



Volunteer Policy Booklet



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Registered Charity No. 1050779

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Volunteer Policy

Carers Federation is a free and confidential service that supports communities, carers and their families across Gateshead.

Values of Carers Federation

Carers Federation is committed to the following:

- Carers Federation will not introduce Volunteers to replace paid staff.
- Volunteers will have a defined place in the structure of the organisation.
- Volunteers will be integrated and treated equally as part of the staff team.
- To recognise the individual skills each person brings to the organisation.
- For Volunteers to feel supported and valued in their role.
- To encourage Volunteers to develop and build on existing skills and knowledge through sharing good practice within Carers Federation.

Recruitment Process

- Carers Federation seeks to recruit Volunteers from a diverse range of backgrounds that reflects the make up of the local community.
- Each potential Volunteer will complete an expression of interest form. After an initial screening telephone call they will be asked to submit an application form.
- Each person who volunteers for Carers Federation will be asked for two references.
- Each person who volunteers for Carers Federation and works with vulnerable adults, children or young people will have a **DBS check** that will be carried out before any work takes place. A DBS check is a police check to see if you have committed any offence that would restrict you working with families and children.
- After references and the DBS check clear volunteers will be invited to a meeting to confirm availability and role choice.

Induction and training

- Each Volunteer will receive information about Health and Safety, Equal Opportunities, Confidentiality and Diversity.
- All Volunteers will attend a Carers Federation induction and training programme relevant to their role.
- Relevant external and in house training opportunities will be offered to Volunteers.
- As part of the induction process Volunteers may have the opportunity to shadow a member of staff.
- Each Volunteer will have a three month trial basis to ensure that both Carers Federation and the Volunteer are happy with the role.
- Volunteers will receive a **Volunteer Agreement** and **Role Description** which outline the expectations and the support offered by Carers Federation. This is not a contract.

Diversity

Our organisation is firmly committed to diversity in all areas of its work. We believe that we have much to learn and profit from diverse cultures and perspectives, and that diversity will make our organisation more effective in meeting the needs of all our stakeholders.

We are committed to developing and maintaining an organisation in which differing ideas, abilities, backgrounds and needs are fostered and valued, and where those with diverse backgrounds and experiences are able to participate and contribute. We will regularly evaluate and monitor our progress towards diversity.

Volunteers will be expected to have an understanding and commitment to Equal Opportunities and Diversity.

Supervision and Support

- The Volunteer Co-ordinator and Service Managers at Carers Federation will be the main points of contact.
- Volunteers will have supervision on a one-to-one basis every four to eight weeks.
- Volunteers will be offered a variety of in house and external training to meet the individual needs of their role. Any additional training needs can be discussed with Manager supervising the volunteer during supervision.
- Volunteers will have a Personal Development File which will record their hours of work, training and development.
- The Volunteer Co-ordinator can be contacted Tuesday to Friday within their working hours for support. Outside of this time Service Managers can be contacted in their place.

Safeguarding

The Carers Federation takes the safeguarding and welfare of its staff, volunteers and clients extremely seriously and will take immediate action in any circumstance where the safety and protection of children and vulnerable adults is at stake. It is expected that all volunteers share this commitment. All volunteers will be provided with safeguarding training appropriate to their role and a copy to the Carers Federation's Safeguarding Policy.

Health and Safety

- Volunteers will be aware of general Health and Safety and Personal Safety and will receive information and basic Health and safety training relevant to their role.
- Volunteers should report any incident or accident as soon as possible to a Service Manager or the Volunteer Co-ordinator. In their absence, volunteers should contact the main Carers Federation office 0808 8010350. Serious incidents should be reported immediately and written notes of the incident completed as soon as possible.
- Volunteers should not be exposed to rude, offensive, threatening or violent behaviour. If this occurs, Volunteers should inform their supervisor or other staff member.

Dress Code

Volunteers are expected to dress in a manner that shows consideration to either service users or their colleagues. This will involve volunteers having consideration for and being sensitive to other people's perceptions and beliefs.

Expenses

We value our Volunteers and want to ensure that there are no barriers to Volunteer involvement. All Volunteers will have their travel and other agreed expenses reimbursed. In order to claim expenses an expenses form must be completed and given to the supervising Service Manager.

Insurance

All Volunteers will be covered by The Carers Federation Insurance Policy whilst they are on the premises or engaged in work as a volunteer. It is the responsibility of the Volunteer to inform their motor insurance company if they are using their car for Volunteering and make any necessary adjustments to their policy to ensure they are covered when Volunteering.

Resolving Problems

Carers Federation will try to resolve any problems at the earliest possible stage. For further details refer to The Carers Federation disciplinary and grievance procedures.

- Issues can be raised initially with the Volunteer Co-ordinator.
- In the event that the Volunteer Co-ordinator is not available or the issue involves the Volunteer Co-ordinator Volunteers are able to raise their concerns or issues with service Team Leader.
- We will use the Carers Federation complaints and grievance procedure to deal with issues and complaints. Volunteers will be provided with a copy of the relevant policy and procedure as part of their induction.

Confidentiality

Carers Federation process requires an explicit Confidentiality Policy, which all workers including Volunteers and Staff are obliged to observe.

Code of Conduct

All volunteers are expected to work and behave within the Carers Federation Code of Conduct policy as applicable to their role. This includes –

- Treating everyone with courtesy and respect at all times.
- Not discriminating against an individual in line with equal opportunities legislation.
- Being reliable and punctual, showing honesty, integrity and fairness, and maintaining a professional attitude.
- Dressing appropriately and not in a way that could cause offence or show disrespect to those they are working with.
- Not being under the influence of drugs or alcohol when engaging in work for the service.
- Ensuring their activities do not endanger the health and safety of themselves, other staff, or clients of the service.

Parting Company

Should a Volunteer decide they no longer wish to support us with their time we would ask them to confirm this with the Volunteer Co-ordinator as soon as possible to let us know. The volunteer will be asked to complete an exit questionnaire to help us understand why they wish to leave and how we could improve our volunteering offer.



ALCOHOL AND DRUGS POLICY

1.0 Alcohol or drug misuse or abuse

1.1 Alcohol or drug misuse or abuse can be a serious problem within the workplace. Employees who drink excessively or take unlawful drugs are more likely to work inefficiently, be absent from work, have work-related accidents and endanger their colleagues. The Federation has a duty to protect the health, safety and welfare of all its employees. However, the Federation recognises that, for a number of reasons, employees could develop alcohol or drug related problems. In relation to drugs, these rules apply to those that are unlawful under the criminal law and not to prescribed medication. These provisions aim to promote a responsible attitude to drink and drugs and to offer assistance to employees who may need it.

2.0 Advice and counselling

2.1 It is the Federation's intention to deal constructively and sympathetically with an employee's alcohol or drug related problems, such as alcohol or drug dependency. When it is known that an employee has an alcohol or drug problem, their line manager will discuss options to how and where to seek advice and guidance on suitable treatment. The primary objective of any discussions will be to assist you with the problem in as compassionate and constructive a way as possible. Any discussions of the nature of your alcohol or drugs problems and the record of any treatment will be strictly confidential unless you agree otherwise.

2.2 If you have an alcohol or drug problem, you should always seek appropriate help. If you have an alcohol or drug problem which affects your conduct or performance at work and you refuse the opportunity to receive help, the matter will be referred for action under the Federation's disciplinary procedure as appropriate. Likewise, if after accepting counselling and assistance, and following review and evaluation, your conduct or work performance reverts to the problem level, the matter may also be dealt with through the disciplinary procedure *or capability procedure*.

3.0 Prohibition on alcohol and drug consumption in the workplace

3.1 No alcohol or drugs must be brought onto or consumed on Federation premises at any time. Staff must never drink alcohol or take drugs if they are

required to drive private vehicles on Federation business. Staff must also not drink alcohol or take drugs when they are on operational standby or undertaking on call duties.

3.2 Employees representing the Federation at business/client functions or conferences or attending Federation organised social events outside normal working hours are expected to be moderate if drinking alcohol, *maintain expected levels of conduct as if they were at work* and to take specific action to ensure they are well within the legal limits if they are driving. They are expressly prohibited from taking drugs on these occasions (see the section on Conduct on Federation Business and at Corporate Hospitality Events for more information).

3.3 Social drinking after normal working hours, *not related to the business of the Federation* and away from the Federation's premises is, of course, generally a personal matter and does not directly concern the Federation. The Federation's concern only arises when, because of the pattern or amount of drink involved, the employee's attendance, work performance or conduct at work deteriorates.

3.4 A breach of these provisions is a disciplinary offence and will be dealt with in accordance with the Federation's disciplinary procedure. Depending on the seriousness of the offence, it may amount to potential gross misconduct and could result in the employee's summary dismissal.

4.0 Alcohol and drug related misconduct

4.1 Whilst this policy is aimed at assisting employees with alcohol or drug problems, action will nevertheless be taken under the Federation's disciplinary procedure if misconduct takes place *at work or whilst representing the Federation at a work related event, or whilst attending a social event organised by the Federation, including Christmas meals*, as a result of drinking or taking drugs, or if an employee is found to be under the influence of alcohol or drugs whilst at work. Even a small amount of alcohol can affect work performance and, if an employee is found under the influence of alcohol whilst at work, there could be serious health and safety consequences. The same applies to being under the influence of drugs. Serious incapacity or misconduct caused by an excess of alcohol or drugs at work is a potential gross misconduct offence under the Federation's disciplinary procedure and the employee is therefore liable to be summarily dismissed. This also applies to any employee believed to be buying or selling drugs or in possession of or taking drugs on the Federation's premises.

4.2 The Federation reserves the right in any of these circumstances to arrange for the employee to be escorted from the Federation's premises immediately and sent home without pay for the rest of the day.



Anti-Bribery and Corruption Policy

1. Policy Statement

Carers Federation is committed to maintaining the highest standards of ethical conduct and integrity when conducting business.

Carers Federation interacts on a regular basis with public bodies, local authorities, funding organisations and government departments to tender for new business or new funding contracts, the continuation of existing business or existing funding contracts, grants and funding to secure the delivery of services to carers, clients, service users, the public and communities.

Carers Federation also interacts on a regular basis with private companies who we purchase services from, (our suppliers) for example, suppliers of ICT and telecommunications equipment. Our contracts with private companies are regularly reviewed to ensure the Federation is securing the best possible value for money and service at all times.

In the carrying out of procurement activities the Federation recognises that it is necessary to develop positive, professional and appropriate relationships with employees of the organisation who provide the funding, the contract or the service. This may include proportionate corporate hospitality and gifts but must not include gifts or hospitality which could be deemed excessive or is for the purpose of securing a contract for services, funding or to supply goods - see The Code of Conduct section 5 financial conduct and section 11 gifts and hospitality.

Carers Federation Personal Relationships at Work Policy outlines the action you must take if you develop a personal relationship with a colleague or with someone we do business with and outlines the action we will take to protect our interests and yours.

2. The Bribery Act 2010

The Bribery Act 2010 introduced on 1 July 2011 states that it is a corporate criminal offence for 'failing to prevent bribery'.

What constitutes a 'bribe'

The act defines it as 'giving or receiving and financial or other advantage in connection with the improper performance of a position of trust, or a function that is expected to be performed impartially or in good faith'.

Basically this means a bribe is where a person associated with an organisation either as an employee, board member or agent attempts to gain advantage in securing or retaining business from another by giving the other more favourable or preferential treatment or excessive hospitality or gifts, which are disproportionate and intended to influence them in any decision making associated with the awarding of contracts or funding.

Bribery is a criminal offence and falls under two categories:

- Active Bribery is a criminal offence carried out by an individual in the offering, promising or giving of a bribe
- Passive Bribery is a criminal offence carried out by an individual in the requesting, agreeing to receive or accepting the bribe

Penalties for corporate bribery are an unlimited fine and up to 10 years in prison.

Corporate Hospitality and Gifts

The difference between corporate hospitality/gifts which is genuine and reasonable and bribery is measured by proportionality and connected with a legitimate business activity, for example, attending a drinks reception or celebration event or accepting a bottle of wine on behalf of the organisation is unlikely to be construed as bribery, however accepting a luxury holiday is likely to be viewed excessive. The Code of Conduct provides further guidance on hospitality and gifts.

3. Responsibilities – Six Guiding Principles

1. Proportionate Procedures and safeguards
2. Top Level Commitment
3. Risk Assessment and risk management
4. Exercise due diligence with those do business with
5. Communication and training
6. Monitoring and review

3.1 Procedures and safeguards

This procedure, the Code of Conduct for Employees and the Personal Relationships at Work procedures outline the specific responsibilities of all employees when carrying out their duties for or on behalf of the Federation. It is the responsibility of all employees to conduct themselves in accordance with the Code of Conduct for Employees and to act in a manner which cannot be considered to be participating in bribery activities either active bribery or passive bribery.

Any employee who thinks they may have been offered a bribe, hospitality or gift which appears to be disproportionate or excessive must raise it immediately with their line manager or a senior manager of the Federation.

3.2 Senior Commitment and Governance

Carers Federation Board Members will appoint a member of the board to act as the designated contact for anti-bribery and corruption responsibilities, the day to day responsibilities will be delegated to the Chief Executive.

Instances of concern which is raised by an employee to either their line manager or a member of the senior management will be brought to the attention of the Chief Executive and the designated member of the board.

Where it is considered that there has been a potential bribe this will be raised with the Chief Executive and Chair of the Board.

3.3 Risk Assessment and Risk Management

The Federation will include bribery and corruption on the risk management register and conduct a risk assessment on all business development activities.

3.4 Due Diligence

The Federation will exercise due diligence and as far is reasonably practicable assess the risks associated with organisation with which we do business, submit funding bids to or contract for services with. All employees are expected to exercise due diligence in their interactions with employees or representatives of companies we do business with this includes a commitment not to offer, promise, give, request, agree to receive or accept any bribes when conducting business or representing the organisation in any capacity.

If an employee becomes concerned by what appears to be inappropriate or disproportionate behaviour, promises, hospitality/gifts offered or being offered they should raise this immediately with their line manager or a senior manager of the organisation.

3.5 Communication and Training

Line managers will ensure that all employees are made aware of this policy and make training available to managers and employees as defined by the risk assessment process and risk management practices.

3.6 Monitor and Review

The Federation will monitor activities and review the risk of those activities in line with the risk management process, this policy will be reviewed annually.

4. Breaches of Policy

Potential breaches of this policy will be investigated under the Disciplinary Procedure, an employee found to have offered or accepted a bribe may be summarily dismissed by the Federation and may become subject to criminal proceedings.



Anti-Harassment & Bullying Policy

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1. Purpose of Policy

The purpose of this policy is to ensure all the *Carers Federation* staff are treated with dignity and respect and are free from harassment, intimidation or other forms of bullying at work.

The *Board of Trustees* have been consulted and have agreed the contents of this policy.

This policy is for guidance only and does not form part of your contract of employment.

Breach of this policy will be dealt with under our disciplinary procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.

2. Legislative Framework

Under the Health and Safety at Work Act 1974 we have a duty to provide our staff with a safe place and system of work. This includes a workplace free from harassment, intimidation and bullying. *The Equality Act 2010* includes responsibilities not to harass or discriminate against workers on the grounds of

their sex, sexual orientation, marriage and civil partnership, gender reassignment, race, religion or belief, , disability, or age. In some situations we may also be responsible for the actions of our workers towards each other and towards third parties. In certain circumstances harassment can amount to unlawful discrimination. This policy serves to demonstrate our commitment to identifying and wherever possible eliminating such unlawful *and unacceptable* behaviour.

3. Organisations Commitment

Carers Federation acknowledges that bullying and harassment can be a problem within any organisation and as such is committed to taking every reasonable step to prevent and eradicate bullying and harassment in the workplace. Such steps

- Effective communication through, training courses, training leaflets, websites, emails and notice boards.
- All staff will be educated on bullying and harassment at Induction
- Formal Training of all Managers and Staff on the policy
- Monitoring and review of all cases of bullying and harassment
- Regular review of the policy.

Furthermore, if Carers Federation becomes aware of incidences or communications which have the potential to be in conflict with this commitment and policy, even if they are not reported under this policy, we reserve the right to investigate and take any reasonable and necessary action.

4 Personnel Responsible for Implementation of Policy

Carers Federation's Board of Trustees have overall responsibility for this policy but have delegated day-to-day responsibility for overseeing and implementing action required under it to the CEO. Responsibility for monitoring and reviewing the operations of the policy and any recommendations for change to this policy lies with the CEO.

Duty of Managers

Managers have a specific responsibility to operate within the boundaries of this policy and to facilitate its operation by ensuring that *all* staff understand the standards of behaviour expected of them and by identifying and acting upon behaviour that falls below these standards. Please also refer to the Code of Conduct for staff *and the Behaviours Competency Framework*. Managers will be given training on the relevant legal and operational framework and best practice.

Duty of Employees

All staff are responsible for treating their colleagues with dignity and *to achieve and contribute to achieving harassment free environment. The success of the policy is dependent on staff reading and understanding it.* Staff should disclose any instances of harassment or bullying of which they become aware to their line manager or more senior manager if it involves their line manager. Questions about this policy should be directed to the CEO.

5 Who is covered by the Policy?

This policy covers all individuals working for the Carers Federation at all levels and grades, including senior managers, directors, employees, contractors, home-workers, part-time or fixed-term employees, *volunteers* and agency workers (collectively known as staff in this policy).

6. What are Harassment and Bullying?

Harassment is any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of, *violating a member of staff's* dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment *for that individual*. Harassment generally arises where a staff member has made it clear that they find certain behaviour unwelcome and that behaviour has continued unchanged. Harassment can also arise as a result of a single incident provided it is sufficiently serious. It is important to remember that even though the conduct may only be

unwanted or offensive to one individual it can still amount to harassment. Employees who believe they are subjected to harassment *or bullying* should not hesitate to use the procedures set out below. All staff should consider whether their actions could be offensive to others. Examples of harassment *or bullying* might include:

- a) Unwanted physical contact, ranging from touching or brushing against another individual's body;
- b) *Unwelcome sexual advances – touching, standing too close, display of offensive materials, propositions for or applying pressure for sexual favours, making decisions on the basis of sexual advances being accepted or rejected;*
- c) Continued suggestions for social activity within or outside the workplace after it has been made clear that such suggestions are unwelcome;
- d) *Offensive or intimidating comments or materials;*
- e) *Insensitive jokes or pranks which have the potential to offend, undermine, harm or ridicule an individual or group of individuals, whether or not this is based on a protected characteristic they hold or do not hold;*
- f) Shunning a staff member, for example, by deliberately excluding him or her from conversation;
- g) *Spreading malicious rumours, or insulting someone (particularly on the grounds of age, race, sex, disability, sexual orientation and religion or belief;*
- h) *Copying memos, emails or documents that are critical about an individual or group of individuals to others who do not need to know;*
- i) *Conduct that denigrates, ridicules or is demeaning to an individual for example, singling them out for different treatment or setting them up to fail;*
- j) *Unfair treatment, exclusion or victimisation;*
- k) *Overbearing supervision/appraisal or lack of supervision/appraisal or other misuse of power or position;*
- l) *Making threats or comments about job security without foundation;*
- m) *Deliberately undermining a competent worker by overloading and constant criticism;*
- n) *Preventing individuals progressing by intentionally blocking promotion or training opportunities;*

This is not an exhaustive list of behaviours or actions, the underlying principle is the affect on an individual or group of individuals or the potential affect that a behaviour, action or lack of action could have on an individual or group of individuals.

