

GATESBIELD QUAKER HOUSING ASSOCIATION LTD
MANAGEMENT PROCEDURE AND POLICY MANUAL

Martin Rouen

This manual is divided in to three volumes:

VOLUME I - Operational Procedures

The Operational Procedure volume is a reference for staff and others describing how staff should act in specific situations. Operational Procedures are normally set by the Scheme Manager, who should ensure that all procedures comply with the policies of the Association set down in Volume III - Policy Statements.

VOLUME II - Management Procedures

The Management Procedures volume is also reference for staff. Management Procedures apply to all staff (including the Scheme Manager) are approved by the Association's Committee of Management.

VOLUME III –Policy Statements

The Policy Manual is a compilation of policy statements adopted by the Association's Committee of Management.

The Procedure and Policy Manual is a 'living document'. All procedures are regularly reviewed and expanded as appropriate. All staff should be familiar with whole Procedure and Policy Manual.

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VOLUME II – Management Procedures

SECTION II-A: DISCIPLINARY PROCEDURE

Review Date: May 2015

Disciplinary Procedure

Purpose and Scope

The Association's aim is to encourage good conduct in its staff. This procedure sets out the action which will be taken when standards of good conduct are breached.

Principles

The procedure is designed to establish the facts quickly and to deal consistently with disciplinary issues. No disciplinary action will be taken until the matter has been fully investigated.

At every stage employees will have the opportunity to state their case and if they wish, be accompanied at the hearings, by a colleague or friend.

An employee has the right to appeal against any disciplinary penalty.

Stage 1 Oral Warning

If conduct or performance is unsatisfactory, the employee will be given a formal oral warning by the Chair of the Board of Management which will be recorded in writing and a copy placed on the employee's personal file. The employee will be informed of the consequences if further misconduct occurs or if performance does not improve. The warning will be disregarded after six months' satisfactory service. Any further disciplinary action need not be for the same or a similar offence to that contained in the oral warning.

Stage 2 Written Warning

If conduct or performance continues to be unsatisfactory or if the offence is serious, a written warning will be given by the Chair of the Board of Management, which will include reasons for the warning and a note that if there is no improvement after a specified period a final written warning will be given. A copy will be given to the employee and a copy placed on the employee's personal file.

Stage 3 Final Written Warning

If misconduct is more serious or performance is still unsatisfactory, a final written warning will be given by the Chair of the Board of Management, making it clear that any recurrence of the offence or other serious misconduct within a specified period will result in dismissal. A copy will be given to the employee and a copy placed on the employee's personal file.

Stage 4 Dismissal

If there is no satisfactory improvement or if further serious misconduct occurs, the employee will be dismissed by the Chair of the Board of Management.

Guidance

It should be noted throughout the above procedure that:

- General misconduct need not necessarily be of the same nature.
- The procedure may be initiated at the second or at a later stage, depending upon the gravity of the offences.
- The employee will be informed by the Chair of the Association of what constitutes acceptable standards of performance or behaviour and offered whatever help may be considered appropriate in meeting those standards. This could include appropriate training.
- In the event of the absence of the Chair, a deputy may be appointed to take the Chair's place.

Gross Misconduct

The following matters are examples of what is considered to be gross misconduct:

- theft or unauthorised possession of Association or other employees' property, or property belonging to residents of the Association;
- assault of employees or other third parties during the course of employment;
- being under the influence of alcohol or illegal drugs during employment;
- refusal to carry out reasonable management instructions within the terms of the contract of employment;
- endangering the health or safety of others;
- wilful damage to the property or possessions of the Association, other employees or those belonging to residents of the Association;
- acts of indecent or immoral behaviour during employment;
- any act of deceit or dishonesty relating to your employment, Association business or affairs;
- disclosure of any confidential information of the Association to any third party without prior authority or consent;
- racial, religious, sexual or disability discrimination/harassment
- victimisation.

This list is not exhaustive.

If, after investigation, it appears that an employee has committed gross misconduct the normal consequence will be dismissal. Any decision to dismiss will be taken by the Chair of the Board of Management or his/her deputy.

Appeals

An employee who wishes to appeal against any disciplinary decision must do so in writing to the Chairman of the Board of Management within five working days.

- At any stage, the employee may be accompanied by a colleague or friend.
- At all stages matters will be dealt with as expeditiously as possible.

SECTION II-B: GRIEVANCE PROCEDURE

Review Date: May 2015

Grievance Procedure

An employee who has a grievance related to matters connected with their employment with the Association should follow the procedure outlined below. Pending the outcome the status quo will be maintained.

