**COVID-19 Emergency Recruitment - PVG Guidance**

The safety and wellbeing of vulnerable groups receiving services remains paramount and failure to carry out appropriate checks for new employees could have serious consequences. Employers must therefore continue to request PVG checks for those undertaking regulated work.

**New starts**

During the pandemic only, the council will be able to start a new staff member ahead of a PVG check without the risk of committing an offence. Barred individuals who seek to exploit this will be reported to Police Scotland.

As the council will be responsible for mitigating risk to vulnerable groups during the period pending receipt of a PVG check, a risk assessment **must** be carried out to determine the appropriate deployment of an individual. A template risk assessment is attached.

As the responsible officers, it is essential Senior Managers are satisfied with the decisions of recruiting managers and quality of risk assessments.

Offers of employment remain ‘conditional’ subject to, amongst other things, receipt of a satisfactory PVG check. Offers may therefore require to be withdrawn after a new start has commenced should an unsuitable PVG check be obtained.

A robust interview process probing previous employment and gaps in service, along with receipt of at least one suitable reference prior to appointment, are key mechanisms for minimising risk of appointing an unsuitable candidate.

Where a PVG check confirms a conviction or that an individual is barred from working with a vulnerable group, the recruiting manager **must** immediately consult their Senior Manager (or other member of the Senior management team if necessary), to agree appropriate next steps. Advice from the Senior HR Adviser may also be sought.

**Redeployment**

When redeploying an employee with no PVG to carry out regulated work, the fast track PVG checking process should be undertaken.

Employees with a PVG for one group (adults or children) may be redeployed to carry out regulated work with a different group during the pandemic.

The process for obtaining a PVG check is contained in the [Recruitment During COVID-19 Guidance](https://www.westlothian.gov.uk/media/40608/COVID-19-Recruitment-Guidance/pdf/Recruitment_During_COVID-19_Guidance.pdf?m=637214565299870000)

Further information regarding the protection of vulnerable groups can be found on the council’s intranet at: <https://www.westlothian.gov.uk/article/33233/Protection-of-Vulnerable-Groups-Children-and-Protected-Adults>

**HR Services**

**April 2020**

**PVG RISK ASSESSMENT FORM**

This form should be completed where awaiting a PVG check during the COVID-19 pandemic.

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| --- | --- | --- | --- |
| Post: |  | Appointee: |  |
| Service: |  | Recruiting  manager: |  |

|  |  |
| --- | --- |
| 1. Service area and vulnerable groups/service involved | |
|  | |
| 1. Frequency and type of contact with service users, including potential for lone working | |
|  | |
| 1. Potential risks and control measures that can be put in place to minimise risks | |
|  | |
| **Approved: Y / N** | **Approving manager signature:**  **Date:** |
| (If not approved, please outline temporary measures to be implemented pending PVG check) | |