Bullying means offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power intended to undermine, humiliate, denigrate or injure a colleague. Bullying does not include legitimate and constructive criticism of your performance or behaviour, an occasionally raised voice, or an argument.

This policy covers harassment and bullying which occurs both in the workplace itself and in settings outside the workplace, such as business trips, events or social functions organised for or on behalf of the Carers Federation and on or off our premises.

7. What to do if you have been bullied or harassed: Informal Procedure

If you consider that you are being bullied or harassed, you should initially attempt to resolve the problem informally, explaining clearly to the person responsible that the

behaviour in question is not welcome and that it offends you or makes you uncomfortable. If this is too difficult or embarrassing for you to do on your own, you should seek support from a colleague, your line manager or the service manager. Managers will provide confidential advice and assistance to staff who have been bullied or harassed and will assist in the resolution of any problems, whether through formal or informal means.

If you are in any doubt as to whether an incident or series of incidents which have occurred constitute bullying or harassment, then in the first instance you should approach your line manager or the service manager confidentially, on an informal basis. They will be able to advise you as to how the matter should be dealt with.

If the conduct continues or if it is not appropriate to resolve it informally, you should follow the formal procedure set out below.

8. What do to if you have been bullied or harassed: Formal Procedure

The informal procedure may not be appropriate due to the nature of the harassment or bullying or because you do not feel able to talk directly to the person creating the problem. In these cases or where the informal procedure has been unsuccessful, you should raise your complaint in writing with the service manager or CEO, whose role is to achieve a solution wherever possible and to respect the confidentiality of all concerned. See paragraph 8.3 for details of the information required to be included in your written complaint.

As a general principle, the decision to progress a complaint rests with you. However, as your employer we have a duty to protect all workers and we may pursue a complaint independently if we consider it is appropriate to do so in all the circumstances.

If you wish to make a formal complaint, you should write to the Service manager or CEO setting out full details of the unwanted conduct. These details should include the name of the harasser or bully, the nature of the harassment or bullying, the date(s) and time(s) when the harassment or bullying occurred, the names of any witnesses and any action taken so far to attempt to stop the harassment or bullying.

9. Formal Procedure: Investigation

- 9.1 Complaints will be managed in a timely and confidential manner via an independent investigation to establish full details of what happened. Your name and the name of the alleged harasser will not be divulged other than on a “need to know” basis to those individuals involved in the investigation. At the outset, an investigative officer with suitable experience and no prior involvement in the complaint will be appointed and a timetable will be set down and communicated to all parties. The investigation will be thorough, impartial and objective, and will be carried out with sensitivity and with due respect of all parties concerned.

- 9.2 Consideration will be given to whether the alleged harasser or bully should be redeployed temporarily, or suspended on full pay or whether reporting lines or other managerial arrangements should be altered pending the outcome of the investigation.
- 9.3 As part of the investigation, the investigative officer will meet with you to hear your account of the events leading to your complaint. You have the right to be accompanied by a colleague or a trade union official of your choice. The Investigative Officer will also meet with the alleged harasser or bully who may also be accompanied by a colleague or trade union official of his/her choice. It may also be necessary to interview witnesses to any of the incidents mentioned in your complaint. Where it is necessary to interview witnesses, the importance of confidentiality will be emphasised to them.
- 9.4 At the conclusion of the investigation, the Investigative Officer will submit a report to a Senior Manager nominated to consider the complaint. The Senior Manager will usually report their findings back to you within four weeks of your complaint first being reported. A copy of the Investigative Officer's report together with the Senior Manager's findings will be provided to you and to the alleged harasser.
- 9.5 If the Senior Manager finds that harassment or bullying has occurred, prompt action will be taken to stop the harassment or bullying immediately and prevent its recurrence. The findings will be dealt with under our disciplinary procedure. Consideration will be given to whether the harasser or bully should be dismissed and, if not, whether he or she should remain in his or her current post or be transferred. Even where a complaint is not upheld, (for example, where evidence is inconclusive), consideration will be given to how the ongoing working relationship between you and alleged harasser or bully should be managed. This may involve, for example, arranging some form of mediation or counselling or a change in the duties or reporting lines of either party.

10. Formal Procedure: Appeal

If you are not satisfied with the outcome of the investigation, you have the right to appeal the decision within *10 working days* of being notified of the outcome. You should submit your full written grounds of appeal to the CEO. The CEO may nominate another Officer to hear your appeal. Where practicable this will be a manager senior to the manager who originally considered the complaint (see paragraph 9.4 and paragraph 9.5). The person hearing your appeal will meet with you to discuss your appeal. You may be accompanied by a colleague or a trade union official of your choice. You will be notified of the outcome of the appeal within seven days of this meeting. This is the final stage of the formal procedures.

11. Protection for those making complaints or assisting with an investigation

Staff Members, who in good faith, make complaints under this policy will be protected from intimidation or victimisation in connection with their involvement. If you have been subjected to any such intimidation or victimisation you may raise a complaint in writing under this procedure or the grievance procedure. Staff, who, after investigation, are found to have given information falsely and in bad faith will however be subjected to action under the disciplinary procedure.

We will monitor and review each case to identify future measures we can take to prevent a recurrence of harassment or bullying or to remove environmental factors.

12. Confidentiality

Confidentiality is very important throughout all parts of this procedure. It is the responsibility of everyone involved in the procedure to respect the high level of confidentiality that is required. Breach of confidentiality may give rise to disciplinary action under our disciplinary procedure.

13. Monitoring and Review of Policy

This policy reflects the law and the Carers Federation's practice as at August 2023. The CEO in conjunction with the *Board of Trustees* will be responsible for reviewing this policy from a legislative and operational perspective at least bi-annually.

The CEO has responsibility for ensuring that any personnel who may be involved with investigations or administrative tasks carried out under this policy receives regular training to assist them with these duties.

All staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the CEO.



Complaints Policy

This procedure is for use by complainants from outside Carers Federation and by service users.

How to make a complaint

Carers Federation is strongly committed to investigating complaints promptly and thoroughly, and to learning from them, as part of our commitment to improving our processes and providing high quality services.

Carers Federation defines a complaint as: 'a clear expression of dissatisfaction about the standard of service, action or lack of action by the Federation or its staff affecting an individual or group'.

This information is designed to help you make your complaint. If you require assistance in making a complaint, a member of staff will help you formulate and express your complaint.

Commitment

Carers Federation wishes to settle complaints quickly and informally at your first point of contact. We can normally sort out mistakes and misunderstandings quickly and the people who can best do this are those who provide the service.

If your complaint cannot be resolved in this way, these procedures are here to assist you. Your complaint should be made in writing (via email or letter).

Carers Federation is committed to dealing with all complaints in an efficient and understanding way. To do this we will:

- take all complaints seriously;
- deal with complaints as quickly as possible;
- send an acknowledgement letter to you within five working days if we cannot deal with your complaint immediately;
- aim to send you a final written answer within 10 working days of receiving your complaint;
- keep you regularly informed if we cannot answer you in 10 working days;
- make sure you get a letter explaining the result of your complaint;

- treat you with respect;
- make sure we treat your complaint in confidence;
- look at the pattern of complaints and try to improve areas with continuing problems.

For all complaints, the following three-stage procedure is used. Complaints may be resolved at any of the three stages. You may decide to take a complaint to the next stage if you remain dissatisfied.

Stage 1

Wherever possible we will try to deal with your complaint at the service point involved. At this stage you should speak to the person with whom you have been dealing with when accessing our service, the aim will be to sort out simple mistakes or misunderstandings straightaway. Always keep a record of the details of your complaint, who you spoke to and their response to you. The person investigating will aim to:

- (i) resolve the complaint, or
- (ii) recommend action to whoever is in the best position to resolve the complaint.

Stage 2

If you are unhappy with the way your complaint has been dealt with at stage 1 you should contact the Manager of the service you wish to complain about. The Service Manager will:

- acknowledge that your complaint has been received;
- begin their independent investigation;
- aim to write a reply to you within 10 days detailing the outcome.

If more time is required to investigate, the Manager will write to you giving a time limit for the response.

Stage 3

If you are still unhappy you can write to the Senior Management Team of Carers Federation, your complaint will be looked at independently and thoroughly investigated. The Senior Manager will only investigate your complaint if it has already been investigated under stages 1 and 2 of the complaints procedure. Decisions made at stage 3 are final and cannot be appealed.

Manager' names and contact details at Carers Federation:

Chief Executive - j.bell@carersfederation.co.uk

All complaints submitted in writing should be addressed to a manager (as above) at the following address: *Christopher Cargill House, 21-23 Pelham Road, Nottingham NG5 1AP.*

Whistleblowing

Carers Federation has a policy and procedures for whistleblowing which can be used by the public.

You should use this policy if you have a genuine concern relating to a member of Carers Federation staff or volunteer and that there are reasonable grounds for believing that:

- a) A criminal offence has been committed, is being committed, or is likely to be committed; or
- b) A person has failed, is failing or is likely to fail to comply with their legal obligations; or
- c) A miscarriage of justice has occurred, is occurring, or is likely to occur; or
- d) The health and safety of any individual has been, is being, or is likely to be endangered; or
- e) The environment has been, is being, or is likely to be damaged; or
- f) Any of the above are being, or are likely to be, deliberately concealed.

A copy of the full Whistleblowing policy is available from the Central Support Services Department (CSS) at the above address but we would encourage you to contact them immediately on 0115 9629363 if your concerns fall within any of the above categories.



DATA PROTECTION POLICY

Foreword:

This policy has been updated to reflect the changes to legislation that came into effect on the 25th of May 2018 as a result of the new **General Data Protection Regulation (GDPR)** (2016/679) and is reviewed annually by the CEO.

Changes to this Data Protection Policy

We keep this Data Protection Policy under regular review. This version was last updated in October 2024. Historic versions can be obtained from the CEO, if required.

This Data Protection Policy does not override any applicable national data privacy laws and regulations in the UK.

This policy is divided into two parts each as important as the other. Part One, Sections 1.0 to 6.0, relate to employment, employee records, workers, contractors, volunteers and volunteer records. Part Two Section 7 relates to clients and client files.

Policy Sections

- 1.0 Preamble and Purpose
- 2.0 Data Protection Principles and Carers Federation Staff Information
- 3.0 Your Consent to Personal Information Being Held
- 4.0 Your right to access personal information
- 5.0 Data Protection and Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE)
- 6.0 Your obligations in relation to personal information
- 7.0 Data Protection and Carers Federation Client information
 - Electronic documents/communication
 - Email

- *Telephone*
- *Fax*
- *Non-Electronic Documents*
- *Medical Records*

Part One: Employee/Volunteer files

1.0 Preamble and Purpose

In the course of your work, you may come into contact with and/or use confidential and/or sensitive information about employees, volunteers, clients, customers and suppliers, for example their names and home addresses. GDPR contains principles affecting employees' and client's personal records.

Information protected by GDPR includes not only personal data held on computer but also certain manual records containing personal data, for example employee personnel or client files.

The purpose of these rules is to ensure you do not breach GDPR and to provide you with guidance on handling and retaining data. If you are in any doubt about what you can or cannot disclose and to whom, do not disclose the personal information until you have sought further advice from Carers Federation Data Protection Officer (DPO) or contact your Line Manager for further information. You should be aware that you may be criminally liable, through the powers granted to the Information Commissioner's Office, if you knowingly or recklessly disclose personal data in breach of the Act.

A serious breach of data protection is also a disciplinary offence and will be dealt with under the Federation's disciplinary procedure, for example, if you access another employee's personnel records without authority or breach client confidentiality this constitutes a gross misconduct offence and could lead to your summary dismissal.

GDPR covers both:

- Information Carers Federation stores and processes on its employees, workers and volunteers
- Information Carers Federation stores and processes on its clients

2.0 Data Protection and Carers Federation Staff and Volunteer information

The principles relating to processing of personal data

These data protection principles are central to the legislation. The Federation and all its employees must comply with these principles at all times in their information-handling practices. In brief, the principles say that personal data must be:-

2.1 **Processed fairly and lawfully** and must not be processed unless certain conditions are met in relation to personal data and additional conditions are met in relation to sensitive personal data. Sensitive data is split into two categories – [special category data](#) under Article 9 and [criminal convictions and offences data](#) under Article 10.

The conditions are either that the employee has given consent to the processing, or the processing is necessary for the various purposes set out in the Act. Sensitive personal data may only be processed with the explicit consent of the employee or client and consists of personal data relating to:

- racial or ethnic origin;
 - political opinions;
 - religious or philosophical beliefs;
 - trade union membership;
 - genetic data;
 - biometric data (where used for identification purposes);
 - health;
 - data concerning a person's sex life; and
 - data concerning a person's sexual orientation.
- Criminal offences both committed and alleged.

2.2 **Obtained only for one or more specified and lawful purposes**, collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation'); and not processed in a manner incompatible with those purposes.

2.3 **Adequate, relevant and not excessive**. The Federation will review personnel files on a regular basis to ensure they do not contain a backlog of out-of-date information and to check there is a permitted purpose requiring information to continue to be held.

2.4 **Accurate and kept up to date**. If your personal information changes, for example you change address or you get married and change your surname, you must inform your line manager as soon as practicable so that the Federation's records can be updated. The Federation cannot be held responsible for any errors unless you have notified the Federation of the relevant change.

2.5 **Not kept for longer than is necessary.** The Federation will keep personnel files for no longer than six years after termination of employment in England and five years in Scotland. Files are retained for ten years if the employee worked with children and young people. Different categories of data will be retained for different time periods, depending on legal, operational and financial requirements. Any data that the Federation decides it does not need to hold for a period of time will be destroyed after approximately one year. Data relating to unsuccessful job applicants will only be retained for a period of six months.

2.6 **Processed in accordance with the rights of employees under the Act.** All data will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')

2.7 **Secure.** Technical and organisational measures will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, data. Personnel files are confidential and are stored in locked filing cabinets. Only authorised employees at management level are permitted to have access to these files. Files must not be removed from their normal place of storage without good reason. Personal data stored on diskettes or other removable media must be kept in locked filing cabinets. Personal data held on computer must be stored confidentially by means of password protection, encryption or coding and again only authorised employees are permitted to have access to that data. The Federation has network back-up procedures to ensure that data on computer cannot be accidentally lost or destroyed.

2.8 **Not transferred** to a country or territory outside the European Economic Area.

Record keeping

The UK GDPR requires us to keep full and accurate records of all our data Processing activities.

You must keep and maintain accurate corporate records reflecting our Processing including records of Data Subjects' Consents and procedures for obtaining Consents in accordance with the Company's record-keeping guidelines.

These records should include, at a minimum, the name and contact details of the Controller and the DPO, clear descriptions of the Personal Data types, Data Subject types, Processing activities, Processing purposes, third-party recipients of the Personal Data, Personal Data storage locations, Personal Data transfers, the Personal Data's retention period and a description of the security measures in place. To create the records, data maps should be created which should include the detail set out above together with appropriate data flows.

Reporting a Personal Data Breach

The UK GDPR requires Controllers to notify any Personal Data Breach to the Information Commissioner and, in certain instances, the Data Subject.

We have put in place procedures to deal with any suspected Personal Data Breach and will notify Data Subjects or any applicable regulator where we are legally required to do so.

If you know or suspect that a Personal Data Breach has occurred, do not attempt to investigate the matter yourself. Immediately contact the person or team designated as the key point of contact for Personal Data Breaches (the DPO)

3.0 Your consent to personal information being held

The Federation holds personal data about you and your consent to the Federation processing your personal data is a condition of your employment or volunteering. Therefore, by agreeing to your contract of employment or agreeing to become a volunteer, you also agree to your personal data being held and processed.

The Federation also holds limited sensitive personal data about its employees and, by signing your contract of employment, you give your explicit consent to the Federation's holding and processing that data, for example sickness absence records, health needs and equal opportunities monitoring data. A full Privacy statement outlining the type of information that is collected and what we do with it is provided on commencement of employment or volunteering, additionally the Privacy Statement can also be found on our website.

4.0 Your right to access personal information

Under the provisions of the Act, you have the right on request to receive a copy of the personal data that the Federation holds about you, including your personnel file and to demand that any inaccurate data be corrected or removed. You have the right on request:

- To be told by the Federation whether and for what purpose personal data about you is being processed.
- To be given a description of the personal data and the recipients to whom it may be or has been disclosed.
- To have communicated in an unambiguous form the personal data concerned, and any information available as to the source of the personal data.
- To be informed of the logic involved in computerised decision-making.

The sharing of personal data such as home address, personal contact details may be necessary where there be deemed to be a legal basis and for the purpose of pursuing business reasons in relation to our policies and procedures which govern the conduct, pay and benefits of our employees in the workplace.

Upon request, the Federation will provide you with a written statement regarding the personal data held about you. This will state all the types of personal data the Federation holds and processes about you and the reasons for which the data is processed. If you wish to access a copy of any personal data being held about you, you must make a written request. To make a request, please apply to the Federation's Data Protection Officer, currently the CEO.

If you wish to make a complaint that these rules are not being followed in respect of personal data the Federation holds about you, you should raise the matter with the Federation's Data Protection Officer. If the matter is not resolved to your satisfaction then the matter may be escalated to the Board of Trustees. It may then be raised as a formal grievance under the Federation's grievance procedure.

5.0 Data Protection and Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE)

The Federation has a legislative duty to provide personal and sensitive data (employee liability information) directly to the transferee organisation during the process of a TUPE transfer of employees. The Federation (known as the Transferor) is required, in order to meet the legislative requirements of TUPE to provide, personal, contractual, statutory information directly to the new employer of our employees (known as the transferee).

The Information Commissioners Office Data Protection Good Practice Note, Disclosure of Information under TUPE provides the following guidance:

What information must be given to the new employer?