Initial Approach

The employee should in the first place raise the matter with the Chair of the Board of Management on an informal basis. The Chair of the Board of Management will respond informally, normally within ten working days.

Stage One

If not resolved, the employee may submit the matter in writing to the Chair of the Board of Management. The Chair of the Board of Management will respond in writing, normally within ten working days.

Stage Two

If not resolved, the employee may request the Chair to bring the matter before the full Board of Management at their next meeting. The decision of the Board of Management will be given in writing to the employee normally within ten working days of the meeting.

At any stage the employee may be accompanied by a colleague or friend. In the absence of the Chair of the Board of Management, a deputy may be appointed to take the Chair's place.

SECTION II-B: DATA PROTECTION PROCEDURE

Data Protection Procedure

Any personal information collected about people is only for the legitimate purpose of running Gatesfield Quaker Housing Association. It is always securely stored and is not shared with any other body (except where this is required by law) without the subject's consent.

Personal information is held for no longer than necessary, taking into account legal obligations.

The Scheme Manager (or deputy) is the Data Controller for the Association and all queries should be addressed in first instance to him/her. Appeals can be made to the Chair (or deputy) of the Board.

All breaches, or suspected breaches, of data security must be reported immediately to the Controller, who must, in consultation with the Chair, report serious incidents to the Information Commissioner.

Tenants

Application forms are kept in a locked cabinet in the office. The information requested is that which is necessary to make an informed decision about the most suitable applicant. Some information will be a legal requirement. The waiting list is reviewed annually.

Tenant information is kept in a locked cabinet in the office.

Important information, which might be needed in an emergency, is kept on a card in a locked card index box. This includes emergency contacts, GP, place of birth, care arrangements, and essential medical information about conditions such as diabetes, warfarin use, epilepsy.

No information about medication is recorded, as this can change frequently and could lead to false information.

This information is duplicated for on-call night staff and is kept in a locked safe accessed by a code number.

A record is kept of daily morning telephone calls.

Incidents are noted in the desk diary.

A list of all tenants, their telephone numbers, and their birthdays, is provided to all tenants, as long as permission is given.

Photographs are sometimes taken at social events, and might be used in a newsletter or bulletin. Permission is received from all involved.

No information about any tenant is provided to another party without their express permission. When consent can't reasonably be obtained, information will be shared when it is in the person's vital interests.

Once a tenant leaves Gatesfield and their affairs have been settled their records are destroyed.

Staff

Information collected on the application form is necessary to help select the best candidate for a post and includes information that the Association is legally obliged to collect. The forms of unsuccessful candidates are shredded at the end of the recruitment process. The forms of successful candidates are retained on file.

Staff information is kept in individual files in a locked drawer. Only the scheme manager, the chair of the board, and the Company Secretary have access. Staff can at any time request access to their own files, in the presence of one of the 2 key holders. They can ask for information to be amended or removed. No member of staff has access to another's person's file. Information is retained until 6 months after employment at Gatesfield ends.

Bank details are kept on computer so that wages can be paid. This information and the pay schedules can be accessed only by the Company Secretary.

Supervision and appraisal notes are kept on computer.

Each member of staff has a computer password allowing access to a restricted area. Any attempt to access other areas will be considered a disciplinary matter.

All members of staff have a Gatesfield email address, which automatically leads to their private addresses if they wish.

The Business Manager and the Chair (or deputy) have access to all areas.

Volunteers

A list of Friends of Gatesfield and their contact details is kept in a locked cupboard. This information is not shared with anybody else. When they are contacted by email bcc is used.

Board

Board members have Gatesfield email addresses.

Contact details of board members are shared with staff and other Board members.

With their permission, all Board members' contact details are on a list in the office, so that staff can contact them in an emergency. A reminder that this information is confidential is added to the list.

Information is deleted once a person ceases to have a relationship with Gatesfield.

VOLUME III – Policy Statements

SECTION III-A: EQUAL OPPORTUNITIES

Review Date: May 2015

Equal Opportunities Policy Statement

Gatesbield Quaker Housing Association is committed to ensuring equality of opportunity for all those individuals or groups with whom it works. This means that in the allocation of housing and the provision of housing services, the Association will abide by the requirements of the following legislation:

Race Relations Act 1976
Sex Discrimination Act 1975
Disability Discrimination Act 1995
Protection from Harassment Act 1995
Crime and Disorder Act 1998
The Human Rights Act (1998)
Race Relations (Amendment) Act 2000

No person applying for housing with the Association will be treated less favourably than any other person or group because of their race, colour, ethnic origin or nationality, gender, disability, marital or family status, sexual orientation, age, domestic circumstances or illness (such as HIV and AIDS)

Dealing with racial harassment

Racial harassment will not be tolerated. Any action of racial harassment is in breach of the tenancy conditions and may result in possession proceedings being taken against the perpetrator. People who have been racially harassed are able to report incidents 24 hours a day.

