

VOLUNTEER POLICY BOOKLET



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OCT 2022

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N.B Where reference is made in the policy documents to employees or staff, this also covers volunteers. Please speak to your Volunteer Service Lead if you have any questions.

Bullying and Harassment Policy

Policy

We recognise that harassment and victimisation is unlawful under the Equality Act 2010. As such, harassment or victimisation on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation is unacceptable and will not be tolerated.

Personal harassment takes many forms ranging from tasteless jokes and abusive remarks to pestering for sexual favours, threatening behaviour and actual physical abuse. For the purposes of this policy, it also includes bullying.

Bullying is understood to be targeted and persistent offensive, intimidating, malicious or insulting behaviour and can include the abuse or misuse of power to undermine, humiliate, denigrate or injure the recipient.

Whatever form it takes, personal harassment is always taken seriously and is totally unacceptable.

We recognise that personal harassment can exist in the workplace, as well as outside, and that this can seriously affect employees' working lives by interfering with their job performance or by creating a stressful, intimidating and unpleasant working environment.

We deplore all forms of personal harassment and seek to ensure that the working environment is sympathetic to all our employees. The aim of this policy is to inform employees of the type of behaviour that is unacceptable and provide employees who are the victims of personal harassment with a means of redress.

This policy covers all areas of the Charity's organisation.

We recognise that we have a duty to implement this policy and all employees are expected to comply with it. We will also endeavour to review this policy at regular intervals in order to monitor its effectiveness.

Examples of personal harassment

Personal harassment takes many forms and employees may not always realise that their behaviour constitutes harassment. Personal harassment is unwanted behaviour by one employee towards another and examples of harassment include:

- insensitive jokes and pranks
- lewd or abusive comments
- deliberate exclusion from conversations
- displaying abusive or offensive writing or material
- abusive, threatening or insulting words or behaviour
- name-calling
- picking on someone or setting them up to fail
- exclusion or victimisation
- undermining their contribution/position
- demanding a greater work output than is reasonably feasible
- blocking promotion or other development/advancement.

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against employees committing any form of personal harassment.

Examples of sexual harassment

Sexual harassment can take place in many forms within the workplace and can go undetected for a period of time where employees do not understand that particular behaviour is classed as sexual harassment. Sexual harassment is unwanted behaviour related to sex, or of a sexual nature, by one employee towards another and examples of sexual harassment include:

- lewd or abusive comments of a sexual nature such as regarding an individual's appearance or body
- unwelcome touching of a sexual nature
- displaying sexually suggestive or sexually offensive writing or material
- asking questions of a sexual nature
- sexual propositions or advances, whether made in writing or verbally.

Sexual harassment can also take place where an employee is treated less favourably because they have rejected, or submitted to, the unwanted conduct that is related to sex or is of a sexual nature. Whether less favourable treatment occurs as a result will be examined broadly and includes areas such as blocking promotion and refusal of training opportunities or other development opportunities.

Examples of victimisation

Victimisation takes place when an employee is treated unfavourably as a direct result of raising a genuine complaint of discrimination or harassment. Furthermore, any employee who supports or assists another employee to raise a complaint is also subjected to victimisation if they are treated unfavourably.

Third party harassment

The Charity operates a zero tolerance policy in relation to harassment perpetrated against one of its employees by a third party, such as a client/customer or visitor to the organisation. All employees are encouraged to report any and all instances of harassment that involve a third party in line with our reporting procedure, as outlined below.

If we find that the allegation is well-founded, we will take steps we deem necessary in order to remedy this complaint. This can include, but is not limited to:

- warning the individual about the inappropriate nature of their behaviour
- banning the individual from Charity premises
- reporting the individual's actions to the police.

In addition to this, the Charity will endeavour to take all reasonable steps to deter and prevent any form of harassment from third parties taking place.

Responsibilities

Employee responsibilities

The Charity requires its employees to behave appropriately and professional at all times during the working day, and this may extend to events outside of working hours which are classed as work-related such as social events. Employees should not engage in discriminatory, harassing or aggressive behaviour towards any other person at any time.

Any form of harassment or victimisation may lead to disciplinary action up to and including dismissal if it is committed:

- in a work situation
- during any situation related to work, such as a social event
- against a colleague or other person connected to the employer outside of a work situation, including on social media
- against anyone outside of a work situation where the incident is relevant to their suitability to carry out the role.