TUPE requires that the following information (known as 'employee liability information') must be given to the new employer before the transfer takes place.

- *Identity (usually the name) and age of the employees who will transfer.*
- *Information contained in their 'statements of employment particulars', such as written statement of pay, hours of work, holidays and so on (usually contained in the employee's offer letter or contract of employment).*
- *Information about any relevant collective agreements.*
- *Details of any disciplinary action taken against an employee in the last two years.*
- *Details of any grievance action raised by an employee in the last two years.*
- *Details of any legal action (before the court or employment tribunal) brought against the employer by an employee in the last two years and information about any potential legal action.*

Employers must provide this information at least 28 days before the transfer is completed. If special circumstances make this impractical, employers should supply it as soon as possible and explain the reasons for the delay

6.0 Your obligations in relation to personal information

You must ensure you comply with the following guidelines at all times:

- Do not give out confidential personal information except to the data subject himself or herself. In particular, it should not be given to someone from the same family even if they are the designated next of kin or to any other unauthorised third party unless the data subject has given his or her explicit consent in writing to this.
- Be aware that those seeking information sometimes use deception in order to gain access to it. Always verify the identity of the data subject and the legitimacy of the request, particularly before releasing personal information by telephone or email.
- Only transmit personal information between locations by e-mail if a secure network is in place or encryption is used for e-mail.
- If you receive a request for personal information about another employee, you should forward this to the Federation's Data Protection Officer, who will be responsible for dealing with such requests.
- Ensure any personal data you hold is kept securely, either in a locked filing cabinet or, if computerised, it is password protected.
- Compliance with the Act is your responsibility. You will receive annual data protection training. If you have any questions or concerns about the interpretation of these rules, you should take this up with the Federation's Data Protection Officer.

Part Two: Client Files

7.0 Data protection and Carers Federation client information

The data protection principles outlined in 2.0 of this policy apply equally to data we hold on clients and stakeholders. All Carers Federation employees must comply with these principles at all times.

- 7.1 Processed fairly and lawfully. *On all occasions client's consent will be explicitly sought for processing their data especially information relating to sensitive data as outlined in part 2.1 of this policy.*
- 7.2 Obtained only for one or more specified and lawful purposes *in line with service specifications.*
- 7.3 Adequate, relevant and not excessive. *All client files will be subject to file review as part of staff supervision. Reviews will ensure they do not contain out of date information and that there is sound 'case planning' reasons requiring the information to be held.*
- 7.4 Accurate and up to date. *File reviews will establish the accuracy of information and where appropriate and needed, seek to update.*
- 7.5 Not kept longer than necessary. *Each service will have (dependent upon its contractual obligations) protocols for the retention of client data and information.*

Any data the Carers Federation decides it does not need to hold will be destroyed (see below).

7.6 *Processed in accordance with the Carers Federation Confidentiality Policy.*

7.7 *Secure.* *Client files and data are confidential and are stored in locked filing cabinets. Databases and client information held on computers must be password protected with only authorised personnel allowed access.*

7.8 *Not transferred to a country or territory outside the European Economic Area.*

Two of the key principles of the act are particularly important in relation to the services provided by Carers Federation

- *Security*
- *Not kept longer than is necessary*

The importance of the above lie in their capacity to support our commitment to the confidentiality of the client. They help in establishing the trusting relationship so central to all our services.

The following guidance exists to help staff better understand their responsibilities but is not a substitute for staff using professional judgement and acting within the spirit of the act.

*Although these instructions are intended as Carers Federation policy or guidance, exceptions **should** be made in certain circumstances. We need to acknowledge that some of our clients may have certain needs which mean that some of the guidance here is either inappropriate for a particular client or that the guidance actually restricts access to the service. We do not want to be overly bureaucratic or to follow procedures just for the sake of following them. Ultimately all of this is to protect the client so it should be up to the client how best we do this for their particular circumstances.*

*Where a variation is to be made **adequate notes** should be recorded of –*

- *A client's request to vary any of the usual procedures*
- *The reasons for this*
- *That we have complied with their request and amended our procedure*
- *What the requested procedure is*
- *That a manager has been informed of this and that they have authorised it*
- *If there are any capacity issues this would need escalating to the CEO.*

Electronic Documents/Communication

- *All individuals have a responsibility for identifying documents as confidential or restricted.*
- *All restricted electronic documents should be labelled or watermarked as being confidential. It should also make it clear what restrictions apply to the document. For example –*

CONFIDENTIAL DOCUMENT – Team Leaders, Service Managers and above only

- All staff will be allocated a secure folder on their local server in which to store confidential documents.
- Access to databases will be restricted to service personnel working with the client group.
- All unattended computers shall be log in and password protected with staff ensuring that no one, at any time can access confidential areas of the server. When leaving a computer, the staff member must ensure the screen is locked.

We will increasingly be asked to communicate with clients by email and electronic mechanisms. We must remain especially vigilant to this and ensure that this does not accidentally compromise our commitment to confidentiality and data protection.

Email

Staff should be mindful of the fact that emails are by default un-secure. There are methods of making emails secure – such as encryption – but as this requires special software for both the sender and the recipient it is impractical for working with clients.

There are a number of processes we can go through – depending on the nature and content of the email – to ensure that we have done as much as is reasonably expected of us to get the information to the correct client and that only they can view it.

Ask if the client wants to communicate by email and to what extent they want to communicate in this way – we need to make sure that even though they may have given us their email address on first contact they definitely want us to use it to communicate with them. We also need to ask what we can send them by email – letters, responses, personal details – as email addresses are not always private to that individual (e.g., work addresses)

Ensure we have the correct email address – the email address given on first contact may not be the one that the client wants all future communication on so we need to check this. Having agreed in the first step of the process how the client wants to communicate using email then we need to check the email has been recorded accurately.

The client should be told over the phone that we will send them a brief email containing no personal details. They should then reply to this email to confirm that we are using the correct address.

Communicating by email – having established that the email address is correct we can then use it to communicate as per the client's instructions. If the client wants to use it simply for updates or to arrange meeting dates and times then this can be done within the body of the email.

If however the client wants us to send letters or other documents which are sensitive or contain personal information then **we must password protect them**.

Again, should you feel that this process is not suitable for a particular client for example a client with additional needs then the process can be varied provided adequate notes have been made and that it's checked with a manager.

N.B. It should be password protected to prevent it from being opened – not from being edited.

The password should be individual for the client but based on the same format so that another member of staff can access any files.

The password will be made up of a CR number followed by the worker's initials – e.g., cr/123456dl

Including the letters 'cr' and also the '/' as well as the numbers and advocate's initials will mean that not only is the password a secure length but it has a good mixture of letters, characters and numbers.

N.B. The password should be told to the client over the phone and shouldn't be sent to them in the body of any email. If the client has asked for email correspondence only and doesn't want to talk over the phone then they should be asked how they want to receive the password. Again, if they want to opt out of this process then this is open to them but must be recorded.

Telephone

There has been a lot of publicity recently about sensitive information having been obtained fraudulently over the phone. Whilst we are not an obvious target for fraudsters we should acknowledge that the information we hold on clients is often deeply sensitive and personal and that we have a responsibility to keep it confidential to the client who is often a vulnerable adult or child.

Recognising the nature of our service and often the types of clients we support we should take a common sense and proportionate approach towards checking identity.

*Situations will vary as will clients but at minimum we should look to confirm the identity of who we are dealing with by confirming their **date of birth** and **post code**.*

Common sense will dictate that given the nature of what we do and how we do it we will only check these details if –

- They are a new client and you haven't spoken to them yet*
- You have spoken to them before but on this occasion you don't recognise their voice or have other doubts about their identity*

On both of these occasions it should be recorded that these questions have been asked.

Non-Electronic Documents

- All non-electronic documents – for example post – must be stamped **CONFIDENTIAL**. It is then the intended recipient's responsibility to treat the document as confidential.*

- Confidential or restricted documents must always be either kept in a locked storage cabinet and within a locked room.
- If kept within a locked room the room must only be accessible to those people who have the same level of access.
- During the working day confidential or restricted documents must not be left out on desks for longer than is necessary and never unattended
- At the end of a working day documents must be stored in a locked container.
- Confidential or restricted documents must not be visible at any time to unauthorised members of staff, visitors or the public.
- Once a confidential or restricted document is finished with it should either be filed in a secure storage container or destroyed.
- Documents must be destroyed by shredding. This should be done in a timely manner in line with service specifications and local protocols.

Medical Records

We must not hold on to medical records, health records or medical charts for any longer than is absolutely necessary.

The terms **medical record**, **health record**, and **medical chart** describe the systematic documentation of a single patient's [medical history](#) and [care](#) across time within one particular health care provider's jurisdiction. The medical record includes a variety of types of "notes" entered over time by health care professionals, recording observations and administration of drugs and therapies, orders for the administration of drugs and therapies, test results, x-rays, reports, etc.

If it is not possible to post the records out that day recorded delivery then they must be locked away in the client file. A reminder will be entered for the next day to retrieve the records and post them.

.....
Staff should ensure that they read this Policy in conjunction with:

- Carers Federation Privacy Statement 'Employees'
- Carers Federation Privacy Statement 'Clients'
- Carers Federation Confidentiality Policy
- Carers Federation Office Moves Procedure
- Local service protocols for retention/destruction of client information /record deletion logs.

Acknowledgement of receipt and review

I, [EMPLOYEE NAME], acknowledge that on [DATE], I received and read a copy of the Carer's Federation Data Protection Policy dated October 2022 and understand that I am responsible for knowing and abiding by its terms. I understand that the information in this Data Protection Policy is intended to help Company Personnel work together effectively on assigned job responsibilities and assist in the use and protection of Personal Data.

This Data Protection Policy does not set terms or conditions of employment or form part of an employment contract.

Signed

Printed Name Date



Grievance and Disputes Resolution Policy and Procedure

This *grievance and disputes policy and procedure* is for guidance only and does not form part of your contract of employment. It applies to all employees regardless of their length of service. It does not apply to agency workers, self employed contractors or *former employees*.

Content:

1.1 Policy Statement of Intent

1.2 Mediation

1.3 Timescales

1.4 Definitions

2.1 Grievance and Disputes Procedure Application

2.2 Principles and Expectations

2.3 Roles and Responsibilities

2.4 Equal Opportunities Reasonable Adjustments

2.5 Overlapping Grievance and Disciplinary Matters

3.1 Steps to Resolution

3.2 Step One – Verbal and Informal Discussion

3.3 Step Two – Formal Meeting and Written Grievances

3.4 Step Three – Formal Appeal

4.0 Keeping Written Records

1.1 Policy Statement of Intent

It is the intention of Carers Federation to seek to resolve workplace complaints, conflict or disputes (collectively known as grievances) within a reasonable timeframe and to a satisfactory and constructive conclusion through a respectful and transparent framework.

1.2 Mediation

At any time during the consideration of the complaint, conflict or dispute mediation by a trained internal or external mediator can be used to bring about resolution.

Mediation is an alternative method of informal resolution. Mediation is a process which brings people together in the presence of an impartial third party who facilitates a resolution. The participants to the process (and not the mediator) decide on the terms of any resolution (the agreement). The agreement is usually, but not always, a written document which sets out the actions that both parties agree will resolve the complaint, conflict or dispute.

Mediation is a voluntary process that encourages feelings to be aired and empowers those involved. It is most effective when both parties are willing to resolve matters and reach a solution. Mediation can be accessed through the Human Resource Officer.

1.3 Timescales

The timescales set out in the procedure are suitable in most cases, however, if the matter being raised is complex or requires further investigations the timescales can be extended to allow for a thorough investigation and assessment of all matters, this includes, facts, perceptions, context and desired outcomes. Likewise, if mediation is requested the timescales and procedural process will pause to enable the mediation process to complete, after which the procedural process will either conclude as resolution has been achieved or will resume if mediation has not successfully resulted in a resolution (agreement) being reached.

It is our policy to ensure that all employees have access to a procedure to help resolve grievances and disputes relating to their employment quickly and fairly.

All timescales referred to in this policy and procedure are in working days e.g. 10 days is 10 working days.

1.4 Definitions

A grievance is a problem, concern or dissatisfaction felt by an employee or group of employees in relation to their work, working conditions or work relationships that they wish to talk about with management, howsoever it has arisen. A grievance can occur as a result of a passing comment, comments made in supervision, written communication, a letter of resignation, allocation or distribution of resources, actions or inactions of the employer.

Issues which may give rise to a grievance include terms and conditions of employment, health and safety, work relations, new working practices, organisational change, work environment, bullying, harassment and discrimination. (ACAS, Code of Practice for Grievances).

Other relevant and complimentary Carers Federation policies include, Anti-bullying and Harassment Policy, Equal Opportunities Policy, Health and Safety Policy

Individual Grievance – raised by a sole employee in relation to a matter which affects them, their work, working conditions or work relationships

Collective Grievance – raised by more than one employee in relation to a matter or matters which affect them, their work, work conditions or work relationships.

The procedure will apply to both individual and collective grievances and follows the ACAS Code of Practice for Grievances

Victimisation is the detrimental treatment of an individual, arising from the individual raising a complaint or intending to raise a complaint about discrimination or harassment, or acting as a witness for another who is raising such a complaint.

Printed copies are UNCONTROLLED. It is the user's responsibility to verify printed copies against the controlled document.

Grievance and Disputes Resolution Procedure

2.1 Application

All employees of Carers Federation have a right to raise a grievance relating to their employment and have it settled fairly and without undue delay. This procedure applies to all employees.

Complaints raised by an individual after they have left Carers Federation employment will be dealt with in accordance with Carers Federation Complaints Policy and Procedure.

We may vary this procedure as appropriate to a particular case. The procedure may also be discontinued if it becomes impracticable for either party to continue with it. In any case we will inform you in writing of the final outcome of your grievance.

2.2 Principles and Expectations

The policy and procedure draws on the seven principles contained in Carers Federation Code of Conduct:

- 1. Selflessness*
- 2. Integrity*
- 3. Objectivity*
- 4. Accountability*
- 5. Openness*
- 6. Honesty*
- 7. Leadership*

It is expected that all involved will enter the grievance process and any attached mediation process with a desire to:

- Seek resolution at the earliest opportunity*
- Listen, be open and honest*
- Seek to deal with issues thoroughly and within reasonable timescales*
- Behave with integrity*
- Reflect, learn and seek to prevent recurrence*

Appropriate Person

To be able to resolve complaints, conflicts or disputes at the earliest opportunity it is essential to identify the most appropriate person to raise the matter with. An appropriate person is the person who is most likely able to make a decision that resolves the matter, depending on the nature of the complaint, conflict or dispute (see 1.4 definitions) at the earliest opportunity and ideally at the informal stage, for example this may be:

- Immediate Line Manager*
- Immediate Line Managers' Manager*
- Alternative Manager*
- Human Resource Representative*
- Health and Safety Representative*

There are three steps to resolving complaints, conflict or disputes; in all cases the aim is to resolve at Step one, the informal stage. If this is not possible then Step two the formal stage will be the route to resolution. Step Three is the appeal stage.

2.3 Roles and Responsibilities

Manager's responsibility

Managers should ensure that they are approachable and available to employees for them to be able to talk through their issues. A manager should guide the employee to consider objectively their concerns and to draw out the specifics to determine whether or not there is an actual grievance that can be resolved (see 1.4 definitions).

It is the manager's responsibility to ensure issues and concerns of their staff are picked up and resolved as early as possible. Managers should be able to identify when a problem occurs and be able to solve it there and then or at supervision.

Employee's Responsibility

It is the employee's responsibility to ensure they access opportunities to talk through their issues and concerns with the appropriate person to identify the specifics and determine whether or not there is an actual grievance that can be resolved.

Where the grievance relates to an employee's immediate line manager they may raise it with the next level of management.

The Role of the Board of Trustees

Only in exceptional cases will the Chair of the Board of Trustees, or their representative, be involved in any steps of the procedure. Exceptional cases are defined as:

- *Grievances of or involving the Chief Executive*
- *Grievance appeals of the Chief Executive*
- *Grievances and subsequent appeals where appropriate which involve a Member of the Board of Trustees.*

CSS Responsibility

Through liaison with the CF HR support service (Alcumus) CSS will provide advice and guidance to managers, employees, and members of the Board of Trustees throughout. Where mediation is requested CSS will source an external Qualified Workplace Mediator to facilitate the mediation process.

Recognising that raising a grievance can be stressful, the procedure allows an employee to be accompanied to any formal meetings by a companion (*Work colleague or Trade Union Representative*) of their choice. Either party may ask for a member of the CSS team to be present.

2.4 Equal Opportunities Reasonable Adjustments

If you have difficulty at any stage of the grievance procedure because of a disability, you must bring this to the attention of *your line manager or CSS*. *All reasonable steps will be taken to make adjustments to the procedure and process to enable you to fully participate.*

Any requests for reasonable adjustments must be dealt with fairly and strictly in accordance with the Carers Federation's established policies, in particular the Equal Opportunities Policy.

There will be no victimisation of any employee who raises a grievance.

2.5 Overlapping Grievance and Disciplinary Matters

Raising a grievance during the disciplinary process will not necessarily delay any action being taken under Carers Federation's disciplinary procedure. *Depending on the nature of the grievance, the disciplinary process may be temporarily suspended in order to deal with the grievance, the grievance and disciplinary matters may be dealt with concurrently, or the grievance may be temporarily suspended in order to complete the disciplinary process.*

3.1 Steps to Resolution

Step One - Verbal and Informal Discussion

Step Two - Formal Meeting and Written Grievances

Step Three – Formal Appeal

3.2 Step One - Verbal and informal discussion with the appropriate person

In most cases it is the intention of this procedure that complaints, conflict or disputes (grievances) will be resolved at Step One, informally. Where a grievance is referred to the formal steps, both the employee and the appropriate person will be expected to show what steps they have taken to achieve a reasonable solution, where appropriate or possible, to the problem. It is best for all parties to achieve resolution at this informal step. If Mediation is to occur at this stage, it must be entered into in good faith by all parties, both parties must voluntarily agree to Mediation.

The aggrieved employee should meet informally and discuss the issue with the *most appropriate person*. If the *employee has* concerns in relation to their immediate line manager both parties should try to agree a *route to resolution, this may include requesting another manager provides assistance to aid them to reach a solution*. If this can not be done then the process moves to Step 2.

Informal discussions must take place in a private and confidential setting; sufficient time must be allowed to thoroughly talk through the problem, concern or dissatisfaction to enable an appropriate resolution, where possible, to be achieved.

3.2 Step Two - Formal Meeting and Written Grievances

If resolution cannot be reached at Step One, the employee should move on to Step Two. *At Step Two the grievance must be in writing.*

With the aim of resolving the complaint, conflict or dispute (grievance) at the earliest opportunity, the grievance must be put in writing and sent to the appropriate person.

