide support to minimise stress associated with the process, this may need to include where possible:

* + support for the person to understand the procedures being followed
  + updates on developments
  + the opportunity to respond to allegations/concerns
  + support to raise questions or concerns about their circumstances

7.3 There may be limitations on the amount of information that can be shared at a particular time in order not to prejudice any Enquiry/investigation or place any adult or child at risk. This must be agreed following consultation with the local authority Adult Safeguarding Service Manager.

7.4 There may also be occasions where there is a need to agree changes to the Person’s working arrangements or to the support provided; any changes should be reported to the local authority Adult Safeguarding Service Manager.

7.5 If the Person is a member of a union or professional association or network s/he should be advised that they may wish to seek support from that organisation. The Person may also wish to seek independent advice regarding employment issues. Such advice and support should be supplementary to that provided by the employer.

# 8. Making a Person in a Position of Trust Referral

8.1 Where a relevant agency is alerted to information that may affect the suitability of a professional, or volunteer to work with an adult(s) at risk, a referral should be made to the Bradford Safeguarding Adults Team, using the Person in a Position of Trust Referral Form which is available from Safer Bradford Website at: <https://www.saferbradford.co.uk/media/gnsdqrez/pipot-referral-form.doc>

# 9. Person in a Position of Trust Enquiries

9.1 As part of the enquiry, the LA Safeguarding Adults Service may convene a planning meeting to assess and determine the actions required to manage the risk posed by a Person in a Position of Trust. The purpose of the meeting is to undertake a collaborative assessment of the level of risk posed by the person about whom concerns have been raised and to clarify what information should be shared with the employer if they are not already aware, and decide on which organisation holds the responsibility to share the information.

9.2 A planning meeting may need to include the Care Quality Commission, commissioning, contracts, police and other relevant parties, where appropriate, to address the concern.

9.3 In circumstances where the concerns have arisen from the person’s personal or private life, or in anther work setting, the decision to share information with an employer/student/volunteer body must be justifiable and proportionate, based on the potential or actual harm to adults at risk. The rationale for decision-making should be recorded clearly in line with organisational recording procedures.

9.4 Decisions about sharing information should consider the key question of whether the person has behaved or may have behaved, in a way that questions their suitability to undertake their current role or to support adults with care and support needs.

9.5 The following factors should be considered, but are not exhaustive:

* Nature and seriousness of the actions/behaviour
* The context within which the actions/behaviour occurred
* Frequency or patterns of actions/behaviour
* Nature of the person’s access/role with adults with care and support needs
* The potential impact on an adult with care and support needs

9.6 Consideration should be given to informing the Person in a Position of Trust about the allegation against them unless to do so, puts the adult or child in danger or at further risk. The Person in a Position of Trust should be made aware that the allegation will be shared with their employer/student body, and should be offered a right to reply. A decision will be made by the LA SGT on who will need to share this information.

9.7 In the first instance the Person in a Position of Trust should be given the opportunity to inform their employer or student body or voluntary organisation) themselves, within mutually agreed timescales. Consideration should be given whether the right to reply causes significant delays in informing the employer(or student body or voluntary organisation) resulting in risk remaining. The LA Safeguarding Adults Service will need to be assured that appropriate information has been shared with the employer (or student body or voluntary organisation) to enable them to assess risk, and review the suitability of the person working with adults with care and support needs, and any other actions required.

9.7 Wherever possible, the Person in a Position of Trust’s consent to share information with their employer (or student body or voluntary organisation) should be sought, advising what information will be shared, how it will be shared and who with. Each case must be assessed individually as there may be rare cases where informing the person about details of the allegation may increase the risks to a child or adult at risk.

9.8 Any information shared should be limited to that which is proportionate to the risk posed by the Person in a Position of Trust. It should be made very clear whether the information relates to a criminal or civil matter.

**Notification to other parties**

9.9 If the Person in a Position of Trust is registered with a professional body and there are concerns about their fitness to practice, the employer/volunteer manager must refer to the professional body’s published guidance and consider the need to raise the concern with that professional body. A professional body has a range of options where appropriate, these usually include suspending the person from practice, de-registering them or imposing conditions of practice that the person must work under.