A breach of this policy by will be treated as a disciplinary manner.

Employer responsibilities

The Charity will be responsible for ensuring all members of staff, including seniors and those within management positions, understand the rules and policies relating to the prevention of harassing and bullying behaviour at work and during work-related social events. We will promote a professional and positive workplace whereby managers are alert and proactively identify areas of risk and incidents of harassment, sexual harassment and bullying.

We will also take into account aggravating factors, such as abuse of power over a more junior colleague, when deciding what disciplinary action to take.

Where an incident is witness, or a complaint is made under this policy, the Charity will take prompt action to deal with this matter. All incidents will be deemed serious and dealt within in a sensitive and confidential manner.

Complaining about harassment and/or bullying

Informal method

People are often afraid to report incidents involving their colleagues in case nobody believes them or in case they are ostracised and told they have no sense of humour or are accused of somehow provoking the incident. At worst they fear being denied future opportunities within the Charity.

We recognise that complaints of personal harassment, and particularly of sexual harassment, can sometimes be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances you are encouraged to raise such issues with a senior colleague of your choice (whether or not that person has a direct supervisory responsibility for you) as a confidential helper.

If you are the victim of minor harassment you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If you feel unable to do this verbally then you should hand a written request to the harasser, and your confidential helper can assist you in this.

Although these fears are understandable, the Charity will ensure they do not happen and will treat allegations seriously and sympathetically.

All investigations will be handled quickly and in a sensitive, tactful manner but it must be emphasised that any investigations are likely to be traumatic and stressful for ALL parties.

Formal method

Where the informal approach fails or if the harassment is more serious, employees should bring the matter to the attention of their line manager as a formal written grievance and again their confidential helper can assist you in this. If possible, employees should keep notes of the harassment so that the written complaint can include:

- the name of the alleged harasser
- the nature of the alleged harassment
- the dates and times when the alleged harassment occurred
- the names of any witnesses
- any action already taken by the employee to stop the alleged harassment.

Where it is not possible to make the formal complaint to the above named person, for example where they are the alleged harasser, we would encourage the employee to raise their complaint to the Chief Executive Officer.

On receipt of a formal complaint we will take action to separate the employee from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area or suspension with contractual pay until the matter has been resolved.

On conclusion of the investigation, which will normally be within five days of the meeting with the employee, a report of the findings will be submitted to the manager who will hold the grievance meeting.

The employee will be invited to attend a meeting, at a reasonable time and location, to discuss the matter once the person hearing the grievance has had opportunity to read the report. Employees have the right to be accompanied at such a meeting by a colleague or a union representative and they must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

Employees will be able to put their case forward at the meeting and the manager will explain the outcome of the investigation. Employees have a right to appeal the outcome, which is to be made to their line manager within five working days of receiving the outcome.

If the decision is that the allegation is well founded, the harasser will be liable to disciplinary action in accordance with our disciplinary procedure up to and including dismissal. The Charity is committed to ensuring employees are not discouraged from using this procedure and no employee will be victimised for having brought a complaint.

Confidentiality Policy

PURPOSE

The dignity and choice of older people coming into contact with Age UK Faversham and Sittingbourne (AUKFS) must be recognised and valued at all times. The right to privacy is essential to any service user so they have trust and confidence in the organisation and know they will be treated with respect and dignity. In all our work we strive to ensure that older people and their carers have as much control of their lives as possible and that the work we do is in response to their needs and wishes.

Everything that is said to staff, trustees and volunteers by older people should be regarded as confidential. Similarly, in trustee, sub-committees and staff meetings, any discussion of older people and issues that have arisen should be regarded as confidential. Sometimes specific facts will be underlined as confidential, this does not mean other information should not be treated in the same way.

SCOPE

This policy explains how confidentiality is maintained within the organisation and what to do when this poses difficulties and dilemmas.

POLICY

The principle of confidentiality covers any information concerning the internal affairs of AUKFS and should be embraced equally by trustees, staff and volunteers. There are several reasons for this policy:

- To protect people who contact us and those who use our services.
- To provide practical guidance to AUKFS representatives.
- To protect the charity, its trustees, staff and volunteers.
- To comply with the General Data Protection Regulations (GDPR; see separate Data Protection policy).