Tenant involvement

Steps will be taken to encourage tenants from ethnic minority backgrounds and those with disabilities to get involved in consultations.

Responsibility for implementation

On a day to day basis, the Scheme Manager will ensure compliance. All staff have a responsibility to ensure the positive application of the policy.

Monitoring

The Association needs to have monitoring arrangements in place to check whether equal opportunities policies are being implemented properly and to ensure there is equal access to services for all minority groups.

Action plan

An action plan is being developed showing the actions that will be undertaken over the next 3 years to ensure compliance with the policy.

SECTION III-B: CONFIDENTIAL REPORTING

Review Date: May 2015

Confidential Reporting

Introduction

Employees will often be the first to realise that there may be something seriously wrong within the Association. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Association. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

The Association is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we encourage employees and others with serious concerns about any aspect of the Association's work to come forward and voice those concerns.

We recognise that some cases will have to be dealt with on a confidential basis and this document makes it clear that staff can raise matters confidentially without fear of reprisal.

This policy is intended to encourage and enable staff to raise serious concerns within the Association rather than overlooking or ignoring a problem or "blowing the whistle" outside.

Aims and Scope of this Policy

This policy aims to:

- provide an avenue for you to raise any concern you might have and to receive feedback on action taken.
- allow you to take the matter further if you are dissatisfied with the initial response you receive, and
- reassure you that you will be protected from reprisals or victimisation for "Whistle blowing" in good faith.

A Grievance Procedure is in place to allow you to raise any concerns relating to your own employment. This policy is intended to cover concerns that fall outside the scope of the Grievance Procedure. Such concern may be about something that:

- is unlawful; or
- a health and safety risk including risks to the public as well as other employees; or
- damages the environment; or
- is possible fraud and corruption; or
- is unethical conduct or improper conduct; or
- makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the Association subscribes to; or
- is against the Association's policies; or
- falls below established standards of practice

Safeguards

Harassment or Victimisation

The Association recognises that a decision to report a concern may be difficult, not least because you may fear reprisal from those about whose behaviour you are expressing concern.

The Association wishes to make it clear that harassment or victimisation (including informal pressures) of a person "whistle blowing" in good faith will not be tolerated and action will be taken to protect you when you raise a concern.

This does not mean that if you are the subject of disciplinary or redundancy procedures investigations that those proceedings will be halted as a result of your "whistle blowing".

Confidentiality

The Association will do its best to protect your identity when you raise a concern, if you do not wish your name to be disclosed. However, you must appreciate that the investigation process may have to reveal the source of the information and a statement by you may be required as part of the evidence gathered. Although every effort will be made to protect your identity if you wish it, no guarantee can be given.

Anonymous Allegations

You will be encouraged to give your name when you "whistle blow". This is because a concern expressed by a named individual carries much more weight than one expressed anonymously. Anonymous concerns will be considered at the discretion of the Association although they are less powerful.

In exercising discretion on whether or not to consider anonymous concerns, the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If however you make malicious or vexatious allegations, disciplinary action may be taken against you.

How To Raise A Concern.

Initially, you should raise any concern you have with your immediate manager. However, this depends of course on the seriousness and/or sensitivity of the matters causing you concern and who you think might be involved in the malpractice, e.g. if you believe management may be involved, you should approach the Chair or any other member of the Board of Management.

Obviously it is better if you present your concerns in writing. This will give you the opportunity to set out the background and history of the concern giving as many details as possible e.g. names, dates and places and the reasons why you are particularly concerned about the situation. However, if you do not feel able to put your concern in writing, you can ask for a meeting with whichever of the officers you consider to be appropriate.

Remember that the first step in any journey is the hardest. In this particular case, the sooner you express the concern the easier it will be for you and for the Association to take any appropriate action.

Although you will not be expected to prove the truth of an allegation, you will be expected to demonstrate to the manager to whom you reported the issue that there are sufficient grounds for concerns.

You may invite your trade union, professional association representative or a friend to be present during any meetings or interviews in connection with the concerns you have raised.

How the Association will respond

Any action taken by the Association will depend upon the nature of the concern you have raised. It may:

- be investigated internally;
- be referred to the police;
- be referred to the external auditor;
- form the subject of an independent enquiry.