The written grievance must be submitted within a reasonable period (usually ten days) of the most recent decision or event (this may be the end of Step One) and must include the following:

- *Sufficient detail about the latest decision or event*
- *Sufficient detail about the matter which remains unresolved*
- *Sufficient detail of steps taken to resolve the matter, and*
- *An outline of how you see the matter could be reasonably resolved.*

Verbal submissions of a grievance will not be accepted at this stage.

We will handle the grievance at Step Two by doing the following:

- *Acknowledge receipt of the grievance*
- *Identify and confirm the appropriate person (deciding officer) who will be considering the grievance*
- *Communicate with you within ten days, either to keep you informed of progress or to invite you to a formal meeting*
- *Confirm your right to be accompanied by a work colleague or a trade union representative*
- *Keep you informed of progress throughout the process until the decision is made*
- *Confirm the decision in writing, either to uphold, not uphold or partly uphold the grievance and provide an opportunity to appeal*

Companion - Can be a colleague or a trade union representative. The companion may address a hearing to sum up the employee's case, respond on behalf of the employee to any views expressed and they may confer with the employee. The companion does not however, have the right to answer questions on the employee's behalf, address the hearing if the employee does not wish it or prevent the employer from explaining their case.

Further additional complaints will not normally be permitted at the hearing stage.

Where a hearing is adjourned for further investigation, or for any other unavoidable reason, the employee must be kept informed of progress and a date set for the resumed hearing. *The notes of the formal meeting will be agreed at the meeting, a copy provided to the employee and a copy kept in the case file.*

3.3 Step Three - Formal Appeal

Should the employee feel that their grievance has not been satisfactorily resolved, they

have *ten working days* from *receipt of the decision* to appeal in writing stating their full grounds of the appeal.

The grounds for appeal must focus on at least one of three main areas and provide evidence to support the appeal:

- *The decision and actions proposed do not satisfactorily resolve the grievance*
- *The investigation was insufficient to enable an appropriate resolution to be achieved*
- *The policy, procedure and processes were not followed*

Wherever possible, the appeal will be dealt with by someone who has not already been involved in the grievance; we will write to the employee and invite them to an appeal hearing which ideally will be held no more than ten working days after the appeal has been received, if this is not possible, the employee will be informed of reasons for the delay and an expected timeframe for the hearing.

The employee may bring a companion to the hearing, a work colleague or Trade Union Representative.

No new evidence or witnesses can be introduced by either side at this stage, except with the prior agreement of the Senior Manager hearing the appeal.

The final decision will be sent to the employee in writing within ten days of the hearing, *if this is not achievable the employee will be informed of the delay*. A meeting may be held to give the decision but in all cases it will be confirmed in writing.

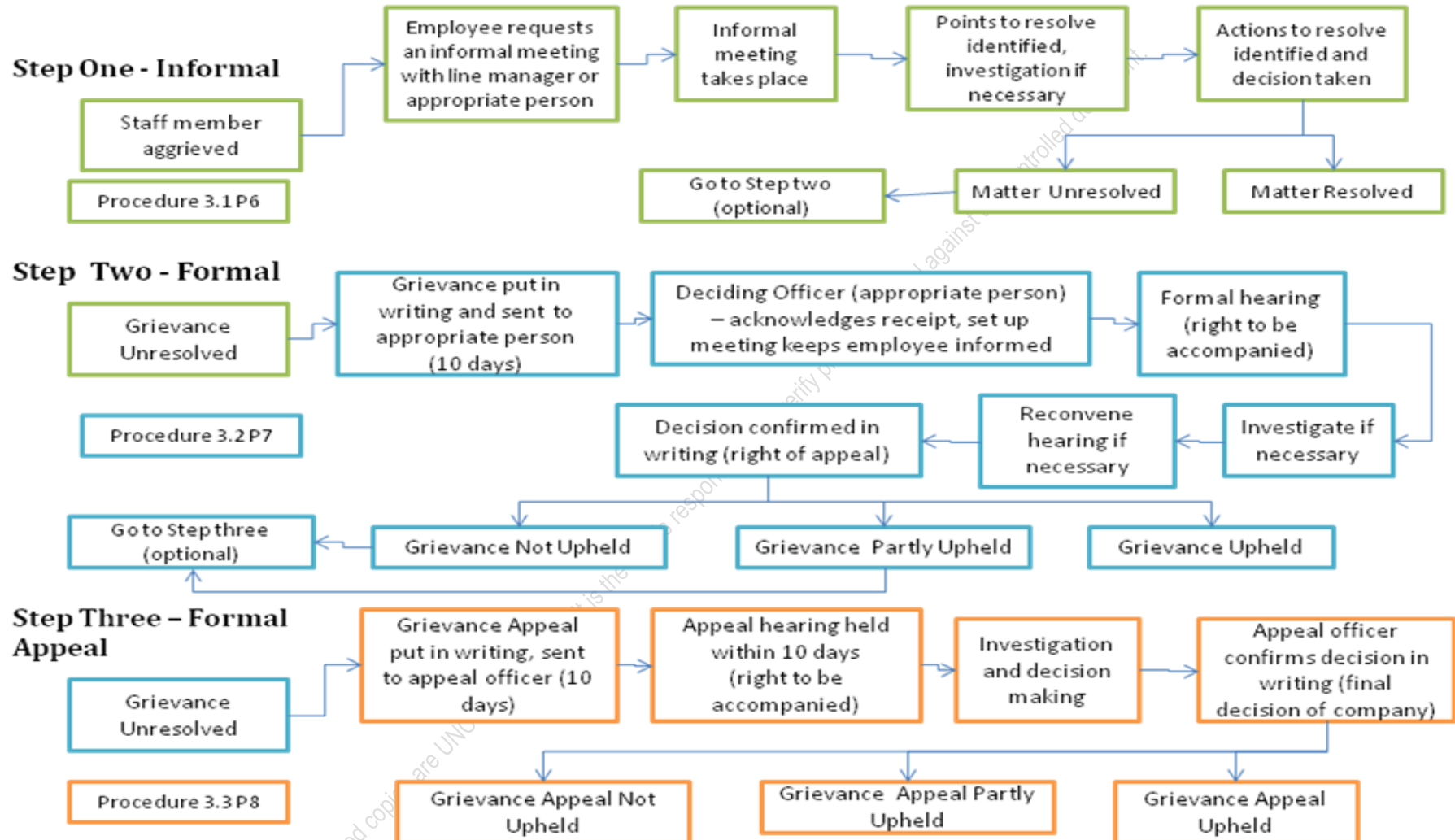
4.1 Keeping Written Records

A case file will be established for each *formal* grievance which will include; *the nature of the complaint, notes of all formal meetings, decisions made and actions taken, reasons for the actions, details of an appeal, the appeal outcome and any further developments.*

Written grievances, the decision and actions, appeal and appeal outcome (where relevant) will be placed on your personnel file *as soon as reasonably practicable*.

An employee will be given access to information relating to the grievance except where there is a need for confidentiality to be maintained, e.g. relating to personal information of other employees. Where a request for information is unreasonably denied, this may form part of the grievance.

Grievance and Disputes Resolution flowchart



Printed copies are UNCONTROLLED. It is the user's responsibility to verify printed material against the controlled document.



SAFEGUARDING POLICY: ADULTS WITH CARE AND SUPPORT NEEDS (PART 1)

Overarching Policy

Definitions

Adult at risk:

An adult at risk is *any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support* (Care Act 2014 [England]). This definition is broadly consistent with definitions across the devolved nations. In Scotland, the definition of an 'adult at risk' or 'vulnerable adult' applies to those aged 16 years and over. In Northern Ireland the definition is, helpfully, broken down to assist in understanding as follows:

Adult at risk of harm:

An adult at risk of harm is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their: Personal characteristics which may include, but are not limited to, age, disability, special educational needs, illness, mental or physical frailty or impairment of, or disturbance in, the functioning of the mind or brain and/or Life circumstances which may include, but are not limited to, isolation, socio-economic factors and environmental living conditions.

1. Introduction

1.1 The Federation supports both carers and those they care for and this Policy is designed to highlight issues arising when staff and volunteers are *working* with Adults at Risk.

1.2 For the purpose of this document an Adult with care and support needs is a person who is over the age of 18 and is unable to care for themselves or assert themselves against abuse due to possibly being frail or old, having mental health issues, a physical illness or some form of disability. Individuals who suffer in this way may be more open to abuse, neglect and possible exploitation by other individuals. Carers Federation recognises this and will ensure that the carers it supports are similarly informed.

1.3 It is fundamental to this safeguarding policy that the welfare of the client is always regarded as paramount. All Adults with care and support needs have a right to safeguarding from abuse irrespective of their culture, ability, gender, language, racial origin, religious belief and/or sexual identity. It is acknowledged that all suspicions and allegations of abuse will be taken seriously and responded to swiftly, appropriately and professionally. All members of the Federation irrespective of the role being performed have a responsibility to understand and adhere to this policy and report all concerns to the appropriate officer.

2. Why the policy is important and legal context

The Carers Federation has a legal responsibility to prevent and report concerns about the abuse, neglect and ill-treatment of adults who are at risk of being harmed, alongside its responsibility to protect children who have suffered abuse.

Statutory guidance means that the Carers Federation adheres to the framework of relevant legislation and statutory guidance in the countries in which it operates. The relevant law and guidance are as follows:

The Care Act 2014, which came into effect in 2015, is the primary legislation in England for the support and protection of adults. It represents the most significant reform of care and support in more than 60 years, putting people and their carers in control of their care and support.

<https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

The legislation sets out how people's care and support needs should be met, and introduces the right to an assessment for anyone, including carers and self-funders, in need of support.

The act's "wellbeing principle" spells out a local authority's duty to ensure people's wellbeing is at the centre of all it does with greater emphasis on outcomes and helping people to connect with their local community. It seeks to ensure that people's eligibility for services will be the same across England.

Guidance on safeguarding vulnerable adults, which in England had taken the form of the 'No Secrets' (2000) guidance, has been replaced by statutory guidance issued under the legislation which is the Care and Support Statutory Guidance (revised October 2018):

<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

This guidance is the adult equivalent of *Working Together to Safeguard Children* (Department for Education, 2018) for those seeking to support and protect adults at risk.

There are legal requirements on statutory bodies under the Care Act 2014, and statutory guidance (Care and Support Statutory Guidance 2018) applying to the voluntary sector across England and the devolved nations, for organisations to do everything they can to recognise and report abuse quickly and appropriately to keep adults safe, and to prevent such abuse from happening in the first place.

Anyone who is employed or volunteers for or, on behalf of the Carers Federation, regardless of the type or amount of contact they have with adults who are at risk of abuse or vulnerable adults, has a role to play in safeguarding and protecting them. They must:

- Know how to recognise potential abuse of adults at risk/vulnerable adults
- Know what to do when safeguarding concerns arise
- Understand what Carers Federation expects of them in terms of their own behaviour and actions
- Act in accordance with this policy
- Awareness of locality procedures within area of operations

An adult at risk of abuse can be anyone over the age of eighteen, including service users, staff or volunteers. Whilst personal characteristics may make an individual more vulnerable i.e. disability and communication difficulties, it is the situation around an individual which may increase risk or place them at potential risk of harm. It is therefore vital to be open to the possibility that any adult may be at risk and that this can be temporary or on-going depending on the support and protective factors around them.

Professional fundraising agents, subcontractors, third-parties and assignees involved in services for Carers Federation parties must comply with Carers Federation's safeguarding policies, legislation and all relevant regulatory codes of conduct including the Institute of Fundraising's code of practice when dealing with donors and prospective donors.

This policy applies to all staff and volunteers (including trustees and interns), secondees, agency staff, students, sole traders and contractors, including associates and professional fundraising agencies.

For more information about the key legislation and government initiatives in relation to the protection of adults at risk go to: <https://www.anncrafttrust.org/resources/>

3. Key Principles

The Carers Federation's approach to safeguarding adults at risk is based on the following principles:

- All adults have a right to equal protection from all types of harm or abuse, regardless of age, ability, gender, racial heritage, religious beliefs, sexual orientation or personal characteristics which may indicate additional vulnerabilities
- The best interests of the adult are paramount in all considerations about the safeguarding and protection of adults at risk
- Where concerns are identified, the key principles of working with adults at risk embedded in the Care Act 2014, will inform Carers Federation's approach to interventions at all times
- Where a concern is identified, we must communicate very clearly what we have done and will be doing to safeguard the adult at risk, unless to do so would in any way increase risk to them or a child. Capacity will be assumed unless there is reason to believe that the person cannot understand
- Where we are working together with adults at risk, their carers', family members and other agencies, it is essential to recognise that, in some limited circumstances, it will not be appropriate to engage with carers or family members in order to protect the adult at risk
- Concerns or allegations that Carers Federation staff or volunteers have abused or neglected adults will be taken very seriously and managed sensitively and fairly in accordance with these policies, relevant legislation and local procedures

4. Types of abuse in adults.

Eleven types of abuse are identified through the legislation and guidance framework.

- Physical abuse – Involves any manner of causing physical harm to a vulnerable adult. This could include fabricating or inducing illness.
- Domestic Abuse – Including, psychological, sexual, financial, emotional and honour-based violence.
- Sexual abuse – Forcing or inciting any vulnerable adult to take part in any form of sexual activity. Inducing a vulnerable adult to behave in sexually inappropriate ways.
- Psychological abuse – Persistent emotional ill treatment of a vulnerable adult to cause severe and enduring effects on their emotional state/development.
- Financial Abuse – Including, fraud, theft, coercion and internet scamming.
- Modern Slavery – Slavery, forced labour, domestic servitude and human trafficking.
- Discriminatory Abuse – Harassment or slurs on the grounds of race, religion, faith, disability, gender, age, sexual orientation.
- Organisational abuse – Neglect or poor levels of care within an institution or care setting.
- Neglect and acts of omission – The persistent failure to meet a vulnerable adults needs, be they physical or emotional.
- Self Neglect – Failing to care for one's own basic physical or emotional needs in order to cause harm to oneself.

- Hate Crime – A criminal offence motivated by hostility or prejudice.

There are additional types of harm that are not included in The Care Act, but they are also relevant to safeguarding adults.

Cyber Bullying: Cyber bullying occurs when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages. It can also involve using online forums with the intention of harming, damaging, humiliating, or isolating another person. It includes various types of bullying, including racist bullying, homophobic bullying, or bullying related to special education needs and disabilities.

Forced Marriage: This is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of a third party in identifying a spouse. The Anti-Social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.

Female Genital Mutilation: FGM comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons (WHO). It is also sometimes referred to as female genital cutting or female circumcision.

Mate Crime: A "mate crime" is when "vulnerable people are befriending by members of the community who go on to exploit and take advantage of them" (Safety Network Project, ARC). It may not be an illegal act, but it still has a negative effect on the individual. A mate crime is carried out by someone the adult knows, and it often happens in private.

Cuckooing: When someone's home is targeted and taken over to sell drugs by criminal gangs.

Radicalisation: The aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable individuals to the legitimacy of a cause. This may be direct through a relationship, or through social media.

5. Promoting Good Practice

5.1 The abuse of a Vulnerable Adult can occur in a number of ways and could be affected by any individual or service provider who is able to have regular contact with the Vulnerable Adult. Regular contact implies a constant pattern of contact, even if this may be for short periods dispersed over certain periods of time, such as a week. It is important therefore that all Carers Federation staff and volunteers are alert to the vulnerability of clients.

5.2 Abuse can occur within many situations, including the home, care homes or other institutions. Carers Federation staff are in a good position to make assessments as to the standard of care people experience and the potential for adults with care and support needs to be abused.

5.3 It is strongly recommended that all staff and volunteers should be mindful to set an excellent role model for clients. Professional boundaries must be maintained at all times. (See also Carers Federation Code of Conduct). Carers Federation is committed to zero tolerance of abuse and neglect within our organization.

6. Selection of Staff

6.1 It is expected that all prospective staff and volunteers will complete an application form. This will elicit information about the candidate's past and a self disclosure about any criminal record. All relevant posts will be subject to an Enhanced Check with the Disclosure and Barring Service (DBS) check.

6.2 Where the post entails direct work with clients, two confidential references should be taken up and confirmed directly with the referee.

6.3 Federation staff and volunteers must be prepared to provide evidence of identity.

6.4 No member of staff or volunteer should be permitted to provide support to clients until the application form has been completed in full, including sections on criminal records and self disclosures. Any qualifications quoted must be substantiated and the applicant must sign to acknowledge adherence to this policy document.

Carers Federation operates in line with Safer Recruitment-for further information around Safer recruitment: <https://www.anncrafttrust.org/resources/safe-recruitment-process/>

7. Proactive role of Federation

7.1 The Federation will appoint a member of the Senior Management Team as nominated Child and Adult Safeguarding Officer. It will be that person's responsibility to implement the policy set out in this document and keep updated to reflect any changes to relevant legislation regardless of review cycle (12 months).

This section should be read in conjunction with the Managing Allegations Policy and Whistleblowing Policy, and any queries should be raised directly with the Safeguarding Lead.

7.2 Each service will have a person with designated Safeguarding responsibilities. This should usually be the service manager or team leader and will be the named Safeguarding Lead.

7.3 All front-line staff will undertake the dedicated safeguarding training via Carers Federation Virtual Learning Environment as part of their induction and annually thereafter; where required additional training will be sought for bespoke requirements and will be accessed via relevant reputable providers. Carers Federation staff should be alert to potential abuse and act where appropriate to minimize risk and prevent abuse of vulnerable people.

7.4 All complaints or allegations made against a member of staff or volunteer in respect of abuse must be reported immediately to the Safeguarding Officer. If the complaint or allegation relates to the Safeguarding Officer in person, it must be reported to the Chair of the Board of Trustees. Also see Whistleblowing Policy.

7.5 If there are concerns about suspected abuse of any adult at risk, that suspicion must be referred immediately to your line manager/Safeguarding lead who will take such steps as considered necessary. They will consider the need to break any confidentiality undertakings that have been given by the Carers Federation to the client and make the decision to report these suspicions as appropriate.

7.6 The line manager/Safeguarding Lead will refer the allegation to the local Adult Social Care department or police without delay. Where appropriate the client should be informed that this action is being taken.

7.7 All concerns referred to Carers Federation staff shall be dealt with confidentially and information only shared on a need-to-know basis.

8. Role of managers and team leaders

8.1 To ensure that the Federation's Adults with Care and Support Needs policy and procedures are followed and particularly to inform Adult Social Care of relevant concerns about individual clients.