Board members, staff and volunteers will be made aware of this policy when first joining the organisation and will be asked to sign that they have read and understood the policy and will abide by it. In the case of staff, their contracts will state the necessity of adhering to this policy and will make it clear that a breach could be a serious disciplinary matter.

USE OF INFORMATION

1 General enquiries

Enquirers can make a general approach to AUKFS rather than an individual staff member or volunteer. As such, any information “belongs” to AUKFS, not the individual staff member. Confidentiality does not prevent discussion between AUKFS representatives in order to offer the fullest response to a request.

2 Marketing

Direct marketing including selling products or services and promotional activities are subject to the General Data Protection Regulations and Electronic Communications (EC) Directive regulations. No representative of AUKFS can make unsolicited phone calls to someone who has told AUKFS that they do not want calls from the charity. AUKFS representatives cannot send unsolicited marketing materials by electronic mail or fax without getting permission first. All approved marketing by AUKFS representatives must identify the sender and the name and address of the charity.

When individuals say they do not want to receive marketing materials this request must be dealt with promptly (generally within 5 working days and in all cases within 4 working weeks).

3 Trustees

Members of the Board of Trustees have a right to information held by the organisation and are responsible for the policies and procedures of the organisation. However, any such information will not be disclosed unnecessarily to Trustees unless such disclosure is relevant and necessary.

Individual Trustees will not elicit information of a personal nature except where it is relevant to resolving a defined task. A record will be kept of all requests by trustees to view a file containing details of a personal nature. The record will summarise the nature and scope of the information disclosed and the reason for the disclosure.

Given their rights of access it is vital that Trustees maintain strict confidentiality about the affairs of the organisation, its employees, users and anyone else involved with it.

Trustees are required to sign a copy of this policy agreeing to observe strict confidentiality about AUKFS affairs, unless this is information that is (or can reasonably be expected to be) public. Breaches of this requirement may lead to a Trustee being required to resign from the Board.

4 Employees

Service Managers/Team Leaders may “need to know” confidential information about other staff members. Access, storage and disposal of confidential information about employees is subject to the same principles as confidential information held by staff in respect of users. Confidential information will therefore: -

- Be restricted to those who need to know.
- Paper records will be kept securely locked in filing cabinets.
- Access to computer files will be restricted to those who need to know.

5 Volunteers

A volunteers’ pack is given to all new volunteers. This requires that they respect the privacy of users, maintain strict confidentiality about the affairs of the organisation and its employees and do not disclose to others information they have gained during their voluntary work. They are also required to sign this policy which binds them to these conditions.

Information concerning volunteers is held by the Volunteer Co-ordinator and/or service managers. Volunteers have a right to expect that information given to AUKFS will be treated as confidential.

6 Additional requirements

In relation to some services (such as information and advice) there may be additional confidentiality requirements that apply to meet regulatory or good practice guidance.

LOCATION

Collecting personal information from service users should be carried out in private.

- Offices – Interview rooms should be used, wherever possible. Visitors should always be asked whether they wish to discuss their circumstances privately.
- Users Homes – Effort should be made to exclude people who have no legitimate interest in the information given. This includes anyone who the user does not want to be present including spouses, children or their carers. If in doubt the interview should be postponed.
- Day Centres – Should take place away from main activities. Clients should always be asked whether they wish to discuss their circumstances privately and a separate room should be made available.
- Telephone – The conversation should take place with as much privacy as possible and where people who are not representatives of AUKFS cannot overhear. If you are in doubt, information should be confirmed when meeting face-to-face.

DISCLOSURE

Any information given by any service user must only be used for the purpose for which it is given and may not be released to another person without the permission of the user. However, a user may choose to waive confidentiality if it is in his/her own interest to do so

in which case information may be given to a third party. The user's consent can be provided in writing or verbally.

Internally to another service

When a service user is referred to another service within AUKFS, they have a right to know and must give their permission, in writing or verbally, which will be recorded, for the referral.

To another organisation or individual

If it is necessary to disclose information to another organisation or individual, the person about whom the information is concerned, must give their permission before further action is taken. Consent will ideally be given in line with the organisations Consent Statement, however where not possible the statement will be shared verbally and verbal consent can be accepted and recorded, validating actions taken on an individual's behalf. Without this permission there is a breach of confidentiality because action would be taken without the knowledge or consent of the person and may not be in accordance with their wishes or in their best interests.