In order to protect your identity and the Association, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

It may be possible to resolve some concern by agreed action without the need to carry out an investigation.

However if this is not the case then within ten working days of a concern being raised, the person to whom the concern has been forwarded will write to you:

- acknowledging that the concern has been received;
- indicating how the matter will be dealt with;
- giving an estimate of how long it will take to provide a final response;
- telling you what initial enquiries have been made, if any, and
- telling you whether further investigations will take place and if not, why not.

The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the Association will seek further information from you.

If any meeting is arranged, off-site if you so wish, you can be accompanied by a union or professional association representative or a friend.

The Association will take steps to minimise any difficulties, which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the Association will arrange for you to receive advice about the procedure.

The Association accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation.

The Association fully understand that if you have raised a complaint you will need to be reassured that the complaint has been properly addressed. Therefore, unless legal constraints prevent it, you will be fully informed about the outcome of any investigation, which is carried out.

How the matter can be taken further

This policy is intended to provide you with a way to raise concerns within the Association. It is hoped you will be satisfied with any outcome. If you do take the matter outside the Association (e.g. to the

police or the Association's Auditor), you should ensure that you do not disclose confidential information.

The Responsible Officer

The Chair, as the Association's appointed Monitoring Officer, has overall responsibility for the maintenance and operation of this Policy. He/she will maintain a record of all concerns raised and their outcomes (but in a form which will not endanger your confidentiality) and will report as necessary to the Board of Management.

SECTION III-C: HARRASSMENT

Review Date: May 2015

Harassment

Introduction

Gatesfield Quaker Housing Association is committed to ensure that no member of staff is discriminated against in any way. Harassment is an aspect of discrimination, which has no precise definition. It is behaviour or any action whether in person or via another form of communication (including Electronic Mail), which makes the recipient feel threatened, humiliated or patronised and creates an intimidating working environment. It should be borne in mind that standards of behaviour can be regarded as acceptable by one person yet regarded by someone else as harassment.

People can be subject to undignified behaviour on a wide variety of grounds including:

race, ethnic origin, nationality and skin colour, gender or sexual orientation, willingness to challenge harassment (leading to victimisation), membership or non-membership of a trade union, disabilities, sensory impairments or learning difficulties, status as an ex-offender, age, health, physical characteristics, personal beliefs.

This list is not definitive. It is possible for people to abuse their power over others in many different ways.

Harassment can range from extremes such as violence, to less obvious forms like ignoring someone, whatever form the harassment takes, it will be behaviour which is unwanted and unpleasant. Forms include:

- physical contact
- jokes, offensive language, gossip, slander, sectarian songs and letters
- posters, graffiti, obscene gestures, flags, bunting and emblems
- isolation or non-co-operation and exclusion from social activities
- coercion for sexual favours
- pressure to participate in political/religious groups
- intrusion by pestering, spying and stalking,

Harassment is an unacceptable form of behaviour which when reported will be treated seriously and dealt with in accordance with the Association's Disciplinary Procedure.

If an individual encounters any problems of harassment at work they should:

- make it perfectly clear to the harasser that their behaviour is unacceptable.
- if the behaviour continues report it to your manager, or to the Chair or any other Member of the Board of Management.

Procedure Notes

Dealing with complaints

Complaints should not be ignored but investigated swiftly and confidentially, whilst ensuring the rights of all are protected.

Informal Procedures

Preferably complaints should be dealt with internally and informally. This is better for all concerned as solutions can be reached speedily, with minimum embarrassment and risk to confidentiality. The first step is for the recipient of harassment to raise the problem with the perpetrator, explaining that

the behaviour is unacceptable. If this is difficult for the person concerned or it is the person's manager who is the harasser there will be an alternative contact.

Formal Procedures

More serious harassment, individual preference and situations where an informal approach has failed requires a Formal procedure to be implemented.

Investigation and Procedure

Harassment will be treated as a disciplinary offence. Investigative procedures should provide for: a prompt, thorough and impartial response

- independent, objective investigators
- representation for both parties
- complaint details and the right to and time to respond
- a time scale for problem resolution
- confidentiality for all
- thorough records of the complaints and the subsequent investigation must be kept.

Why do we need to be so concerned

Harassment can cause problems for both employees and employers. Harassment can lead to illness, absenteeism, poor performance and resignation. All of these issues cause problems for employers as they have to deal with the fall out from each problem.