8.2 If the abuse is a crime, such as theft or assault, then the police must be involved in order to prevent this type of crime being committed in respect of other Adults at Risk.

8.3 Ensure that appropriate information is available at the time of any referral and that written records are kept.

8.4 Liaise with Adult Social Care and other agencies as appropriate.

8.5 Keep the Carers Federation Safeguarding Officer informed of any action taken and any further action required.

8.6 Ensure that an individual case record is maintained including action taken, what liaison there has been with other agencies and the outcome.

9. Role of Safeguarding Officer

9.1. The Safeguarding Officer will advise Carers Federation of training needs in respect of working with Adults at Risk and undertake the relevant training in line with the role.

9.2. The Safeguarding Officer will collate information on Carers Federation work with vulnerable clients and provide information, training and advice on abuse and safeguarding issues to Federation staff and volunteers.

10. Records

10.1. All staff and volunteers must keep written records (in line with GDPR protocols) of concerns about adults with care and support needs even where there is no need to refer the matter. This includes any risk assessments carried out in respect of the client. All records kept should be stored in locked locations and in line with Carers Federation GDPR policies.

10.2. Regardless of the outcome of any suspicion or allegation of abuse, all details must be recorded by the member of staff involved. Important information to record includes: -

- The date and time that the suspicion, allegation or actual abuse incident is reported to the member of staff or volunteer.
- Details given to staff about the above to include date and time of when incidents occurred.
- Any details of the parties involved or potentially involved.
- Details of what action the staff member has taken.
- Details of reporting i.e., to whom and when.
- These notes must be signed off by the line manager and a copy sent to the Safeguarding Officer

Safeguarding Contacts

Safeguarding Officer & SMT approval of policy: Signed:  December 2023	Carers Federation CEO Jayne Bell Mob: 07525 237735 Email: j.bell@carersfederation.co.uk
Safeguarding Leads	Carers Federation - Carer Services Lead (Head Office) Rosaleen Lynch Mob: 07739 237147 Email: r.lynch@carersfederation.co.uk Carers Federation Operations Manager Philip Kerr Mob: 07738 994059 Email: philipk@carersfederation.co.uk (Each office/service will have a named lead with contact details displayed prominently in each office)

It is imperative that relevant Local Authority Safeguarding Adult pathways are followed when following this policy. The information can be found via the Safeguarding Adults website within each Local Authority area. When engaging with new locality areas relevant hard copies of policies will be requested and stored in the locality office for any staff that do not have access to the internet.

SAFEGUARDING POLICY: ADULTS WITH CARE AND SUPPORT NEEDS (PART 2)

Policy Process/ Procedure

Procedure for recording and reporting allegations or concerns of Abuse

A disclosure of abuse may come directly from a client, or it may be an adult client who informs us about concerns they have for another adult's safety. It may also relate to something you witness that gives rise to concern. In each case, follow the procedure below as closely as possible.

Complete a '**Safeguarding Referral Form**' (Appendix 3) as soon as is practicable after hearing the information or witnessing the incident. This is to be completed even if a decision is taken to not refer.

Discuss the matter with your line manager / Safeguarding Lead or in their absence, the Safeguarding Officer. In most situations your line manager will make any necessary referrals

If any of the above are not available and the adult is in immediate danger, refer yourself. Telephone the Adult Social Care Duty Team and report the allegation or concern.

Appropriate telephone numbers should be available and in a prominent position in your office.

If it is a clear case of a crime having been committed contact your local police station. Record all information briefly, accurately and clearly.

Follow up your telephone conversation to Adult Social Care with a letter, within 24 hours, confirming that you have reported the matter and **request they notify you within 48 hours that they have received the information and are acting on it.**

Log the referral in **red** in the clients file and keep a copy of the concern of abuse statement sheet in the file. Post a photocopy of the '**Safeguarding Referral Form**' to the Safeguarding Officer at Carers Federation HQ, Pelham Road Nottingham.

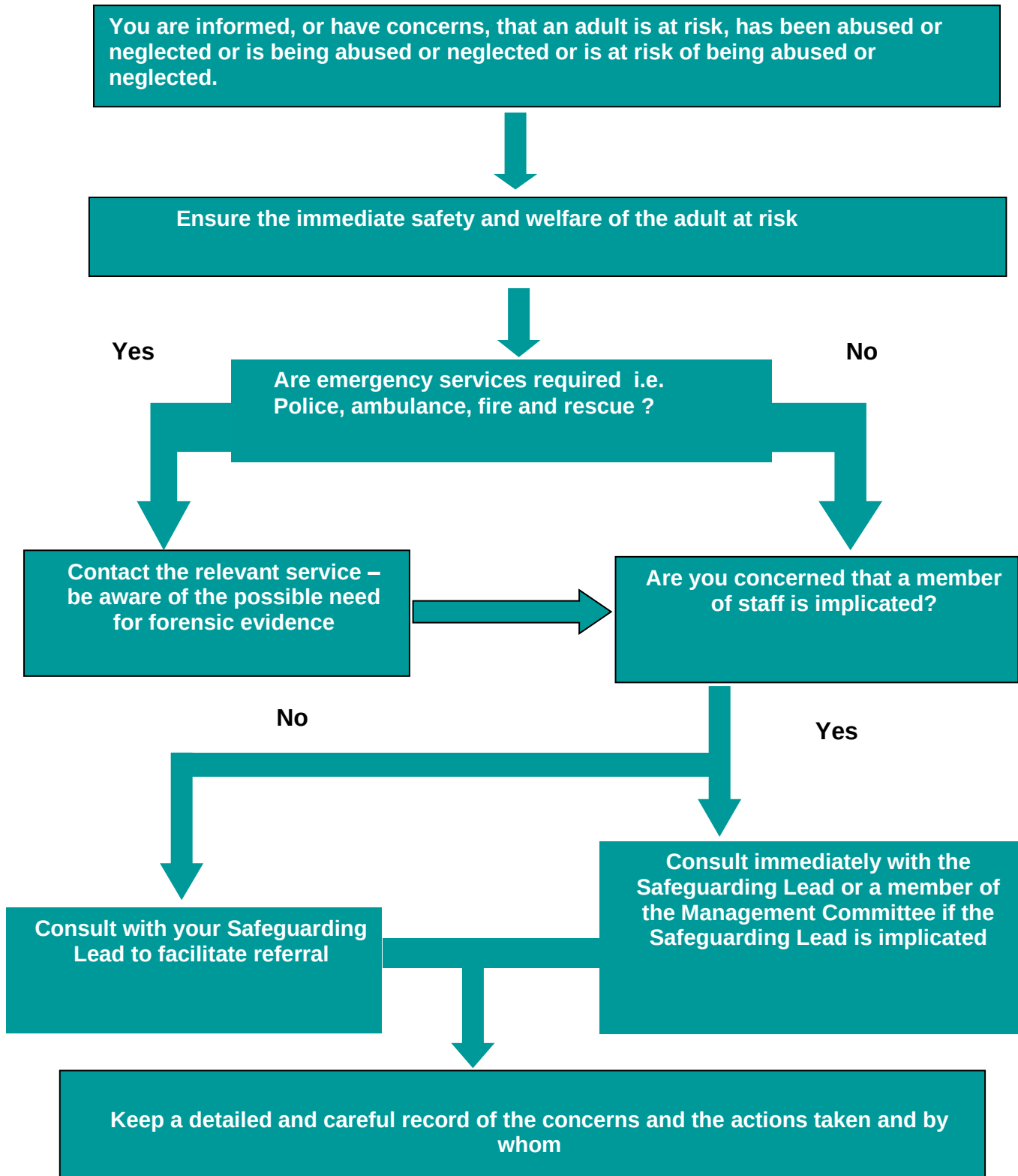
What to do if you suspect a case of abuse against an adult.

If information is passed to you alleging abuse, or you think someone you have met through your work at Carers Federation is being abused, whether by a member of staff, a volunteer or by someone else - do not ignore it.

- Report the issue **without delay** to your Safeguarding Lead or Safeguarding Officer. They will treat what you tell them in confidence.
- They will record your concerns and help decide on what action is needed.
- **Do not pass on your concerns to other people in the Forum or outside without express their permission.** Gossip spreads quickly and is often inaccurate. You may cause harm to the alleged victim or to the accused person who may be innocent. Only those who need to be aware of a situation should be told. Any breach of confidentiality will be a disciplinary offence.

- If the vulnerable adult tells you about a situation that seems to be abusive, reassure him or her that telling you was the right thing to do.
- 'Listen' carefully to what you are being told or make rough notes of what you have witnessed.
- Where appropriate explain that our Adults at Risk policy does not allow us to keep such information confidential
- Complete a '**Safeguarding Referral Form**' as soon as is practicable after hearing the information or witnessing the incident. This is to be completed even if a decision is taken to not refer.
- Discuss the matter with your Safeguarding Lead or in their absence, the Safeguarding Officer. In most situations the Safeguarding Lead will make any necessary referrals
- If any of the above are not available and the adult is in immediate danger, refer yourself. This will usually entail a call to the police or ambulance service.
- Telephone the Adult Social Care Duty Team and report the allegation or concern. Appropriate telephone numbers should be available and in a prominent position in your office. If it is a clear case of a crime having been committed contact your local police station.
- Record all information briefly, accurately and clearly.
- Follow up your telephone conversation to Adult Social Care with a letter, within 24 hours, confirming that you have reported the matter and **request they notify you within 48 hours that they have received the information and are acting on it.**
- Log the referral in **red** in the clients file and keep a copy of the referral form in the file.
- Email a copy of the '**Safeguarding Referral Form**' to the Carers Federation Safeguarding Officer
Don't confront the person alleged abuser.

This flowchart provides a brief overview of the process for raising a concern and should be used in conjunction with the written procedure. You should raise any concern about abuse or neglect immediately if an emergency or otherwise within the same working day.



Appendix 1: Categories of Adult Abuse

Reference: Care and Support Statutory Guidance (2018)

What constitutes abuse and neglect?

This section considers the different types and patterns of abuse and neglect and the different circumstances in which they may take place. This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour which could give rise to a safeguarding concern.

Organisations and individuals should not limit their view of what constitutes abuse or neglect, as they can take many forms and the circumstances of the individual case should always be considered. Exploitation and abuse of power are common themes in the following list of the types of abuse and neglect.

Physical abuse including:

- assault
- hitting
- slapping
- pushing
- misuse of medication
- restraint
- inappropriate physical sanctions

Domestic violence including:

- physical
- psychological
- sexual
- financial
- emotional abuse
- honour-based violence

The cross-government definition of domestic violence and abuse is:

any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

A new offence of coercive and controlling behaviour in intimate and familial relationships was introduced into the Serious Crime Act 2015. The offence will impose a maximum 5 years' imprisonment, a fine or both.

The offence closes a gap in the law around patterns of coercive and controlling behaviour during a relationship between intimate partners, former partners who still live together, or family members, sending a clear message that it is wrong to violate the trust of those closest to you, providing better protection to victims experiencing continuous abuse and allowing for earlier identification, intervention and prevention.

Sexual abuse including:

- rape
- indecent exposure
- sexual harassment
- inappropriate looking or touching
- sexual teasing or innuendo
- sexual photography
- subjection to pornography or witnessing sexual acts
- sexual assault
- sexual acts to which the adult has not consented or was pressured into consenting

Psychological abuse including:

- emotional abuse
- threats of harm or abandonment
- deprivation of contact
- humiliation
- blaming
- controlling
- intimidation
- coercion
- harassment
- verbal abuse
- cyber bullying
- isolation
- unreasonable and unjustified withdrawal of services or supportive networks

Financial or material abuse including:

- theft
- fraud
- internet scamming
- coercion in relation to an adult's financial affairs or arrangements, including in connection with:
 - wills, property, inheritance or financial transactions
 - the misuse or misappropriation of property, possessions or benefits

Financial abuse is the main form of abuse investigated by the Office of the Public Guardian both amongst adults at risk and children. Financial abuse can occur in isolation, but as research has shown, where there are other forms of abuse, there is likely to be financial abuse occurring. Although this is not always the case, everyone should also be aware of this possibility. Potential indicators of financial abuse include:

- lack of heating, clothing or food
- change of living conditions
- inability to pay bills/ unexplained shortage of money
- unexplained withdrawals from an account
- unexplained loss/ misplacement of financial documents
- the recent addition of authorised signers on a client or donor's signature card
- sudden or unexpected changes in a will or other financial documents

Modern slavery encompasses:

- slavery
- human trafficking
- forced labour and domestic servitude.
- traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment

Discriminatory abuse including forms of harassment or slurs because of:

- race
- gender and gender identity
- age
- disability
- sexual orientation
- religion

Organisational abuse

This includes neglect and poor care practice within an institution or specific care setting e.g. a hospital or care home or in relation to care provided in one's own home.

This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice due to the structure, policies, processes and practices within an organisation.

Neglect and acts of omission including:

- ignoring medical, emotional or physical care needs
- failure to provide access to appropriate health, care and support or educational services
- the withholding of the necessities of life, such as medication, adequate nutrition and heating

Self-neglect

This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.

Incidents of abuse may be one-off or multiple and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm. Repeated instances of poor care may be an indication of more serious problems and of what we now describe as organisational abuse. In order to see these patterns, it is important that information is recorded and appropriately shared.

Patterns of abuse vary and include:

- serial abuse, in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse
- long-term abuse, in the context of an ongoing family relationship such as domestic violence between spouses or generations, or persistent psychological abuse
- opportunistic abuse, such as theft occurring because money or jewellery has been left lying around

Note: *This is not an exhaustive list, nor do these examples prove that there is actual abuse occurring. However, they do indicate that a closer look and possible investigation may be needed.*

Appendix 2: Key Principles

Care and Support Statutory Guidance (Re-issued 2018) Key principles when working with Adults at Risk

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.

Appendix 3:

Carers Federation Safeguarding Referral Form

This form should be completed prior to making a referral of a child, young person or adult as a result of Safeguarding concerns. If there is immediate risk of harm, a decision can be made to complete it afterwards. All sections of this form must be completed		
Date		Name of worker
Name of person for whom there are concerns		
Address		
Age	Ethnicity	Disability
Barriers to communication		
Details of concerns		
Add an additional sheet if necessary		
What did the worker say / do in response		
Has the referral been discussed with the parent/carer		YES NO
Has permission been given for the referral		YES NO
Record of conversation with the parent/carer if appropriate		

Name of person making the referral	
Name of Safeguarding lead discussed with	
Details of who referred to:	Service
	Name
	Address
	Tel
	email
Confirmation letter sent?	YES NO
Recorded on file?	YES NO
Details of follow up action	
Signature of worker	
	Date
Signature of Safeguarding Lead	
	Date



SAFEGUARDING CHILDREN POLICY

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- Appendices

SAFEGUARDING POLICY: CHILDREN AND YOUNG PEOPLE

Overarching Policy

Definitions

Children at risk:

A **CHILD AT RISK** is defined as a person under the age of 18yrs (Childrens Act 1989) who is taken to be at risk of suffering harm because of being subject to, or exposed to, one or more of the following events: serious physical, emotional or psychological abuse, sexual abuse, domestic or family violence, and or neglect.

Safeguarding children is defined in working together to safeguard children:

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Purpose and aim of the policy

The purpose of this policy is to ensure that Carers Federation fulfils its responsibility to keep children safe, regardless of their gender, race, religion, ethnicity, any disability, sexual orientation, or gender reassignment.

As an organisation our aim is to safeguard children and young people coming into contact with Carers Federation, from any form of abuse.

It is our intention to inform children, young people and adults using our service, of our safeguarding policy and procedures and how it affects their confidentiality.

Research shows that a significant percentage of children do not disclose abuse immediately, some never disclose and that for children to consider disclosing they require certain conditions.

As an organisation we intend to be aware of the different categories of abuse, to be alert to possible indicators of abuse (see appendix 1), to be able to recognise abuse, to enable children and teenagers to disclose abuse and to respond to disclosures or indicators of abuse appropriately, sensitively, and effectively. These procedures apply to everyone working or volunteering in the organisation. These procedures are informed by the Nottinghamshire Safeguarding Children Partnership and the Nottingham City Safeguarding Children Partnership, and we work within its guidance and will also align to other local Authority areas where services are operated.

This policy applies to anyone working on behalf of Carers Federation, including CEO, senior leads, and the board of trustees, paid staff, volunteers, sessional workers, interns, and students on placement.

1. Introduction

- 1.1 The Carers Federation supports Young Carers, a child identified as having unpaid caring responsibilities for a family member or friend who has an illness or disability such as Physical Disability, Learning Disability, Mental Health Conditions including Alcohol and or Substance misuse. This document is drafted to encourage the promotion of good practice towards Young Carers and children in general. This document can also be read in conjunction with Carers Federation Adults Safeguarding Policy.
- 1.2 For the purpose of this policy document the term “child” will be used to describe all children supported by Carers Federation irrespective of how long or how short a time they are or have been supported by the Carers Federation.
- 1.3 It is fundamental to this Safeguarding policy that the welfare of the child is always regarded as paramount. All children whatever their age, culture, disability gender, language, race, religious belief and/or sexual identity have the right to be Safeguarded from abuse. It is acknowledged that all suspicions and allegations of abuse will be taken seriously and responded to swiftly, appropriately, and professionally. All members of Carers Federation, irrespective of the role being performed, have a responsibility to report all concerns to the appropriate officer.

2. Promoting Good Practice

- 2.1 Child abuse (particularly sexual abuse) can arouse strong emotions in those dealing with such a situation. It is important to recognize these feelings and not to allow them to interfere with judgment and taking appropriate action.
- 2.2 Abuse can occur within many different contexts including the home. It must be recognised that some individuals will actively seek contact with young people to harm them. Carers Federation staff will have regular contact with children and be an important link in identifying cases where children need safeguarding. All cases where poor practice is suspected by a member of staff/volunteer should be referred to the appropriate safeguarding officer.
- 2.3 Every child regardless of age, and in all situations, has a right to feel safe and protected from any situation or practice that results in a child being physically or psychologically damaged. In our organisation, if we have suspicions about a child's physical, sexual, or emotional wellbeing, we will take immediate action.
- 2.4 Where a child has been subjected to abuse, Carers Federation staff must ensure that such a child receives the appropriate level of support.
- 2.5 It is strongly recommended that all Staff and volunteers should endeavor to set an excellent example. This will include avoiding the encouragement of children to smoke or drink or abuse any substance. Carers Federation takes a zero-tolerance approach to the abuse of children.
- 2.6 It is paramount that Carers Federation staff adhere to confidentiality policies, unless there are safeguarding concerns for a child or Young Person, at which point the member of staff would have a responsibility to overturn confidentiality and report a safeguarding concern.