Disclosure in exceptional circumstances

Not all situations are straightforward, in particular there may be occasions where, in the judgement of a staff member, a person is at serious risk or party to criminal activity but still does not want information to be passed on.

Our commitment to respect individual choice, independence and privacy may pose difficulties and dilemmas for us. There may be situations where an AUKFS representative has been unable to secure agreement of an individual to disclose information. The AUKFS representative must always discuss proposals to involve a third party against the wishes of a user with their line manager or AUKFS's Chief Executive Officer.

If after full discussion, it is decided that confidentiality should be broken the user must be informed immediately and reasons for our action should be explained.

RECORDS

Background

AUKFS is registered under the General Data Protection Regulations which forms part of the data protection regime in the UK, together with the Data Protection Act 2018 (DPA 2018). The Act gives protection against possible dangers arising from the use and storage of recorded personal information, both manual and computer held records AUKFS must comply with the requirements that the data which we hold is:

- Processed lawfully, fairly and in a transparent manner in relation to individuals;
- 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 not be considered to be incompatible with the initial purposes;
- Must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and, where necessary kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regards to 6 the purposes for which they are processed, are erased or rectified without delay;

- Kept in a format which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
- 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 organisation measures.

Record keeping in practice

It is not always necessary to keep detailed records about enquiries or service users, but where there is a need to do so, the following procedures will apply:

- Information on records should be as accurate as possible and the source of the information included.
- Only records relevant to the service or services being used should be kept.
- All records should be based on fact. Personal observations about the character of the individual or their circumstances should not be recorded without supporting information.
- Records should be reviewed at regular intervals and at least annually.
- Measures should be taken to ensure data is not altered, destroyed or disclosed.
- Written records should be kept in a locked filing cabinet to which access is restricted to the appropriate member of staff responsible for the service.
- Service users, staff and volunteers have the right with reasonable notice, to view AUKFS's records relating to them.

DISPOSAL

Old records and files should be regularly monitored, and information destroyed when it is no longer necessary to keep it. Any files, papers, records containing names and addresses should when no longer needed be destroyed. All personal information should be destroyed by shredding.

Those records no longer required should be archived or destroyed.

- Records required to meet statutory/other conditions – archived for the relevant period specified by statute, regulation or contractual agreement.
- Routine enquiries - held for 6-12 months then destroyed. (single and short contact)
- Non-current service user records - held for 12 months, or for a (without casework) further 12 month period following a review and then destroyed.
- Casework records - held for 6 years.
- HR records - archived for 7 years, then destroyed.

The same principles should be applied to confidential information in memos, staff diaries, briefing papers and minutes of meetings. However, one full set of Board minutes should be permanently archived.

See AUKFS's Data Protection Policy for a full list of record keeping storage and disposal requirements.

MAINTAINING CONFIDENTIALITY

The confidentiality policy will form part of the Employee Handbook and all employees will be required to confirm that they have read and understood the confidentiality policy and sign a declaration. Trustees and volunteers will be required to confirm that they have read and understood the confidentiality policy and sign a declaration.

Breaches of confidentiality should be reported to the relevant line manager, recorded and investigated. Serious breaches will be reported to the Chief Executive Officer.

Any member of staff, trustee or volunteers found neglecting or misusing personal information will be subject to disciplinary procedures.

TERMS USED IN THIS DOCUMENT

- Organisation: Age UK Faversham and Sittingbourne (AUKFS)
- AUKFS Representative: any trustees, staff and volunteers acting on behalf of the organisation Staff: any paid employee.
- Volunteer: any unpaid representative of AUKFS including trustees
- Third Parties: those people who contact AUKFS on behalf of an older person such as relatives, carers, friends or neighbours. Third parties also include Organisations and their representatives.
- Service Users: all those people who directly use AUKFS's services.

Conflict of Interest Policy

Definition:

Conflict of interest is defined as:

“a situation in which someone in a position of trust has competing professional and/or personal interests.

Such competing interests can make it difficult to fulfil his or her duties fairly. Even if there is no evidence of improper actions, a conflict of interest can create an appearance of impropriety that can undermine confidence in the ability of that person to act properly.”

In the context of advocacy services, conflict of interest includes but is not limited to:

- breach of confidentiality;
- abuse of trust;
- personal gain;
- divided loyalty e.g. providing personal care and advocacy to the same person or feeling limits to ability to fully advocate due to funder also being service commissioner and / or provider.