However, it is not just something we need to do as part of our ideals as a good employer, certain types of harassment are regarded as unfair discrimination and are covered by statute. This can cover a wide range of issues such as Sexual and Racial harassment is covered by the Sex Discrimination Act 1975 and the Race Relations Act 1976. The Disability Discrimination Act 1995 protects people with disabilities, The Criminal Justice and Public Order Act 1995 protects against the use of threatening, abusive or insulting words or disorderly behaviour intended to cause harassment.

There are other Acts which take account of acts of harassment which the employers are liable for as it is their duty to provide a working environment which is safe and a requirement to maintain mutual trust and confidence.

SECTION III-D: SAFEGUARDING

Review Date: May 2015

Policy on Safeguarding Adults at Risk

Introduction

Gatesfield Quaker Housing Association recognises that all the people using its services have the same human value, rights and responsibilities as anyone else. Tenants should therefore be shown the same dignity and respect as others in society. The Association condemns all forms of abuse and neglect.

Gatesfield is committed to putting in place safeguards and measures to reduce the likelihood of abuse taking place within the services it offers and ensuring that all those involved within Gatesfield will be treated with respect.

Therefore this policy needs to be read in conjunction with the following policies:

- Equal Rights and Diversity
- Volunteers
- Complaints
- Whistle Blowing
- Confidentiality
- Disciplinary and Grievance
- Data Protection
- Recruitment and Selection

Principles

This policy is based upon the principles and values that govern how safeguarding procedures should be implemented. These reflect the most recent national guidance and Local Authorities Multi-Agency procedures. The underpinning aim is to achieve good outcomes for adults at risk, based upon a culture of acceptable risk (including a person's right to make the "wrong" decision). The six principles are explained below:

- **Empowerment** – adults should be in control of their own lives and their consent is needed for decisions and actions designed to protect them. It is therefore vital that, if someone has mental capacity and is able to make their own decisions, they maintain control, and the professional's role is to support their decision making at each stage of the process. This includes taking action only with consent unless there is clear justification to act contrary to the person's wishes eg. if they lack mental capacity, or they and/or others are in danger.
- **Protection** – procedures should provide a framework by which people can be supported to safeguard themselves from abuse/harm, or be protected where they are unable to make their own decisions about their safety (due to reasons of mental capacity)
- **Prevention** – this is the primary goal and everyone has a role in preventing abuse from occurring. This includes promoting awareness and understanding and supporting people to safeguard themselves. It also refers to Organisations having systems in place to minimise the risk of abuse.
- **Proportionality** – is the responsibility to ensure that responses to concerns/alerts are proportional to the assessed risk and the nature of the allegation/concern. Proportional decisions need to take into account the principles of empowerment and protection. Where a person lacks the mental capacity, any decisions made on their behalf must be made in the person's "best interests" and be least restrictive to their rights and freedoms.
- **Partnerships** – working together to prevent and respond effectively to incidents or concerns of abuse. This includes working with the person to support their decision making, with relatives, friends, informal carers and other representatives (eg. advocates)

to achieve positive outcomes for the person at risk. Also working collaboratively with other agencies and for statutory agencies to value the role of non-statutory partners.

- **Accountability** – involves transparency in decision making, by individuals and organisations, ensuring that defensible decisions are made and there are clear lines of accountability. This means that organisations, their staff and partners understand what is expected of them, that they act on those responsibilities and accept collective accountability for safeguarding arrangements.

Gatesfield is committed to safe recruitment policies and practices for paid staff and volunteers.

- This includes enhanced DBS disclosures for relevant staff and volunteers,
- Ensuring references are taken up and adequate training on Safeguarding Adults is provided for staff and volunteers.

The Association will work within the current legal framework for reporting staff who are responsible for hurting or harming people in their care.

Tenants will be encouraged to become involved with the running of the Association. Information will be available about abuse and the complaints policy and Safeguarding Adults policy statement will be available to tenants.

Our Safeguarding Adults policy and procedure recognise that adult abuse can be a difficult subject for workers to deal with. Gatesfield is committed to the belief that the protection of adults from abuse and neglect is everybody's responsibility and the aim of our procedures is to ensure that all workers and volunteers act appropriately in response to any concern around adult abuse.

Gatesfield appoints the Scheme Manager as the named individual who is responsible for dealing with any Safeguarding Adults concerns.

He/she can be contacted in the office or by pulling an emergency cord.