3. Recruitment and Selection of Staff

3.1 We recognize that Safeguarding should not be treated in isolation. We will take on board guidance given by the local Safeguarding Children Board and will address recruitment and selection of volunteers and paid employees by doing the following:

- Accept that it is our responsibility as an organisation to check that all adults with substantial access to children have been appropriately vetted.
- Ensure that every new volunteer or member of staff will complete an application form.
- Request a five-year address history.
- Ask for the names of two referees who will be prepared to provide a written reference.
- Follow up a sample of references with a telephone call or personal contact during which we will discuss the applicant's suitability to work with children. A record of this discussion will be kept in the applicant's file.
- Interview all prospective volunteers and staff.
- Note at interview all previous experience of volunteers and staff in working with children.
- Carry out a probationary period for all volunteers and staff of at least 6 months.
- All relevant staff will be subject to a Full Enhanced Disclosure and Barring check (DBS) through Disclosure and Barring Services. DBS checks will be updated every 3 years as part of Carers Federation good practice and keeping children & young people safe.
- Carers Federation operates in line with safer recruitment. See safer recruitment link
<https://www.gov.uk/government/publications/safeguarding-children-and-safer-recruitment-in-education>

4. Induction and Training

4.1 All staff and volunteers will be required to develop a range of safeguarding competencies appropriate with their role in the organization. We will do this by:

- Assessing and reviewing an individual's level of understanding and confidence in following safeguarding procedures and developing bespoke induction and training programs to improve competence.
- Accessing accredited safeguarding training (regularly updated every 3 years)
- Providing regular formal case reviews, supervisions, and appraisals
- Identifying other relevant safeguarding related training and ensuring staff working with Children & Young People access this as part of their personal development.
- Including safeguarding as an agenda item in team meetings and reviewing decision making through group discussions and file reviews

5. Proactive role of the Carers Federation

5.1 The Carers Federation will appoint a member of the Senior Management Team as nominated Children's Safeguarding Officer. It will be that person's responsibility to review and implement the policy set out in this document.

- 5.2 Each service, or office, will have a person with designated Child Safeguarding responsibilities. This should usually be the service manager or team leader and will be a named Child Safeguarding Lead.
- 5.3 If a complaint is received about poor practice, the Child Safeguarding Lead will deal with that matter as a misconduct issue. If the allegation relates to the Child Safeguarding Lead themselves, it should be reported to the Child Safeguarding Officer who would decide how to deal with the allegation and whether to initiate disciplinary proceedings.

(Refer to Carers Federation Policy on “Managing allegations of abuse against a person who works with children and young people” for further information).

Carers Federation Children’s Safeguarding Officer or appropriate Safeguarding Lead may also liaise with the Local Authority Designated Officer (LADO).

- 5.4 If there are concerns about suspected abuse of any child, that suspicion must be referred immediately to a Child Safeguarding Lead who will take such steps as considered necessary to ensure the safety of that child and any other child who may be at risk.
- 5.5 The Child Safeguarding Lead will support the member of staff to refer the allegation to the Children’s Social Care department without delay.
- 5.6 All concerns referred to the Child Safeguarding lead shall be dealt with in the utmost confidence. Information shall be shared in accordance with the 7 golden rules of information sharing (see below) and shall ensure that information sharing is not a barrier to safeguarding children. Clear boundaries around information sharing or disclosures are important to maintain confidentiality where appropriate.
1. GDPR Isn’t a Barrier to Sharing Information
 2. Be Open and Honest
 3. Seek Advice
 4. Share With Consent Where Appropriate
 5. Consider Safety and Wellbeing
 6. Necessary, Proportionate, Relevant, Accurate, Timely and Secure
 7. Keep a Record

Link to the seven golden rules for information sharing, including a useful flowchart of key questions:

<https://blog.insidegovernment.co.uk/schools/information-sharing-the-seven-golden-rules-to-follow#:~:text=Necessary%2C%20Proportionate%2C%20Relevant%2C%20Adequate%2C%20Accurate%2C%20Timely%20and%20Secure>

Government document link for information sharing:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf

6 **Role of Child Safeguarding Lead**

- 6.1 Support staff members in establishing contact with senior members of Children's Social Care staff responsible for Child Safeguarding in the Federations catchment area.
- 6.2 Both safeguarding officer and lead to ensure that the Federation's Child Safeguarding policy and procedures are followed and particularly, to inform Children's Social Care of relevant concerns about individual children.
- 6.3 Ensure that appropriate information is available at the time of any referral and that written records are kept.
- 6.4 Liaise with Children's Social Care, Carers Federation Child Safeguarding Officer and other agencies as appropriate
- 6.5 Keep the Child Safeguarding Officer informed of any action taken and any further action required.
- 6.6 Ensure that an individual case record is maintained of the action taken by the Child Safeguarding Lead, what liaison there has been with other agencies and the outcome.
- 6.7 Ensure that the Child Safeguarding Officer is made aware of Child Safeguarding training needs within Carers Federation.
- 6.8 The Child Safeguarding Officer will provide up to date information, training and advice. on Child Safeguarding within Carers Federation.
- 6.9 Ensure any staff member involved with safeguarding disclosures are fully supported through the process.

Designated Safeguarding Officers within Carers Federation

Safeguarding Officer & SMT approval of policy: Signed:  December 2023	Carers Federation CEO Jayne Bell Mob: 07525 237735 Email: j.bell@carersfederation.co.uk
Safeguarding Leads	Carers Federation- Carer Service Lead (Head Office) Rosaleen Lynch Mob: 07739 237147 Email: r.lynch@carersfederation.co.uk Carers Federation Operations Manager Phil Kerr Mob: 07738 994059 Email: philipk@carersfederation.co.uk

7 Staff responsibilities

7.1 **All staff must** read and make themselves familiar with the following Carers Federation Safeguarding Policy and associated documents:

- **Allegations of abuse against someone working with children and/or young people policy**
- **E-Safety policy**
- **GDPR policy**
- **Adult Safeguarding policy**
- **Activities policy for Children**
- **Whistle Blowing Policy**

7.2 **All Managers/Safeguarding leads** must adhere to the following:

- Read and familiarize themselves with the Carers Federation Policy for The Recruitment of Ex-Offenders.
- Ensure all Carers Federation Childrens safeguarding policies are upto date in line with Local and National safeguarding guidelines and processes.
- Policies relating to allegations of abuse against someone working with children and Young People
- All staff involved in the recruitment of staff to work with children have received training as part of the 'safer recruitment training' programme.
- Keep themselves informed of developments in Safeguarding through regular review of Local Safeguarding Board guidance:
<https://www.proceduresonline.com/nottinghamshire/scb>
- If working outside of Nottingham/Nottinghamshire Carers Federation staff must familiarise themselves with the local safeguarding board (LSCB) in that particular area.
- There are arrangements in place to cover any out-of-hours activity. Staff working out of hours will be provided with nominated safeguarding lead contact details by management, who will be able to provide support and guidance.

7 Records

7.1 All staff and volunteers must keep written/electronic records of concerns about a child/ren even where there is no need to refer the matter immediately to the Child Safeguarding Lead. All records kept should be stored in locked locations.

7.2 No matter what happens to any suspicion, or allegation of abuse, all details must be recorded by the member of staff involved. Important information to record includes: -

- The date, time and place of disclosure, suspicion, allegation, or actual abuse incident.**
- Details given to staff about the above to include date and time of when incidents occurred.**
- An indication of the parties involved or potentially involved, including names, relationship to Child or Young Person.**

- (iv) **Details of what action the staff member has taken.**
- (v) **Details of reporting i.e., to whom and when.**
- (vi) **These notes must be signed off by the Child Safeguarding Lead and a copy signed by the Child Safeguarding Officer**

7.3 All information stored will be in line with Carers Federation GDPR policy.

7.4 Carers Federation Senior Management team review retention of personal data processes on a regular basis in line with local and national legislation and best practice.

8 Legal and Procedural Framework

8.1 The practices and procedures within this policy document are based on the principles contained within UK and international legislation and government guidance in particular:

- The Children Act 1989
- The Safeguarding of Children Act 1999
- Working together to Safeguard Children 2018
- Caring for the Young and Vulnerable: Home Office guidance for preventing the abuse of Trust 1999
- Criminal Justice and Court Services Act 2000
- The UN Convention on the right of the child
- The Human Rights Act 1998
- The Data protection Act 2018

9. Review of Policy

9.1 Child Safeguarding policies should be reviewed every 12 months or earlier whenever there is any major change in the organisation or in relevant legislation.

9.2 In addition, all Carers Federation staff working directly with Children should make themselves aware of the following local Safeguarding Children Board guidance provided at:

<https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/nottingham-city-safeguarding-children-board/inter-agency-procedures-and-practice-guidance/>

Safeguarding Childrens Policy: (part 2)

PROCEDURE FOR RECORDING AND REPORTING ALLEGATIONS OR CONCERNS OF CHILD ABUSE

A disclosure of abuse may come directly from a child, or it may be an adult client who informs us about concerns they have for a child's safety. When reporting and recording allegations think about the 5 R's:

- Recognise
 - Respond
 - Report
 - Record
 - Refer
1. 'Listen' carefully to what you are being told.
 2. Explain that our Safeguarding policy does not allow us to keep such information confidential.
 3. Complete a 'Concern of Abuse Statement Sheet' as soon as is practicable after hearing the information.
 - **Refer to Appendix 2** for a copy of Safeguarding concerns form
 - **Refer to Appendix 3** for process of referring into Children and Families, click on the link below to download a copy of the Multi Agency Referral form **MARF**
<https://www.nottinghamcity.gov.uk/earlyyears/safeguarding/multi-agency-request-form/>
 - **Addendum can be added to this policy containing all relevant contact details when operating services in other locality areas**
 4. Discuss the matter with your local Safeguarding Lead. In their absence another Federation Safeguarding Lead, the Safeguarding Officer, or the Chief Executive (CEO) should be consulted. In most situations the Safeguarding Lead should help make the decision to make any necessary referrals
 5. If any of the above is not available and the child is in immediate danger, follow point 6, should you not get hold of social care in a timely manner that would further impact the safeguarding situation you **Must** contact emergency services on 999 and request to speak with the Police.
 6. Telephone Children's Social Care Duty Team and report the allegation or concern. If it is unsafe to take the child home, stress that immediate action must be taken. If they fail to respond call the police for assistance.
 7. If out of hours refer to the relevant Emergency Duty Team or Police station
 8. Record the information briefly, accurately, and clearly.

9. Follow up your telephone conversation to Children's Social Care with a letter within 24 hours confirming that you have reported the matter and **request they notify you within 48 hours that they have received the information and are acting on it.**
10. Log the referral in **red** in the child's file as well as logging the information on the Carers Federation electronic database under safeguarding (this will automatically be written in red).
11. Save a copy the Safeguarding concerns form and a copy of the Multi Agency Referral form (MARF) in the Child's file and ensure a photocopy of BOTH forms are sent to the Safeguarding lead and Officer.
12. If it is appropriate the Safeguarding Lead should speak to the child/young person's parent/carer, unless disclosing to the family would put the child in danger.

Do not assume that the parent/carer or family members/friends are not involved in or party to the abuse in some way. Think about Disguised compliance safeguarding. Disguised compliance involves parents and carers appearing to co-operate with professionals to allay concerns and stop professional engagement (Reder et al, 1993)¹. This can mean that social workers and other practitioners may be unaware of what is happening in a child's life and the risks they face may be unknown to local authorities.

<https://www.nottinghamcity.gov.uk/media/3374858/disguised-compliance.pdf>

13. Where Carers Federation services work with clients in venues belonging to statutory services (schools, GP surgeries etc.). If we receive a disclosure on such premises, it is still the Carers Federation responsibility to refer and follow the procedure set out above. It is a matter of courtesy however that the Carers Federation Safeguarding Lead inform the Safeguarding officer of the other service that a referral has been made.

Listening to a child

- Never trivialise or exaggerate child abuse issues.
- Acknowledge barriers to communication e.g., non-verbal children or children who communicate in another language or format.
- Allow the child time to speak and not interrupt nor make suggestions to them which could imply making an investigation.
- Do not interrogate or question other than to clarify your understanding. If the matter is to be investigated further, it will be so done by trained professionals. No matter how well you know the child, spare them having to repeat themselves over and over. Apart from anything else, the child may begin to think that you don't believe them.
- Be honest, tell the child that you cannot keep it to yourself, you must talk to someone else that can help:(If necessary, refer back to Carers Federation contract between Child, Young Person, parents/Carer and Carers Federation, this contract explains our commitment to safeguarding and confidentiality and when we would have to breach confidentiality)

- Remain calm, no matter how difficult it is to listen to the child, think of how hard it must be to say it. Some things are very difficult to talk about, you've been chosen because the child feels they can talk to you. If you show anger, disgust, disbelief then the child may stop talking for fear of upsetting you further or feel that your negative feelings are being directed towards them.
- Listen to the child – REALLY LISTEN – take what they say seriously. Reassure them that they've done the right thing by telling you.
- As soon as practical write down everything the child told you, what you have said in response to it on a Statement Sheet and discuss this with your manager.
- A child may not disclose to you that they are being abused. You may notice non-accidental injuries or other signs.
- If you become aware or suspicious that a child may be subjected to some form of abuse refer to the section "procedure for reporting and recording allegations or concerns of children"

APPENDICES

APPENDIX 1

Categories of Child Abuse

Physical abuse:

May involve:

- Hitting
- Shaking
- Throwing
- Poisoning
- Burning or scalding
- Drowning, Suffocating, or otherwise causing physical harm to a child
- Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child

Indicators of Physical abuse:

Children with:

- frequent injuries
- unexplained or unusual fractures or broken bones; and
- unexplained: - bruises or cuts; - bruising in non-mobile babies; - burns or scalds; or - bite marks

Emotional abuse:

- Is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development?
- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Imposing age or developmentally inappropriate expectations on children; • Seeing or hearing the ill-treatment of another e.g., where there is domestic abuse
- Serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger; • Exploiting and corrupting children

Indicators of Emotional abuse:

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder'
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons

Sexual abuse:

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve:

- physical contact, including assault by penetration (for example, rape or oral sex)

- non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.
- non-contact activities, such as involving children in looking at, or in the production of, sexual images

Indicator of Sexual abuse:

Children who:

- display knowledge or interest in sexual acts inappropriate to their age
- use sexual language or have sexual knowledge that you wouldn't expect them to have
- ask others to behave sexually or play sexual games
- have physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy

Neglect

Is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse.

Indicators of Neglect:

Children who

- are living in a home that is indisputably dirty or unsafe
- are left hungry or dirty
- are left without adequate clothing, e.g., not having a winter coat
- are living in dangerous conditions, i.e., around drugs, alcohol or violence
- are often angry, aggressive or self-harm
- fail to receive basic health care
- parents who fail to seek medical treatment when their children are ill or are injured

Sexual Exploitation:

which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through using technology.

Other:

Bullying, racism, and other types of discrimination are also forms of child abuse. Like other kinds of abuse, they can harm a child physically and emotionally.

Further types of abuse are as follows:

- Criminal Exploitation and Gangs
- Bullying and Cyber Bullying
- Female Genital Mutilation (FGM)
- Child Sexual Exploitation (CSE)
- Child Trafficking
- Domestic Abuse

You may find that when a Child or Young Person discloses a safeguarding that this could potentially include one or more of the above or other forms of abuse.

See the following link for information on various types of abuse in Children and Young People
<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

Use this link to access a more detailed guidance
<https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/nottingham-city-safeguarding-children-board/inter-agency-procedures-and-practice-guidance/>

This procedure may differ in different Counties therefore should you have a safeguarding concern you must follow the local area safeguarding board policies alongside national safeguarding guidelines.

APPENDIX 2

Safeguarding Concerns Form

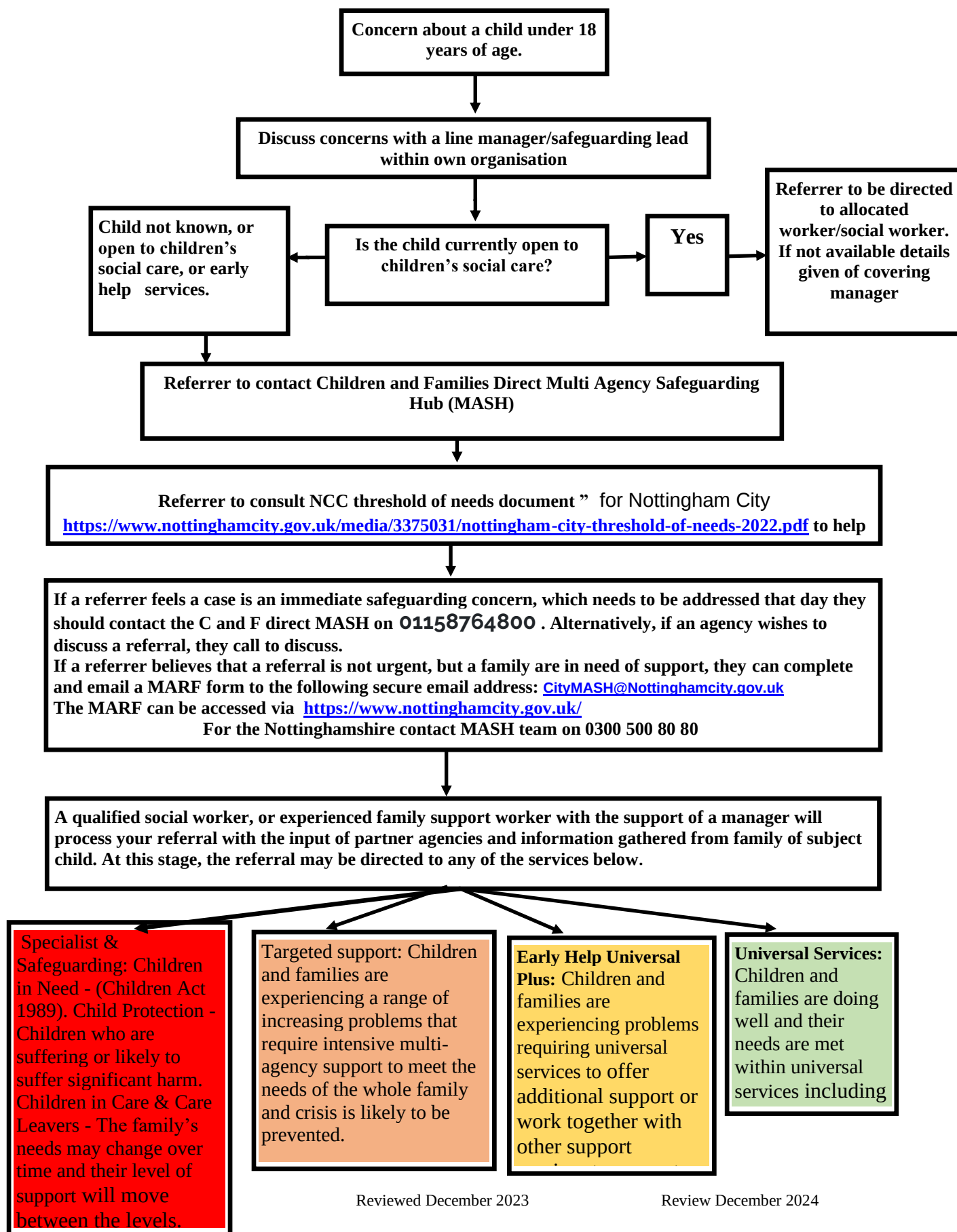
This form should be completed prior to making a referral of a child, young person or adult as a result of Safeguarding concerns. If there is immediate risk of harm, a decision can be made to complete it afterwards. All sections of this form must be completed

Date	Name of worker	
Name of person for whom there are concerns		
Address		
Age	Ethnicity	Disability
Barriers to communication		
Details of concerns:		
Add an additional sheet if necessary		
What did the worker say / do in response?		