Conflict of Interest Policy

Age UK Faversham & Sittingbourne has a fundamental belief that the work of Age UK Faversham & Sittingbourne should be provided in an independent manner, free from any possible conflict of interest. For the purpose of this policy a conflict of interest occurs when an individual or organisation is unable to ensure the independence of the service due to their involvement with other people groups, funders or affiliations.

The Board of Trustees is responsible for and has an obligation to ensure that all of the work of Age UK Faversham & Sittingbourne staff and volunteers is undertaken in such a way as to prevent any possible conflict of interest.

Age UK Faversham & Sittingbourne requires all personnel to be aware of the potential for any possible or actual conflict of interest and to follow agreed procedures to avoid any such occurrence.

The Board of Trustees reserves the right to take any necessary and timely actions in the event of any conflict of interest and these will be taken as soon as the issue arises.

The Board of Trustees will ensure that the credibility and independence of Age UK Faversham & Sittingbourne is not compromised in any respect.

Age UK Faversham & Sittingbourne recognises that issues arising from any conflict of interest can be difficult to manage, stressful and potentially damaging to both the advocacy partnership and reputation of the service.

Conflict of interest can adversely affect the ability of Age UK Faversham & Sittingbourne to offer independent advocacy and support to the service user.

The advocacy partnership can be damaged by any conflict of interest as the service user may lose confidence and trust in the service.

The Board of Trustees has an obligation to ensure that any decisions, judgements or support is not affected by any possible conflict of interest.

Age UK Faversham & Sittingbourne recognises that it cannot offer advocacy services or act in the best interest of both parties in a dispute; the impartiality and independence of the advocacy service could be brought into question.

Conflict of Interest in advocacy work may arise as a potential issue in a number of ways:-

- Where both parties to a dispute approach Age UK Faversham & Sittingbourne for support.
- Where an employee or volunteer from Age UK Faversham & Sittingbourne is party to the dispute either in a professional or personal capacity.
- The service user wishes to complain about Age UK Faversham & Sittingbourne a member of paid staff or a volunteer.
- Where an issue arises that could result in potential action being taken against Age UK Faversham & Sittingbourne.
- If a member of staff has a role outside Age UK Faversham & Sittingbourne which could be perceived as them having conflicting interests.
- Individual, personal or family interests or other involvements conflict with those of Age UK Faversham & Sittingbourne or the role of the advocate.
- Where the service user presents with a case based on information that is known to be false i.e. welfare benefits, tax, etc.
- If the service user asks for information about any other products or services that are commercially available from Age UK Faversham & Sittingbourne.
- In some cases the potential referrer, commissioning authority or service user may perceive a conflict of interest.
- Where friends or family members are employed by Age UK Faversham & Sittingbourne.
- In the event of Age UK Faversham & Sittingbourne supplying more than one service to an individual or other group.

Procedures

Governing Body

- Both new and existing trustees must declare any interests which may conflict with the work and aims of Age UK Faversham & Sittingbourne.

- A declaration form must be signed on an annual basis and any changes of circumstance notified to the Chief Executive Officer.
- Trustees must withdraw from any discussion or decision making where there is a potential conflict of interest.

Staff and Volunteers

- All staff and volunteers will be required to declare at the initial interview any conflict of interest. A decision based on this information will be made by the Line Manager and where necessary by the Governing Body.
- Members of staff and volunteers should be made aware of the need to declare any possible conflict of interest.
- Any gifts, hospitality etc should be declared in accordance with the Gifts Policy of Age UK Faversham & Sittingbourne.
- In the event of any possible conflict of interest the matter should be discussed immediately with the Line Manager.
- If a conflict of interest arises the member of staff or volunteer should not remain involved with the case or in any decisions that directly affect the service user.
- All staff and volunteers should ensure that their private, personal or family interests do not affect their judgement, decisions or actions.
- Staff and volunteers should not use their position for any personal or professional gain for themselves, family or friends.
- Staff and Volunteers need to declare if they have worked with a service user on a previous occasion i.e. during paid employment to avoid conflict of interest. This would also apply if the volunteer was or had previously worked for any of the parties involved in the case.
- Personnel wishing to undertake secondary employment should inform their Line Manager to ensure that a possible conflict of interest is avoided.
- During the initial referral the Line Manager should establish whether the prospective advocate has any known involvement with the new service user.
- If a potential conflict of interest is identified the service user should be referred to another advocate.
- The advocate should find out who the other parties may be in relation to the service user's case and whether there could be any conflict of interest.
- In some cases it may be necessary to ask the service user if he/she knows whether the other party has consulted any organisation on the matter.