The roles and responsibilities of the Scheme Manager in this context are:

- To ensure that all staff are aware of what they should do and who they should go to if they have concerns that someone they know or are working with may be experiencing, or has experienced abuse or neglect.
- To ensure that concerns are acted on, clearly recorded and referred to Adult Social Care where appropriate.
- To follow up any referrals and ensure the issues have been addressed.
- To reinforce the need for confidentiality and to ensure that staff and volunteers are adhering to good practice with regard to confidentiality and security.
- To ensure that staff and volunteers working directly with service users who have experienced abuse, or who are experiencing abuse, are well supported and receive appropriate supervision.

Definition of Abuse

Abuse is a violation of an individual's human and civil rights by any other person or persons (No Secrets). Abuse is when a person or persons have caused harm, or may be likely to do so, to the physical, sexual, emotional, financial or material well being of a vulnerable person. Harm may be caused by direct acts, or by failure to provide adequate care. It may be systematic and repeated or may consist of a single incident.

Definition of At Risk

No Secrets guidance (2000) defined an adult at risk as someone who is in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of himself or herself, or unable to protect himself or herself against significant harm or serious exploitation.

Forms of Abuse

Abuse, which is a misuse of power and can take many forms including the following:

- Physical abuse (including actual or threatened physical attacks, verbal assault or neglect)
- Sexual abuse (including rape, other sexual assault, threatened touching or inappropriate sexual remarks)
- Emotional abuse (including any actions or comments which fail to show dignity and respect for the individual)
- Financial abuse (including misappropriation of the personal finances of people using our services, borrowing from people using our services etc.)
- Neglect, which is a failure properly to care for the physical and emotional needs of the person and to protect them from harm.
- Institutional Abuse where the rituals and routines mean individuals have to sacrifice their lifestyle to conform with those of the institution
- Discriminatory abuse (including that based on a person's race, nationality, gender, sexual orientation, disability, age, religion and social status)

Objectives

To ensure, so far as is reasonably practicable, that people using the Association's services do not suffer from abuse or neglect. Where incidents of abuse or neglect are reported or suspected, the Association will seek to deal with such incidents as speedily as possible, providing positive help, support and assistance to the alleged victim, and taking action against alleged perpetrators wherever possible.

Strategy

In order to achieve the above objectives the Association will:

1. Ensure that all staff working directly with people using the Association's services are informed of the Association's stand against abuse and neglect, and receive training in abuse awareness including instruction in what to do if:
 - Someone tells them that they are being abused
 - They suspect that a person is being abused
 - A third party reports suspected abuse to them

This policy should be read in conjunction with the Association's policy on confidential reporting or whistle blowing.

2. The Association will take a victim based approach to reports of abuse and neglect. A person reporting an alleged incident of abuse or neglect will be treated with dignity and respect. Where an allegation has been made in good faith the person making the allegation will be treated without prejudice in the future, even if the allegations prove to be unfounded. The alleged victim will be offered assistance where required (e.g. from an advocate) in order to make their allegation, and offered help, support and, most importantly, protection from the risk of further incidents.
3. The Association will be careful to protect the service user's right to confidentiality, and indeed that of the alleged perpetrator, as an allegation may prove to be unfounded. It will

establish clear guidelines as to who needs to be informed regarding different forms of alleged abuse or neglect in different projects.

4. The Association will consult with staff, other professionals and service users about the operation of this policy.
5. Where a member of staff is accused or suspected of abuse or neglect the member of staff will be subject to the Association's disciplinary procedures, and may be subject to criminal prosecution. A member of staff who fails to report an incident of abuse or neglect may also be subject to the Association's disciplinary procedure.

March 2015

SECTION III-E: HEALTH AND SAFETY

Review Date: May 2015

HEALTH & SAFETY POLICY STATEMENT

Health & Safety at Work etc Act 1974

This is the Health and Safety Policy Statement of
GATESBIELD QUAKER HOUSING ASSOCIATION LIMITED

Statement of general policy

- to provide adequate control of the health and safety risks arising from our work activities;
- to consult with our employees on matters affecting their health and safety;
- to provide and maintain safe plant and equipment;
- to ensure safe handling and use of substances;
- to provide information, instruction and supervision for employees;
- to ensure all employees are competent to do their tasks, and to give them adequate training;
- to prevent accidents and cases of work-related ill health;
- to maintain safe and healthy working conditions; and
- to review and revise this policy as necessary at regular intervals.