9.9.1 The principal organisations within health and social care are:

* Social Work England (<https://www.socialworkengland.org.uk>)
* Care Quality Commission (https://www.cqc.org.uk/)
* Nursing and Midwifery Council ([www.nmc-uk.org](http://www.nmc-uk.org))
* Health and Care Professions Council ([www.hpc-uk.org](http://www.hpc-uk.org))
* General Medical Council ([www.gmc-uk.org](http://www.gmc-uk.org))
* General Optical Society ([www.optical.org](http://www.optical.org))
* General Dental Society ([www.gdc-uk.org](http://www.gdc-uk.org))
* General Chiropractic Council ([www.gcc-uk.org](http://www.gcc-uk.org))
* Royal Pharmaceutical Society of Great Britain ([www.rpsgb.org.uk](http://www.rpsgb.org.uk))
* General Osteopathic Council ([www.osteopathy.org.uk](http://www.osteopathy.org.uk))

Maintains a public register of qualified workers

* Sets standards for conduct, performance and ethics
* Considers allegations of misconduct, lack of competence or fitness to practice
* Makes decisions as to whether a registered worker can practice.

9.9.2 Notifying the professional body is the responsibility of the employer or voluntary organisation. Where a notification is made the employer should provide confirmation to Bradford Local Authority Safeguarding Adults Service that the action has been completed. The Bradford Local Authority Safeguarding Adults Service may also make such referrals where the relevant criteria has been met, and should do so where it is necessary to ensure an appropriate referral has been made.

# 10. Timescales

10.1 This policy applies whether the allegation or incident is current or historical.

# 11. Legal Framework

**The General Data Protection Regulation (GDPR) and Data Protection Act 2018.**

11.1 The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 introduce new elements to the data protection regime, superseding the Data Protection Act 1998.

11.2 Information relevant to adult safeguarding will often be data that the Act categorises as “special category personal data”, meaning it is sensitive and personal. Wherever possible, individuals and agencies should seek consent to share information, and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. If consent is not given or cannot be gained, the GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping adults with care and support needs safe. Further information can be found in appendix 2

**Human Rights Act 1998**

11.3 The [Human Rights Act 1998](http://www.legislation.gov.uk/ukpga/1998/42/contents) – The principles set out in the Human Rights Act must also be taken into account within this framework in particular the following:

* **Article 6 – The right to a fair trial**

This applies to both criminal and civil proceeding with regard to the former, the person is presumed innocent until proven guilty according to the law, and has certain guaranteed rights to defend themselves.

* **Article 7 – No Punishment without law**Article 7 provides protection against arbitrary prosecution, conviction and punishment. A person who claims that a public authority has acted or proposes to act in a way, which is unlawful by section 6(1) may a), bring proceedings against the local authority under this act in the appropriate court or tribunal or b) rely on the convention rights or rights concerned in any legal proceedings.
* **Article 8 – The right to respect for private and family life**Article 8 gives everyone the right to respect for his private and family life and his correspondence

# 12. Record Keeping

12.1 Recording of discussions, decisions and disclosures are essential and each organisation must ensure that it has a process for recording this information in accordance with their own policies and any legal requirements.

# 13. Learning Lessons

13.1 At the conclusion of a case the LA Safeguarding Service may discuss with the employer and any other appropriate partners whether there are any improvements and/or changes that could be made to prevent similar future events. Any significant concerns or identified learning will be shared with Bradford Safeguarding Adults Board.

# Appendix 1 Process Flowchart

**PiPoT criteria**

Has the person:..  
• behaved in a way that has harmed, or may have  
harmed an adult or child?  
• possibly committed a criminal offence against, or  
related to, an adult or child?  
• behaved towards an adult or child in a way that  
indicates they may pose a risk of harm to adults with  
care and support needs?

# Appendix 2: Data Protection Act and GDPR Overview

Both regulate the use of “personal data”. To understand what personal data means, we need look at how the Act defines the word “data”.

Data means information which:

1. is being processed by means of equipment operating automatically in response to instructions given for that purpose
2. is recorded with the intention that it should be processed by means of such equipment
3. is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system
4. does not fall within A, B or C above but forms part of an accessible record as defined by Section 68, or
5. is recorded information held by a public authority and does not fall within any of paragraphs a-d above.

**What is personal data?**

Personal data means data which relate to a living individual who can be identified:

1. from those data, or
2. from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller

…and involves any expression of opinion about the individual and any indication of the intentions of the Data Controller, or any other person in respect of the individual.

Sensitive personal, also known as special category data, in Article 9 of the GDPR data means personal data consisting of information that is:

1. racial or ethnic origin
2. political opinions
3. religious beliefs, philosophical beliefs or other beliefs of a similar nature.
4. Trade Union Membership
5. genetic Data
6. biometric data for uniquely identifying an individual
7. data concerning physical or mental health
8. Data concerning sex life or sexual orientation

The Data Protection Act 2018 states that data relating to the criminal activity, whether that is in relation to an offence committed or alleged to have been committed, should be treated as special category data.