- Where a conflict of interest has been identified a note should be made on the case file to show a conflict check has been carried out.
- Accurate case records should be maintained, kept up to date and monitored to establish whether the advocacy service already supports the other party.
- If a conflict of interest becomes apparent the advocate should discuss the matter immediately with their Line Manager and it should be considered on a case by case basis.
- At this stage the situation should be explained to the service user and the case passed to another advocate or appropriate alternative organisation. A record should be kept of this transfer.
- If a conflict of interest does emerge following preliminary information being given to a second party, no further action should be taken with the second party. The second party should be informed that Age UK Faversham & Sittingbourne is already acting for another party with regard to the issue.
- No details of any work undertaken with the first party should be discussed with other parties.
- Should Age UK Faversham & Sittingbourne discover that unknowingly work has been undertaken with both parties or when conflict arises between the parties after the casework has begun the advocate should cease to act in the matter.

False Information

Advocates must remain impartial and support the service user to provide truthful and accurate information. However, if it becomes clear that false information is being presented; for example to the Inland Revenue or Department of Work and Pensions, the service user must be informed of the possible consequences. If the service user still wishes to pursue the matter on the basis of false information they should be informed that Age UK Faversham & Sittingbourne cannot continue to act on their behalf.

Potential Legal Action against Age UK Faversham & Sittingbourne.

If it becomes apparent that the service user could have a claim against Age UK Faversham & Sittingbourne due to negligence, the Line Manager should inform the Chief Executive Officer who may need to contact the insurers who deal with professional indemnity. A decision would then need to be taken to refer the service user to another appropriate agency.

Data Protection Policy

Aim and scope of policy

This policy applies to the processing of personal data in manual and electronic records kept by Age UK Faversham and Sittingbourne in connection with its human resources function as described below. It also covers the Charity's response to any data breach and other rights under the General Data Protection Regulation and current Data Protection Act.

This policy applies to the personal data of job applicants, existing and former employees, apprentices, volunteers, placement students, workers and self-employed contractors. These are referred to in this policy as relevant individuals.

"Personal data" is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person's name, identification number, location, online identifier. It can also include pseudonymised data.

"Special categories of personal data" is data which relates to an individual's health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes).

"Criminal offence data" is data which relates to an individual's criminal convictions and offences.

"Data processing" is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The Charity makes a commitment to ensuring that personal data, including special categories of personal data and criminal offence data (where appropriate) is processed in line with GDPR and domestic laws and all its employees conduct themselves in line with this, and other related, policies. Where third parties process data on behalf of the Charity, the Charity will ensure that the third party takes such measures in order to maintain the Charity's commitment to protecting data. In line with current data protection legislation, the Charity understands that it will be accountable for the processing, management and regulation, and storage and retention of all personal data held in the form of manual records and on computers.

Types of data held

Personal data is kept in personnel files or within the Charity's HR systems. The following types of data may be held by the Charity, as appropriate, on relevant individuals:

- name, address, phone numbers - for individual and next of kin
- CVs and other information gathered during recruitment
- references from former employers
- National Insurance numbers
- job title, job descriptions and pay grades
- conduct issues such as letters of concern, disciplinary proceedings
- holiday records
- internal performance information

- medical or health information
- sickness absence records
- tax codes
- terms and conditions of employment
- training details.

Relevant individuals should refer to the Charity's privacy notice for more information on the reasons for its processing activities, the lawful bases it relies on for the processing and data retention periods.

Data protection principles

All personal data obtained and held by the Charity will:

- be processed fairly, lawfully and in a transparent manner
- be collected for specific, explicit, and legitimate purposes
- be adequate, relevant and limited to what is necessary for the purposes of processing
- be kept accurate and up to date. Every reasonable effort will be made to ensure that inaccurate data is rectified or erased without delay
- not be kept for longer than is necessary for its given purpose
- be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- comply with the relevant data protection procedures for international transferring of personal data.