Signed:

Mary Robinson
Chair, Gatesbield Quaker Housing Association
(Employer)

Date:

Review date:

(Template non-underlined text taken from: "An introduction to health and safety. Health and safety for small businesses", HSE, Ref. INDG259(rev1), Reprinted Sept 2004)

Responsibilities

1. Overall and final responsibility for health and safety is that of:
Chair of Board of Management, Gatesfield Quaker Housing Association Ltd
2. Day-to-day responsibility for ensuring this policy is put into practice is delegated to:
Scheme Manager
3. To ensure health and safety standards are maintained/improved, the following people have responsibility in the following areas:

Name	Responsibility
<u>Marilyn Robinson</u>	<u>Health & Safety Advisor</u>

4. All employees have to:
 - co-operate with supervisors and managers on health and safety matters;
 - not interfere with anything provided to safeguard their health and safety;
 - take reasonable care of their own health and safety; and
 - report all health and safety concerns to an appropriate person (as detailed in this policy statement).
5. Health and safety standards, responsibilities and practices applicable to employees apply equally to volunteers and trustees working on our behalf.

Health and safety risks arising from our work activities

Risk assessments will be undertaken by:
Scheme Manager and the staff undertaking the tasks being assessed, plus the Health & Safety Advisor, if appropriate.

The findings of the risk assessments will be reported to:
Health & Safety Advisor
Scheme Manager and all staff.

A copy of each current risk assessment will be held in the Health & Safety file (in the Scheme Manager's office) and the Procedure Manual

Action required to remove/control risks will be approved by:
Scheme Manager
in consultation with other members of the Board of Management if appropriate.

The Scheme Manager will be responsible for ensuring the action required is implemented.

The Scheme Manager will check that the implemented actions have removed/reduced the risks.

Assessments will be reviewed every 12 months or when the activity changes, whichever is the soonest, and the copies in the Health & Safety file and the Procedure Manual updated accordingly.

Consultation with employees

Employee representative(s) are: ****

Consultation with employees is provided by:
meetings with staff representative, or with all staff, as appropriate.

Safe plant and equipment

The Scheme Manager will be responsible for identifying all equipment/plant needing maintenance.

The Scheme Manager will be responsible for ensuring effective maintenance procedures are drawn up.

The Scheme Manager will be responsible for ensuring that all identified maintenance is implemented.

Any problems with plant/maintenance should be reported to the Scheme Manager. If unresolved, the problem should be reported to the following members of the Board of Management:

Chair
Health & Safety Advisor

The Scheme/Manager, in consultation with member(s) of the Board of Management if appropriate, will check that new plant and equipment meets health and safety standards before it is purchased.

Safe handling and use of substances

The Scheme Manager will be responsible for identifying all substances which need a COSHH assessment.

The Scheme Manager will be responsible for undertaking COSHH assessments.

The Scheme Manager will be responsible for ensuring that all actions identified in the assessments are implemented.

The Scheme Manager will be responsible for ensuring that all relevant employees are informed about the COSHH assessments and that copies of the assessments are held both with the substances assessed and in the Health & Safety file (in the Scheme Manager's office).

Any member of staff purchasing new substances will check that the new substances can be used safely before they are purchased.

Assessments will be reviewed every *12 months* or when the work activity changes, whichever is the soonest, and copies of the assessments held with the substances and in the Health & Safety file will be updated accordingly.

Information, instruction and supervision

The Health and Safety Law poster is displayed in the Staff Change Room. Leaflets are issued by the Scheme Manager.

Health and safety advice is available from the Health & Safety Advisor, and from the file of Health & Safety guidance held in the Scheme Manager's office.

Supervision of young workers/trainees will be arranged/undertaken/monitored by the Scheme Manager

The Scheme Manager is responsible for ensuring that our employees working at locations under the control of other employers, are given relevant health and safety information.

Competency for tasks and training

Health & Safety Induction training will be provided for all employees by the Health & Safety Advisor, the Scheme Manager and/or a suitable appointed external trainer as appropriate.

Job specific training will be provided by the Scheme Manager, other staff and/or a suitable appointed external trainer as appropriate.

Specific jobs requiring special training are:

Cook – Food hygiene

All – Safe lifting / manual handling

Training records are kept by the Scheme/Manager in her/his office.

Training will be identified, arranged and monitored by:

The Scheme Manager

Health & Safety Advisor.

Accidents, first aid and work-related health

Health surveillance is required for employees doing the following jobs:

(not applicable)

If it becomes required, health surveillance will be arranged by the Scheme Manager, in consultation with the Health & Safety Advisor.

If it becomes required, health surveillance records will be kept by the Scheme Manager in her/his office.

The first aid box(es) is/are kept in the Scheme Manager's office and the night-staff quarters.

The appointed person(s)/first aider(s) is/are:

Andree Cook and All Staff

All accidents and cases of work-related ill health are to be recorded in the accident book. This book is kept by the Scheme Manager in her/his office.