The Act regulates the “processing” of personal data. Processing in relation to information or data, means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including –

1. organisation, adaptation or alteration of the information or data
2. retrieval, consultation or use of the information or data
3. disclosure of the information or data by transmission, dissemination or otherwise making available
4. alignment, combination, blocking, erasure or destruction of the information or data.

Article 5 of the GDPR lists the data protection principles:

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless:

1. at least one of the conditions in Article 6 is met, and
2. in the case of special category data, at least one of the conditions in Article 9 is also met
3. Personal data will be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
4. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed
5. Personal data shall be accurate and where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay
6. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes
7. Appropriate technical and organisational measures shall be taken again unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data

**The Seven Golden Rules to Information Sharing**

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. Be open and honest with the individual (and/or their family/representatives where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5.Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see information sharing principles above).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

# Appendix 3 Referral Form: Person in a Position of Trust

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**Referral Form:**

**Person in a Position of Trust**

**Please refer to the Practice Guidance: Person in a Position of Trust before completing this form.**

The Care Act 2014 requires Safeguarding Adults Boards to agree and establish a framework and process to respond to allegations against anyone who works (either paid or unpaid) with adults with care and support needs.

This guidance applies to the Local Authority, all partner agencies and commissioned services to enable a proportionate and appropriate response to allegations against an employee, volunteer, student etc. who works with or cares for adults with care and support needs. If a local authority is given information about such concerns they should give careful consideration to what information should be shared with the employer (or student body or voluntary organisation) to enable risk assessment. Each local authority should seek advice from their legal team about sharing information (joint multi-agency safeguarding adults policy and procedures chapter 2.23).

Information contained within this form will be used during the management and oversight of allegations against people who work with adults with care and support needs.

The information provided may be shared within the Council and other departments as appropriate, for example the Local Authority Designated Officer or Human Resources. The information may also be shared with relevant third party organisations including, police, health, voluntary agencies, independent providers of care and support and regulatory bodies such as Disclosure and Barring Service, Social Work England, General Medical Council etc.

Sharing will only be carried out where necessary and proportionate and where there is an identifiable legal basis to do so.

**Referrer’s Details:**

|  |  |
| --- | --- |
| **Date of referral** | <insert date here> |
| **Name of referrer** | <insert name here> |
| **Referrer’s position/role** | <insert details here> |
| **Referrer’s organisation/service** | <insert organisation details here> |
| **Referrer’s telephone number and email address** | <insert telephone number here>  <insert email address here> |
| **Are you happy for your details to be shared with the PiPoT** | yes/ no (please delete as appropriate) |

**Person in a Position of Trust Details:**

|  |  |
| --- | --- |
| **Name** | <insert name here> |
| **DOB** | <insert DOB here> |
| **Gender** | <insert gender here> |
| **Home address** | <insert address here> |
| **Contact details** | <insert telephone number> |
| **Employment sector( e.g Local Authority, Health, voluntary sector)** | <insert details here> |
| **Name, address and telephone number of the employer** | <insert details here> |
| **Occupation/job/title** | <insert details here> |
| **Details of where the person works/volunteers, if different to employers address** | <insert details here> |
| **Employment start date** | <insert details here> |
| **Is the PiPoT aware of the referral to Adult Social Care (if they are not aware please confirm why)** | yes/ no (please delete as appropriate)  comment: |

**Reason for Referral:**

**In your opinion what is the nature of the alleged harm? (please select all that apply)**

|  |  |
| --- | --- |
| **Conduct outside of work** |  |
| **Inappropriate behaviour in work** |  |
| **Physical abuse** |  |
| **Sexual abuse** |  |
| **Domestic abuse** |  |
| **Psychological abuse** |  |
| **Financial or material abuse** |  |
| **Neglect or acts of omission** |  |
| **Discriminatory abuse** |  |
| **Modern day slavery** |  |
| **Sexual exploitation** |  |
| **Other, please state** |  |

|  |  |
| --- | --- |
| **Full description of the allegations/concern including dates, times, witnesses etc.** | <insert details here> |
| **Does the PiPoT have any other role working with children or adults with care and support needs (if so in what capacity)** | Insert details here including name, dob, location |
| **Is the employer aware of the concerns?**  **If so, has the employer taken any actions to respond to the allegations/concern:** | yes/no (please delete as appropriate)  <insert details here> |
| **Have the police been informed?** | yes/no (please delete as appropriate)  incident/crime reference number: |
| **Has any regulatory body been informed?** | yes/no (please delete as appropriate)  <insert details here> |
| **Any other information** | <insert details here> |

**Thank you for completing this referral form. Please email the completed form to** [**safeguarding.adults@bradford.gov.uk**](mailto:safeguarding.adults@bradford.gov.uk)