



HEALTHBRIDGE OCCUPATIONAL HEALTH REMOTE CONSULTATION POLICY

1. PURPOSE

To ensure:

-**Safe identification** and **management** of safeguarding risks during OH assessments.

-**Compliance** with:

~GMC Confidentiality Guidance (2024)

~Care Act 2014 (adults)

~Working Together to Safeguard Children (2023)

-**Protection** of vulnerable adults/children in workplace health contexts.

2. SCOPE

Applies to all:

-Remote/in-person consultations.

-Staff handling clinical/employee data.

-Third parties processing HealthBridge referrals.

3. DEFINITIONS



Term	OH-Specific Meaning
Vulnerable Adult	Employee at risk due to disability, mental health, or coercion (e.g., modern slavery indicators).
Child at Risk	Under-18 apprentice/intern with welfare concerns (e.g., forced labour).
Imminent Risk	Disclosure of suicide plan, violence, or trafficking.

4. RISK IDENTIFICATION

During Consultations, Watch For:

-Verbal Cues:

- ~Mentions of employer coercion (e.g., "I'll lose my job if I don't sign").
- ~Disclosures of domestic violence affecting work.

-Non-Verbal Cues:

- ~Unexplained injuries visible on video.
- ~Excessive hesitation/fear discussing workplace issues.

Data Requests: Employer pressure for irrelevant health data.

5. IMMEDIATE ACTIONS



5.1 LIFE-THREATENING RISK (E.G., ACTIVE SUICIDE PLAN)

Clinician:

- Keep patient on call; notify DPO **immediately**.
- If location known, share with 999 ("Occupational health consultation in progress").

Admin:

- Call 999 → request welfare check.
- Email DPO: "SAFEGUARDING URGENT – [Name] – [Risk Details]".

Documentation:

- Verbatim notes in EHR with **redacted sections** for third-party data.

5.2 NON-URGENT RISK (E.G., FINANCIAL EXPLOITATION)

Clinician:

- Complete assessment; email DPO within **1 hour** using template:
- Subject*: "Safeguarding Concern – [Employee Name] – [Risk Type]"

DPO:

- Decide on employer notification (with/without consent per GMC para 26).

6. REPORTING & ESCALATION

Risk Level	Internal Report	External Report
Urgent	DPO + Clinical Lead (30 mins)	999 + local authority (same day)



Risk Level	Internal Report	External Report
Non-Urgent	DPO (24 hours)	CQC (if applicable) or ICO (if breach)

Template Email:

"Safeguarding Alert – [Employee Name] – [Risk Type]

Details: [Summary]. Immediate actions taken: [List]. Requesting guidance on next steps."

7. EMPLOYER ENGAGEMENT

With Consent: Share only **adjustment needs** (e.g., "Requires reduced hours due to injury").

Without Consent: Override **only** for:

- Prevent Duty (terrorism risk).
 - Court order.
 - Public interest (GMC-approved).
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8. TRAINING & COMPLIANCE

Annual Training: 1-hour interactive module (case studies + GMC scenarios).

Audits:

- Quarterly review of 10% flagged cases.
- Annual penetration testing of safeguarding alert systems.



Violations: Failure to report may result in **disciplinary action up to termination.**

9. GOVERNANCE

Annual Review: By Clinical Lead + DPO.

Trigger Updates: New laws (e.g., Modern Slavery Act amendments).

Contact: [contact@healthbridge.org.uk]

10. VERSION CONTROL

Version	Date	Changes Made	Approved By
1.0	30/07/2025	Initial policy draft.	Dr. James Stanley
1.1	[DD/MM/YYYY]		

Approved by: Dr. James Stanley

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