Has the referral been discussed with the parent/carer	YES	NO
Has permission been given for the referral	YES	NO
Record of conversation with the parent/carer if appropriate		
Name of person making the referral		
Name of Safeguarding lead discussed with		
Details of who referred to:	Service	
	Name	
	Address	
	Tel	
	email	
Confirmation letter sent?	YES	NO
Recorded on file?	YES	NO
Details of follow up action		
Signature of worker		Date
Signature of Safeguarding Lead		Date

APPENDIX 3

Referral Process chart into Nottingham City and Nottinghamshire Children Services Multi Agency Safeguarding Hub (MASH)



Working Together to Safeguard Children 2018

www.gov.uk/government/publications/working-together-to-safeguard-children--2

- Working Together to Safeguard Children 2018
- Working Together self-directed learning session

Below are some guidance templates:

In addition to the joint NCSCB / NSCB Practice Guidance that can be accessed above, there is some Practice Guidance which is for Nottingham City only:

- Discharge Planning Meeting Guidelines
- Discharge Planning Meeting Template
- Bruising in babies - practical guidance 2016
- Practice Guidance for Multi Agency Meetings
- SHARP - school self-harm guidance
- Children Who Have a Family Member in Prison Briefing Note
- NCSCB Mobile Children and Families Policy
- Neglect Practice Guidance
- Special Guardianship Orders
- Knife Crime Guidance for Primary and Secondary Schools 2019
- Honour Based Violence, forced Marriage and Female Genital Mutilation Guidance 2022
- Safeguarding Children and Young People from Child Sexual Exploitation

The following Child Sexual Exploitation (CSE) Procedural Flowchart and Multi-Agency Risk Assessment Tool have been developed to support practitioners in their work to protect children at risk of experiencing Child Sexual Exploitation (CSE)

Click on link to download the following:

<https://www.nottinghamcity.gov.uk/media/3374881/multi-agency-risk-assessment-tool-for-city-county-20161026-final.docx>

- [CCE Pathway](#)
- [CCE Toolkit](#)
- [CCE Toolkit Guidance](#)
- [CCE Summary](#)
- [Appropriate Language Guide](#)
- [County Lines Guidance](#)
- [It was hard to escape...](#)

Appropriate Language Guidance:

Appropriate Language is paramount to supporting Children and young People who may have or are experiences CSE. Language implying that the child or young person is complicit in any way, or responsible for the crimes that have happened or may happen to them, must be avoided. The guidance provides lots of suggestions on how to express concerns and describe what the child or young person is experiencing that avoid any suggestion that the child is to blame.

Guidance has been developed to help professionals to use appropriate language when communicating about children and young who are experiencing child sexual exploitation or criminal exploitation.

https://www.childrenssociety.org.uk/sites/default/files/2022-01/Child_Exploitation%20Appropriate_Language_Guide%202022.pdf

Additional useful Links/Resources relating to Safeguarding Children and Young People

<https://www.local.gov.uk/sites/default/files/documents/no-wrong-doors-working-to-27d.pdf>

<https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/child-abuse-prevention/>

<https://www.nottinghamcity.gov.uk/media/3374834/indicators-of-child-abuse.pdf>

<https://www.nspcc.org.uk/>

<https://www.gov.uk/government/publications/serious-case-reviews-analysis-lessons-and-challenges>

<https://hubofhope.co.uk/>



Social Media Policy

Introduction

Whether or not an employee chooses to create or participate in a blog, wiki, online social network such as Facebook, Instagram and Twitter or any other form of online publishing or discussion is their own decision. However, Carers Federation recognises that emerging online collaboration platforms are fundamentally changing the way individuals and organisations communicate, and this policy is designed to offer practical guidance for responsible, constructive communications via social media channels for employees.

The same principles and guidelines that apply to the activities of employees in general, as found in the Carers Federation Code of Conduct Policy, apply to employee activities in social media channels and any other form of online publishing.

Our organisation fully respects the legal rights of our employees, including their rights to engage in concerted and protected activities, and any part of this policy which interferes with the legal rights of our employees will not be enforced. In general, what you do on your own time is your affair. However, activities in or outside of work that affect your job performance, the performance of others, or Carers Federation business interests are a proper focus for company policy.

B. Definitions

1. Social Media Channels - Blogs, micro-blogs, wikis, social networks, social bookmarking services, user rating services and any other online collaboration, sharing or publishing platform, whether accessed through the web, a mobile device,

text messaging, email or any other existing or emerging communications platform.

2. Social Media Account – A personalised presence inside a social networking channel, initiated at will by an individual. YouTube, Twitter, Instagram, Facebook and other social networking channels allow users to sign-up for their own social media account, which they can use to collaborate, interact and share content and status updates. When a user communicates through a social media account, their disclosures are attributed to their User Profile.

3. Social Media Disclosures - Blog posts, blog comments, status updates, text messages, posts via email, images, audio recordings, video recordings or any other information made available through a social media channel. Social media disclosures are the actual communications a user distributes through a social media channel, usually by means of their social media account.

4. External vs. Internal Social Media Channels – External social media channels are social media services that do not reside at a domain. Internal social media channels are located at a company- owned domain, require a password to access and are only visible to employees and other approved individuals c.f Carers Federation Intranet.

5. User Profile – Social Media Account holders customize their User Profile within a Social Media Channel with specific information about themselves which can be made available to other users.

6. Copyrights – Copyrights protect the right of an author to control the reproduction and use of any creative expression that has been fixed in tangible form, such as literary works, graphical works, photographic works, audiovisual works, electronic works and musical works. It is illegal to reproduce and use copyrighted material through social media channels without the permission of the copyright owner.

7. Hosted Content – Text, pictures, audio, video or other information in digital form that is uploaded and resides in the social media account of the author of a social media disclosure. If you download content from the Internet, and then upload it to your social media account, you are hosting that content. This distinction is important because it is generally illegal to host copyrighted content publicly on the Internet without first obtaining the permission of the copyright owner.

8. Embed Codes – Unique codes that are provided to entice others to share online

content without requiring the sharer to host that content. By means of an embed code, it is possible to display a YouTube user's video in someone else's social media account without requiring that person to host the source video file. This distinction is important because embed codes are often used by copyright owners to encourage others to share their content via social media channels.

9. Controversial Issues – Issues that form the basis of heated debate, often identified in political campaigns as wedge issues, since they provoke a strong emotional response. Examples include political views, health care reform, gun control and abortion. Religious beliefs may also be controversial, particularly to those intolerant of beliefs different from their own.

10. Official Content – Publicly available online content created and made public by our company, verified by virtue of the fact that it is accessible through our corporate website.

11. Inbound Links – An inbound link is a hyperlink that transits from one domain to another. A hyperlink that transits from an external domain to your own domain is referred to as inbound link. Inbound links are important because they play a role in how search engines rank pages and domains in search results.

12. Link Bartering Exchanges – Trading or purchasing inbound links from other domains exclusively for the purposes of lifting your domain in search engine page results.

13. Tweets and Retweets – A tweet is a 140 character social media disclosure distributed on the Twitter micro-blogging service. Retweets are tweets from one Twitter user that are redistributed by another Twitter user. Retweets are how information propagates on Twitter.

C. Objectives

1. Our aim is to establish practical, reasonable and enforceable guidelines by which Carers Federation employees can conduct responsible, constructive social media engagement in both official and unofficial capacities.

2. Carers Federation wishes to promote a safe environment for employees to share subject matter expertise that is not proprietary and earn management's recognition

for the outstanding use of social media for business.

3. Prepare our company and employees to utilize social media channels to help each other and the communities we serve, particularly in the event of a crisis, disaster or emergency.

4. Protect our company and employees from violating National or Local rules, regulations or laws through social media channels.

D. Guiding Principles

1. Carers Federation trusts and expects employees to exercise personal responsibility whenever they use social media, which includes not violating the trust of those with whom they are engaging. Employees should never use social media for covert advocacy, marketing or public relations. If and when employees use social media to communicate on behalf of Carers Federation, they should clearly identify themselves as employees.
2. Only those officially designated can use social media to speak on behalf of our company in an official capacity, though employees may use social media to speak for themselves individually or to exercise their legal rights under freedom of speech principles.
3. When you see misrepresentations made about Carers Federation by media analysts, bloggers or other social media users, you may certainly use your blog, social networking account, or someone else's to point that out. But you may only do so in an official capacity if you follow the terms of this policy and have cross checked with a senior manager..
4. Different social media channels have proper and improper business uses. For example, members of social networks are expected to read, and when appropriate respond, to questions asked of them from another member of their social network. It is important for employees to understand what is recommended, expected and required when they discuss or -related topics, whether at work or on their own time.
5. Employees are responsible for ensuring that all contractors, vendors and agencies that the company has a formal relationship with have received and

agreed to abide by these guidelines in writing.

6. Employees are responsible for making sure that their online activities do not interfere with their ability to fulfill their job requirements or their commitments to their managers, co-workers or customers.

E. Disclosure and Transparency

1. Since reputations are built on trust, employees are strongly requested to disclose their identity and affiliation to our organization whenever discussing company or company -related topics via social media.

a. Be aware of your relationship to our organization in all social media disclosures. Nothing gains more notice in social media channels than honesty -- or dishonesty. If you have a vested interest in something you are discussing, be the first to acknowledge that relationship and point it out, so long as you can do so without forfeiting your legal rights to engage in concerted or protected activities related to your employment.

b. Comply with all laws and regulations regarding disclosure of your identity.

c. Our organization believes in transparency and honesty. Employees are encouraged to use their real name and identify that they work for in any social media disclosure that involves company or company -related topics. The use of pseudonyms and aliases are strongly discouraged.

d. Never represent yourself to be anyone other than who you really are.

e. Be consistent on all the profile pages of your social media accounts. Conflicting information damages your credibility and could also adversely impact 'Carers Federations reputation. New employees who intend to use social media to discuss our organization or organization -related topics are encouraged to update their profile pages to reflect these guidelines.

f. Employees are responsible for making sure that any agencies, contractors or vendors they are managing disclose their relationship with our organization in their social media disclosures. Agency personnel, contractors and vendors are prohibited from representing themselves as employees.

2. Whenever commenting on company or company -related topics via social media channels, employees are requested to:

a. Use a method of disclosure that makes it easy for the average reader to understand their position, avoid jargon or ambiguous language and always provide a functional means by which you can be contacted in a timely manner based on the nature of your social media disclosure. Misinformation has the potential to spread quickly online and it is our intention to limit the use of technical or ambiguous language that could be misinterpreted by others. The failure to reply to legitimate questions which arise from comments made by company employees in social media channels, particularly by employees who instigated a conversation, could also result in negative impressions of our company, products or services. Employees who choose to engage in social media channels about our company or company-related topics are required to monitor their feedback and use their best judgment to respond appropriately when warranted.

b. Employees may only mention our organization's official corporate policies in their social media disclosures when those policies are publicly available on the Internet, and may only do so if they include a link to that policy in their disclosure.

c. If an employee chooses to share an opinion on company policy, they may do so only if they precede their social media disclosure with a disclaimer acknowledging that their personal opinion does not necessarily reflect the opinion of their employer. (See section K. Disclaimers)

3. When engaging in discussion with others on company or company -related topics via social media channels, employees should:

a. Disclose their relationship to our organization and ask those they are engaging with to disclose their relationships and affiliations as well.

b. Never ask someone else to make anonymous social media disclosures.

c. Never use their relationship to our organization exclusively for personal gain.

d. Never use services or technologies for bulk-posting social media disclosures. Bulk posting of comments to blogs and social networking services is an unethical practice known as comment spam, is disrespectful of our community's attention and strictly

prohibited.

e. Employees are discouraged from engaging directly with minors via social media channels, and must always use extreme care if creating content intended to be consumed by minors.

4. When engaging external agencies, contractor or vendors, employees should:

a. Ask agencies, contractors and vendors to acknowledge their contractor relationship within all their social media disclosures.

b. Publicly acknowledge when agencies, contractors or vendors fail to comply with these policies, and if necessary, take immediate corrective action.

c. Require agencies, contractors and vendors to enforce these requirements on their subcontractors as well.

d. Always discuss and secure formal agreement to these social media policies before entering into a business relationship with an agency, contractor or vendor.

e. Distribute this social media policy to all agencies, contractors and vendors whose business relationship predates this policy and secure their formal agreement to abide by these guidelines.

5. Compensation and Incentives

a. Never pay bloggers or anyone else outside the organization to write endorsements of our company, product or services, or to create fake social media disclosures. Paying or compensating bloggers to generate endorsements without disclosing compensation is considered unethical by our company ..

b. Distributions of items, compensation or incentives worth more than £10 each should include a clear request that as a condition of acceptance, the recipient shall mention the terms and conditions by which they received the item, compensation or incentive in any social media disclosures they may choose to release.

c. Never purchase inbound links, never participate in link bartering exchanges and never use the promise of inbound links to try and convince individuals to create positive social media disclosures about or on behalf of our company.

F. Respectfulness

1. Employees should always be respectful of every individual's legal right to express their opinions, whether those opinions are complimentary or critical. Our company recognizes and appreciates the rights of individuals to free speech. By respectfulness, we mean tolerance and consideration for the opinions and positions of others, whether they are in alignment or conflict with your own.

2. Whether officially authorized to speak on behalf of the company or not, employees may be seen by people outside of our company as representatives of our brand. Employees are encouraged to represent the core values of our organization as described in the Code of Conduct and our mission statements, whenever they make social media disclosures about our organization or organization-related topics.

3. Employees should always strive to add value to online conversations by advancing the dialogue in a constructive, meaningful way. By adding value, employees can effectively demonstrate respectfulness to those they engage via social media channels.

4. Harassment, threats, intimidation, ethnic slurs, personal insults, obscenity, racial or religious intolerance and any other form of behavior prohibited in the workplace is also prohibited via social media channels and will be dealt with through Carers Federation Disciplinary Procedure.

5. Employees who choose to make social media disclosures about topics relevant to our organization should always be aware that their disclosures are not private or temporary. Social media disclosures live online indefinitely, and employees should remember that they will be visible to a broad audience and possible even read out of context.

6. Always show proper consideration when discussing religion, politics or any other controversial issues that may provoke a charged, emotional response by demonstrating tolerance and patience and always strive to show compassion for alternate points of view.

G. Personal Privacy

1. Employees have a right to their personal privacy. They have the right to keep their personal opinions, beliefs, thoughts and emotions private. Employees are prohibited from sharing anything via social media channels that could violate another employee's right to personal privacy.

2. Examples of social media disclosures that may compromise an employee's right to

privacy include, but are not limited to, pictures, video or audio recorded and shared through social media channels without the permission of any single employee featured, the public disclosure of private facts or the disclosure of information gained through unreasonable intrusion.

H. Trade Secrets

1. Effectively managing and protecting Carers Federation's trade secrets is a critical responsibility of all employees. Trade secrets are an asset, whether we work in the field or the office. Failure to manage and protect confidential information correctly may result in legal or regulatory fines, damages to Carers Federation's reputation and lost productivity.
2. Externally, employees are restricted from referencing customers, partners or suppliers by name, or the confidential details of their projects, in their social media disclosures without first obtaining the permission of the individual or organization that the employee wishes to reference.
3. Social media channels are not the place to conduct confidential business with co-workers, customers, partners or suppliers.
4. External social media channels should not be used for internal business communications among fellow employees. It is fine for employees to disagree, but please don't use your external blog or other online social media channels to air your differences publicly.
5. Think carefully before you make any social media disclosures. **Always consult and involve a colleague if any doubt exists as to whether a social media disclosure is appropriate.** What you publish online may be available to a broad audience for a very, very long time. When in doubt, leave it out.

I. Security

1. The use of cameras or other visual recording devices is prohibited at company premises, unless approved in advance by service managers.
2. The creation of text messages, text notes, text descriptions, emails, photographs, sketches, pictures, drawing, maps or graphical representations or explanations of premises is prohibited without first obtaining permission from a Service Manager.

3. Whether internal or external, social media communications are never private. Sharing of any information via social media channels should never compromise the security of any facility or complex.

J. Diplomacy

1. Internal social computing platforms permit a broad audience to participate, so be sensitive to who will see your social media disclosures. If someone hasn't given explicit permission for their name to be used, think carefully about how your social media disclosure could impact intangibles such as morale or productivity. Again, when in doubt, leave it out.

2. Don't try to settle scores or goad competitors or others into inflammatory debates. Here and in other areas of public discussion, cooperate and acknowledge that everyone is important. Never assume superiority. Always be humble. And be open to compromise, particularly when the cost of conflict outweighs the cost of losing ground.

3. For reasons of diplomacy, employees are discouraged from releasing external social media disclosures about competitors. If however, a employee chooses to release a social media disclosure or to engage in an online discussion with or about a competitor, any facts cited in their disclosure must be readily verifiable by means of a link to a reliable, neutral source with a reputation for fact checking and accuracy.

K. Disclaimers

1. In order to protect our brand, Carers Federation wants to make it as easy as possible for others to be able to distinguish social media disclosures issued in an official capacity by management from those issued by employees who are not our official corporate spokespeople. But we also don't want to burden employees or in any way take away their rights under freedom of expression. To help others distinguish between social media disclosures from management from those from employees, we ask that only those authorized to speak on behalf of our organization in an official capacity do so via social media channels without including a disclaimer.