The Scheme Manager is responsible for reporting accidents, diseases and dangerous occurrences to the enforcing authority.

Monitoring

To check our working conditions, and ensure our safe working practices are being followed, we will:

- Investigate accidents and work-related causes of sickness absences
- Periodically check through the requirements identified in our procedures, risk assessments, COSHH assessments and Health & Safety Policy Statement, in meetings between the Scheme Manager and the OSAG Group.

The Scheme Manager is responsible for investigating accidents.

The Chair of the Board of Management is responsible for investigating work-related causes of sickness absences.

The Chair of the Board of Management, and/or the Health & Safety Advisor, and/or the Scheme Manager, as appropriate, are responsible for acting on investigation findings to prevent a recurrence.

Emergency procedures – fire and evacuation

The Scheme Manager is responsible for ensuring the fire risk assessment is undertaken and implemented.

Escape routes are checked by the Scheme Manager every week.

Fire extinguishers are maintained and checked by a suitable appointed company every 12 months.

Pendant Alarms are tested by the Scheme Manager or a deputy every month.

Emergency evacuation will be tested every six months.

SECTION III-F: WORKING WITH DISPLAY SCREEN EQUIPMENT

Review Date: May 2015

Work and Display Screen Equipment

Statement of general policy

The policy of GQHA is to comply with the Health and Safety at Work Act, 1974, specifically the Health and Safety (Display Screen Equipment) Regulations 1992.

These regulations apply only to workers who regularly use DSE as a significant part of their normal work. Gatesbiel's policy is to follow the guidelines provided by the HSE for all workers who use DSE as part of their duties.

Responsibilities:

The HSE checklist is used by the scheme manager or the nominated board member to ensure that the office and workstation meet legal requirements and that staff are working safely.

The assessment is reviewed when the work station changes.

Staff are advised on the safest ways of using display screen equipment.

Eye tests can be provided on request for workers who use DSE daily for continuous periods of an hour or more if there appears to be evidence that use of the screen is causing eye strain.

Date:

Review date:

SECTION III-G: GIFTS AND HOSPITALITY

Review Date: May 2015

Gifts and Hospitality

Accepting gifts is a dangerous practice. Employees are advised to tactfully refuse all such offers from persons who do, or might, provide works, goods or services to the Association or who need some decisions from the Association.

Exceptions from this general rule include modest gifts of a promotional character e.g. calendars, diaries, articles for office use or a small gift during courtesy visits to a firm. When refusal of a small gift would cause needless offence and it is given to express thanks for advice or co-operation received, it should be accepted openly and if possible shared among a group of those involved.

Such exceptions relate only to modest gifts and an expensive gift would raise questions even if it would fall within one of the above categories. It is impossible to be more precise in dealing with what do and do not amount to acceptable gifts and this is very much a matter for the individual judgement of employees given the particular circumstances.

When to accept hospitality is again very much a matter of judgement given the particular circumstances and it would be wrong to produce an atmosphere in which employees refused all invitations for social involvement with persons or bodies who have, or may seek to have in the future, business dealings with the Association. Contacts established at a social level can often be helpful in pursuing the Association's interests. What is important is to avoid any suggestion of improper influence or giving others the opportunity reasonably to impute improper influence.

The extent of the hospitality will be a factor as to its acceptability. It may be more reasonable to join in hospitality to a group than to accept something as an individual.

When a particular person or body has a matter currently in issue with the Association, then common sense dictates a more restrictive approach. An important criteria in exercising judgement is what interpretation others may place on acceptance.

SECTION III-H: DATA PROTECTION POLICY

Data Protection Policy

Gatesbielld Quaker Housing Association policy conforms to the 2018 General Data Protection Regulations.

Information about individuals (tenants, prospective tenants, staff, volunteers) is collected only in order to provide a service to the tenants of Gatesbielld. No more data is collected or stored other than that in which the Association has a legitimate interest. No more information than is necessary is stored, it is kept securely, and it is stored for no longer than necessary. Information is shared with other organisations only with express permission or in the 'vital interests' of the person concerned. People have a right to know why information is collected, how it is stored, how they can have access to their own data, how they can have it changed or destroyed, and how to complain. The Scheme Manager (or deputy) is the Data Controller for the Association, and all queries should be addressed in the first instance to him/her (or deputy). Appeals can be made to the Chair of the Board of Management (or deputy).

Confidentiality and security of information are taken very seriously. Breaches or suspected breaches of data security must be reported immediately to the Controller, who will, in consultation with the Chair, report serious incidents to the Information Commissioner.