2. Employees who are not authorized to speak on behalf of our company in an official capacity may share their opinions or thoughts about our company and

company -related topics via social media channels as long as they include a disclaimer clearly acknowledging that their personal opinions do not reflect the opinions of our company. Disclaimers do not need to be in the actual social media disclosure itself. Social media disclaimers can be stated once -- preferable in the biography or about field -- on the profile page of the social media account holder. Here are two sample social media disclaimers:

a. "I work for and this is my personal opinion."

b. "I am not an official spokesperson, but my personal opinion is..."

3. If employees choose to use social media channels to distribute links to official content, they are not required to disclaim their relationship, so long as they have clearly acknowledged their relationship to our organization on the profile page of the social media account or channel used to distribute the link, and preferably any other social media channels they may use to redistribute or syndicate their social media disclosures.

4. Any employee who chooses to use social media to publish content or engage in online conversations in an unofficial capacity without referencing links to official content are requested to feature the following disclaimer prominently on the profile page of the social media channel used to distribute the disclosure, and the profile pages on any social media channels they use to redistribute and/or syndicate those disclosures. At a minimum, the following standard disclaimer should be used: **"The postings on this site are my own and don't necessarily represent our Carers Federation's positions, strategies or opinions."**

5. This standard disclaimer does not by itself exempt employees from a special responsibility when making social media disclosures. By virtue of their position, they must consider whether the personal thoughts they publish may be misunderstood. And a manager should assume that his or her team will read what is written. Public social media channels are not the place for managers to enforce corporate policy or reprimand employees.

6. Social media disclosures which do not mention our organization or organization-related topics do not need to include a disclaimer.

L. Legal Matters

1. For your protection, and the protection of our organization, employees using social media channels are expected to do so without infringing on the copyrights of others. Employees are prohibited from engaging in any activities via social media channels that interferes with the copyrights of others.

2. For your protection, and the protection of our organization, employees are prohibited from using internal or external social media channels to publicly criticize or complain about the behavior or actions of a customer.

3. For your protection, and the protection of our organization, employees are prohibited from using internal or external social media channels to discuss trade secrets, legal matters, litigation or our financial performance. When asked by others to discuss any of these matters, employees should relay that “our social media policy only allows authorized employees to discuss these types of matters, but I can refer you to someone on our external communications team if you’d like to ask them,” and refer the question to an appropriate Service Manager.

5. In some circumstances, it may be permissible to share an excerpt from a copyrighted work in a social media disclosure, so long as that copyrighted work is publicly available on the internet. These guidelines apply to sharing of copyrighted works that are publicly available on the Internet:

a. Employees may share links to copyrighted works hosted by copyright owners or their resellers without obtaining the permission of the copyright owner. When sharing links to copyrighted works in social media disclosures, employees may include an original description of the link they’re sharing, without the copyright owner’s approval.

b. Employees may share an excerpt of up to 140 characters with spaces from a copyrighted work, so long as a link to where that work is publicly available on the internet is included in their social media disclosure and provided that they are not blatantly using social media for the sole purpose of undermining the financial objectives of the copyright owner.

c. Employees may embed copyrighted content in their social media accounts, and share embeddable content in their social media disclosures, so long as the embed code has been provided by a rightful copyright owner or reseller.

d. In circumstances like disasters or emergencies, where the public’s right to know outweighs the financial objectives of a copyright owner, employees may share copyrighted works without the permission of the copyright owner. An example could be photographs uploaded to social media channels of a disaster to help others stay out of harm’s way.

M. Regulatory Matters

1. For regulatory reasons, employees are prohibited from distributing social media disclosures or engaging in online discussion that could be seen by regulators as advancing the interests. Employees are prohibited from leveraging, its regulated business, to advance the business interests of its unregulated business and employees are expected to comply with this regulation in all their social media disclosures.

N. During Emergencies

1. Social media tools are becoming increasingly important in local and incidental crisis and emergency management communications. Nevertheless, even in times of crisis, disaster or emergency, only Employees with the authority to speak on behalf of Carers Federation are permitted to do so.

2. If an employee who is not authorized to speak on behalf of the company has valuable information that could benefit those affected by a crisis, disaster or emergency, they may share that information via social media channels, so long as they include a disclaimer and do so in accordance with the guidelines of this policy.

3. All employees may use social media channels to extend the reach of official communications. While only those officially designated to are authorized to speak on behalf of the company, all employees are encouraged to share official content via social media channels, particularly during a crisis, disaster or emergency, so as long they take the time to verify that the information they are sharing is, in fact, official content. For example, before sharing a link, employees should always verify that (1) the source of the information is legitimate and (2) that the link they are sharing transmits to information hosted at domain.

4. If an employee decides to endorse or republish someone else's social media disclosure about, related topics or emergency relief information, **employees must first verify that the social media disclosure they are republishing was distributed by the designated source**. For example, before retweeting someone else's tweet, verify that the Twitter user cited did, in fact, distribute that tweet. There have been numerous cases where false tweets attributed to news sources were redistributed by other Twitter users, promoting misinformation and confusion.

O. Penalties

1. Failure to comply with these social media policies may result in:
 - a. Withdrawal, without notice, of access to information and/or information resources.
 - b. Disciplinary action, up to and including termination.
 - c. Civil or criminal penalties as provided by law.
2. Penalties against violating contractors and agencies may, at the company's discretion, be enforced against the contractor or agency's primary point of contact at and/or the employee to which the primary point of contact reports.

This policy has been developed incorporating the following best practice guidance:

- <https://www.gov.uk/government/consultations/draft-guidance-charities-use-of-social-media/draft-guidance-charities-and-social-media#set-a-social-media-policy>
- IBM Social Computing Guidelines
- AP Stylebook 2009, Briefing on Media Law
- Conduct on the Pentagon Reservation, Title 32, Code of Federal Regulations, Part 234 [PDF]
- Use of Social Media at FEMA, August 14, 20096.
- Social Media Business Council, Disclosure Best Practices Toolkit

Staff and Volunteer Expense Policy

Carers Federation (CF) will reimburse both staff and volunteers for reasonable out of pocket expenses incurred wholly, necessarily and exclusively in order to carry out business on its behalf. These expenses may include, for example, mileage allowance for use of own vehicle, travel fares, accommodation, meals and car parking charges.

All staff and volunteers are expected to travel using the most cost-effective mode of transport taking into account journey times and the reason for travel as well as the cost.

Where a personal vehicle is used, it is the responsibility of the owner to ensure that the vehicle is roadworthy, taxed and has a current MOT certificate. It is the responsibility of the staff member / volunteer to ensure that they have the appropriate level of insurance cover for the journey being undertaken but CF may require a copy of the insurance document.

If a staff member / volunteer is unsure about whether certain expenses may be reimbursed, (including whether a journey constitutes business travel under HMRC rules), they should check with their line manager prior to incurring the expense.

The following sets out the limits to be applied when claiming expenses and the process to be followed.

Car or Van Mileage	Paid in any one tax year (6th April to 5th April) 45p per mile – first 10,000 miles 25p per mile – any miles above 10,000 NB Staff transferred under TUPE may have different allowances
Motorcycle Mileage	24p per mile
Bicycle Mileage	20p per mile

Parking, tolls etc.	
Rail Travel	Standard class travel only – booked in advance where possible
Bus/Tube Fares	
Air Travel	Standard class travel only – booked in advance where possible
Taxi Fares	Only where public transport not available
Overnight Accommodation (London)	£125.00 per night limit – Premier Inn account to be used if possible breakfast should be included where possible
Overnight Accommodation (rest of UK)	£80.00 per night limit – Premier Inn account to be used if possible Breakfast should be included where possible. Prior authorisation required from line manager if nothing suitable available within limits
Breakfast	Should be included in room rate where possible. £10.00 per day
Lunch	£5.00 per day
Evening Meal	£20.00 per day
Incidental overnight expenses	£5 per night (UK) £10 per night (overseas)

Supporting Evidence

All expenses other than mileage must be supported by evidence of the expenditure such as a receipt or invoice showing the date, amount, any VAT applicable and a description of the goods/services.

Where receipts are not available, the following may be used as supporting documentation:-

Travel ticket

Print of online travel account such as a Mango card

Parking ticket

Procedure for claiming

It is the responsibility of the person claiming reimbursement to provide the correct supporting evidence for the amount claimed.

The claimant should complete a Staff / Volunteer Expense Claim Form at the end of each calendar month to request reimbursement of any personal expenses incurred.

The completed, signed form plus supporting documentation for all applicable expenses should be passed to the claimant's line manager for approval.

Line managers must check the details of the claim, the budget codes used and that supporting documentation is both present and accurate.

Authorised claims should be forwarded along with supporting receipts to the CSS department by 6th of the following month.

Approved expense claims will be paid together with the employee's salary or to the volunteer via BACS transfer.



Whistleblowing Policy and Procedure

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1. Introduction

Carers Federation seeks to conduct its business honestly and with integrity at all times. However, we acknowledge that all organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. By encouraging a culture of openness and accountability within Carers Federation, we believe that we can help prevent such situations occurring. We expect all staff to maintain high standards in accordance with our code of conduct and to report any wrongdoing that falls short of these fundamental principles. It is the responsibility of all staff to raise any concerns that they might have about malpractice within the workplace. The aim of this policy is to ensure that our staff, clients and the general public are confident that they can raise any matters of genuine concern without fear of reprisals, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

This policy is for guidance only and does not form part of an employee's contract of employment.

2. Legislative Framework

Whistleblowing is the disclosure of information by an individual which relates to some danger, fraud or other illegal or unethical conduct in the workplace. The Employment Rights Act 1996 as amended by the Public Interest Disclosure Act 1998 governs the making of disclosures concerning workplace activities and is intended to protect employees who blow the whistle on bad practice from being subjected to any detriment or unfairly dismissed as a result.

3. Personnel Responsible for Implementation of Policy

- 3.1 The *Board of Trustees* has overall responsibility for Carers Federation's policy on Whistleblowing, but has delegated day-to day responsibility for overseeing and implementing it to the designated Whistleblowing officer, the Chief Executive. Responsibility for monitoring and reviewing the operation of the policy and any recommendations for change within Carers Federation resulting from investigations into complaints under the policy lies with the *Board of Trustees*.
- 3.2 Managers have a specific responsibility to facilitate the operation of this policy and to ensure that workers and the public feel able to raise concerns without fear of reprisals in accordance with the procedure set down below. To facilitate this process, managers will be given training on the relevant legal and operational framework and best practice.
- 3.3 All staff are responsible for the success of this policy and should ensure that they take steps to disclose any wrongdoing or malpractice of which they become aware. If you have any questions about the content or application of this policy, you should contact your line manager.

4. Who is covered by the policy?

This policy applies to all individuals working for us at all levels and grades, whether they are senior managers, directors, employees, contractors, home workers or agency staff (collectively known as staff in this policy). Clients and members of the public can also make use of this policy to raise issues of concern about Carers Federation staff.

5. What disclosures are covered?

- 5.1 This policy is distinct from our grievance procedure and our anti-harassment and bullying procedure. If you have a complaint relating to your personal circumstances in the workplace then you should use the grievance procedure or anti-harassment and bullying procedure as appropriate. Concerns about malpractice within Carers Federation which affects or could affect, for example, customers, service users, and clients, members of the public or other members of staff should be raised using the procedure set out in paragraph 7.
- 5.2 You should use this policy if you have a genuine concern that there are reasonable grounds for believing that:
- a) A criminal offence has been committed, is being committed, or is likely to be committed; or
 - b) A person has failed, is failing or is likely to fail to comply with their legal obligations; or
 - c) A miscarriage of justice has occurred, is occurring, or is likely to occur; or
 - d) The health and safety of any individual has been, is being, or is likely to be endangered; or
 - e) The environment has been, is being, or is likely to be damaged; or
 - f) Any of the above are being, or are likely to be, deliberately concealed.
- 5.3 In the context of Carers Federation's business, particular concern which may fall within the terms of this policy include, for example, breach of our code of conduct, confidentiality, the provision of negligent advice, financial fraud, harassment occurring to others and health and safety. In general, this policy covers actions or omissions you consider are illegal, contrary to policy or established procedure or outside the scope of the individual's authority, actions which could damage Carers Federation's reputation and conflicts of interest. However, only disclosures concerning those actions falling strictly within the categories in paragraph 5.2 will be eligible for the relevant statutory protection.
- 5.4 We will value any concerns reported in good faith under this procedure. If you are uncertain whether the matters concerning you are within the scope of this policy (for example, if you are suspicious but uncertain as to whether the law has been broken, or whether a person is acting outside the scope of their authority), we encourage you to report the concerns to the CEO in accordance with the procedure set out in paragraph

6. To whom should a disclosure be made?

- 6.1 We recognise that you may not feel comfortable discussing concerns with your direct line manager. For the purposes of this procedure you are asked, in your first instance, to raise concerns about any form of malpractice falling within the categories outlined in paragraph 5 with the CEO. The CEO will report directly to the *Board of Trustees*.
 - 6.2 If the disclosure is extremely serious or in any way involves the CEO, you should report it directly to the Chair of the *Board of Trustees*.
 - 6.3 We will always endeavour to handle investigations promptly and fairly, but if you have made a disclosure under the procedure outlined in paragraph 5 and you are not satisfied with the investigation or its conclusion, you should write directly to the Chair of the *Board of Trustees*, detailing your concerns.
 - 6.4 We envisage that disclosures will be most likely to relate to the actions of our staff or managers but they may also relate to the actions of a third party, such as a client. It may be appropriate for you to raise your concerns directly with the third party where you believe that the malpractice identified relates solely or mainly to their conduct or a matter which is their legal responsibility. However, we would ask that you consult your Line Manager before speaking to the third party.
7. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any workplace wrongdoing. It is therefore hoped that it will be unnecessary for staff to alert external organisations or seek external assistance. However, in some circumstances, or following an internal report which has not been addressed, we recognise that it may be appropriate for you to report your concerns to an external body, such as a regulator or seek external support or assistance. The government has prescribed a list of appropriate bodies for such external reporting; for example, the Environment Agency and the Health and Safety Executive. A full list is available from an independent charity called: Protect, Speak Up, Stop Harm: <https://protect-advice.org.uk/>

8. How should a disclosure be made?

You can raise your concerns with the CEO orally or in writing. You must state that you are using the whistleblowing policy and specify whether you wish your identity to be kept confidential. The CEO will ask you to formalise your concerns in writing whether before or after the first meeting. The CEO will acknowledge receipt of your formal written disclosure and keep a record of further action taken.

You are entitled to be accompanied by a workplace colleague or union representative at any meeting under this procedure. Your companion will be asked to respect confidentiality of your disclosure and any subsequent investigation.

We recognise that disclosures made under this policy may involve highly confidential and sensitive matters and that you may prefer to make an anonymous disclosure. However, we regret that we cannot guarantee to investigate all anonymous allegations. Proper investigation may prove impossible if the investigator cannot obtain further

information from you, give you feedback, or ascertain whether your disclosure was made in good faith. It is preferable for whistleblowers to reveal their identity to the CEO and measures can be taken to preserve confidentiality if appropriate (see paragraph 9 on confidentiality).

9. Investigation of disclosure

Carers Federation is committed to investigating disclosures fully, fairly, quickly and confidentially where circumstances permit. Following your submission of a formal written disclosure, the CEO (or another individual acting in their place) will acknowledge receipt within five working days and make appropriate arrangements for investigation.

The length and scope of the investigation will depend on the subject matter of the disclosure. In most instances, the CEO will carry out an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information. In any event a report will be produced and copies will be provided to the *Board of Trustees* and, where appropriate, you will also receive a copy. If you are dissatisfied with the investigation or its conclusion then you should refer to paragraph 6.3.

If a longer investigation is considered necessary, we will usually appoint an investigator or investigative team including personnel with experience of operating workplace procedures or specialist knowledge of the subject matter of the disclosure. For example, if the disclosure concerns financial malpractice, the Finance Consultant may be asked to investigate. Separate personnel will be asked to make a judgement on the report submitted by the investigator (or investigative team). Recommendations for change will also be invited from the investigative team to enable us to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered. The *Board of Trustees* will then be responsible for reviewing and implementing these recommendations.

So far as the CEO considers it appropriate and practicable, you will be kept informed of the progress of the investigation. However, the need for confidentiality may prevent us giving you specific details of the investigation or actions taken. It is not normally appropriate to set a specific time frame for completion of investigations in advance, as the diverse nature of disclosures contemplated makes this unworkable. We will, however, aim to deal with all disclosures in a timely manner and with due regard to the rights of all individuals involved.

We recognise that there may be matters that cannot be dealt with internally and in respect of which external authorities will need to be notified and become involved either during or after our investigation. We will endeavour to inform you if a referral to an external authority is about to or has taken place, although we may need to make such a referral without your knowledge or consent if we consider it appropriate.

10. Confidentiality

Every effort will be made to keep the identity of an individual who makes a disclosure under this policy confidential, at least until any formal investigation is under way. In order not to jeopardise the investigation into the alleged malpractice, you will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential. There may, however, be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. This may occur in connection with associated disciplinary or legal investigations or proceedings. If in our view such circumstances exist, we will make efforts to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation, the fact that you made the original disclosure will, so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimisation or detriment as a result of having made a disclosure. It is likely, however, that your role as the whistleblower could still become apparent to third parties during the course of an investigation.

11. Protection and support for Whistleblowers

No-one who raises genuinely held concerns in good faith under this procedure will be dismissed or subjected to any detriment as a result of such action. Detriment includes unwarranted disciplinary action and victimisation. If you believe that you are being subjected to detriment within the workplace as a result of raising concerns under this procedure, you should inform the CEO immediately. Staff who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.

If an investigation under this procedure concludes that a disclosure has been made maliciously, vexatiously, in bad faith or with a view to personal gain, the whistleblower will be subjected to disciplinary action. Those choosing to make disclosures without following this procedure or anonymously may not receive the protection outlined in paragraph 10.1.

12. Corrective Action and Compliance

As part of the investigation into disclosures made under this policy, recommendations for change will be invited from the investigative team to enable Carers Federation to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered. The *Board of Trustees* will be responsible for reviewing and implementing these recommendations in the future and for reporting on any changes required to the main *Board of Trustees*.

13. Monitoring and Review of this Policy

This policy reflects the law and Carers Federation's practice as of October 2023 (the *reviewed date in the footer of this document*). The Deputy CEO, in conjunction with the *Board of Trustees* will be responsible for reviewing this policy from a legislative and operational perspective at last bi-annually.

The CEO has responsibility for ensuring that any personnel who may be involved with administration or investigations carried out under this policy receive regular and appropriate training to assist them with these duties.

Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the CEO.

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