In addition, personal data will be processed in recognition of an individuals' data protection rights, as follows:

- the right to be informed
- the right of access
- the right for any inaccuracies to be corrected (rectification)
- the right to have information deleted (erasure)
- the right to restrict the processing of the data
- the right to portability
- the right to object to the inclusion of any information
- the right to regulate any automated decision-making and profiling of personal data.

Procedures

The Charity has taken the following steps to protect the personal data of relevant individuals, which it holds or to which it has access:

- it appoints or employs employees with specific responsibilities for:
 - a. the processing and controlling of data
 - b. the comprehensive reviewing and auditing of its data protection systems and procedures
 - c. overseeing the effectiveness and integrity of all the data that must be protected.

There are clear lines of responsibility and accountability for these different roles.

- it provides information to its employees on their data protection rights, how it uses their personal data, and how it protects it. The information includes the actions relevant individuals can take if they think that their data has been compromised in any way
- it provides its employees with information and training to make them aware of the importance of protecting personal data, to teach them how to do this, and to understand how to treat information confidentially
- it can account for all personal data it holds, where it comes from, who it is shared with and also who it might be shared with
- it carries out risk assessments as part of its reviewing activities to identify any vulnerabilities in its personal data handling and processing, and to take measures to reduce the risks of mishandling and potential breaches of data security. The procedure includes an assessment of the impact of both use and potential misuse of personal data in and by the Charity
- it recognises the importance of seeking individuals' consent for obtaining, recording, using, sharing, storing and retaining their personal data, and regularly reviews its procedures for doing so, including the audit trails that are needed and are followed for all consent decisions. The Charity understands that consent must be freely given, specific, informed and unambiguous. The Charity will seek consent on a specific and individual basis where appropriate. Full information will be given regarding the activities about which consent is sought. Relevant individuals have the absolute and unimpeded right to withdraw that consent at any time
- it has the appropriate mechanisms for detecting, reporting and investigating suspected or actual personal data breaches, including security breaches. It is aware of its duty to report significant breaches that cause significant harm to the affected individuals to the Information Commissioner, and is aware of the possible consequences
- it is aware of the implications international transfer of personal data internationally.

Consent

If consent is relied upon as the lawful basis for collecting, holding, and/or processing personal data, the following shall apply:

- Consent is a clear indication by the data subject that they agree to the processing of their personal data. Such a clear indication may take the form of a statement or a positive action. Silence, pre-ticked boxes, or inactivity are unlikely to amount to consent.
- Where consent is given in a document which includes other matters, the section dealing with consent must be kept clearly separate from such other matters.
- Data subjects are free to withdraw consent at any time and it must be made easy for them to do so. If a data subject withdraws consent, their request must be honoured promptly.

- If personal data is to be processed for a different purpose that is incompatible with the purpose or purposes for which that personal data was originally collected that was not disclosed to the data subject when they first provided their consent, consent to the new purpose or purposes may need to be obtained from the data subject.
- If special category personal data is processed, the Charity shall normally rely on a lawful basis other than explicit consent. If explicit consent is relied upon, the data subject in question must be issued with a suitable privacy notice in order to capture their consent.
- In all cases where consent is relied upon as the lawful basis for collecting, holding, and/or processing personal data, records must be kept of all consents obtained in order to ensure that the Charity can demonstrate its compliance with consent requirements.

Access to data

Relevant individuals have a right to be informed whether the Charity processes personal data relating to them and to access the data that the Charity holds about them. Requests for access to this data will be dealt with under the following summary guidelines:

- to make a subject access request, an email should be sent to SAR@ageukfaversham.org.uk describing, in as much detail as possible, the information you wish to have access to. If appropriate, please include any dates relevant to the information sought.
- please also confirm your full name, employee/payroll number and your address in the email.
- the Charity will not charge for the supply of data unless the request is manifestly unfounded, excessive or repetitive, or unless a request is made for duplicate copies to be provided to parties other than the employee making the request
- the Charity will respond to a request without delay. Access to data will be provided, subject to legally permitted exemptions, within one month as a maximum. This may be extended by a further two months where requests are complex or numerous.

Relevant individuals must inform the Charity immediately if they believe that the data is inaccurate, either as a result of a subject access request or otherwise. The Charity will take immediate steps to rectify the information.

Data disclosures

The Charity may be required to disclose certain data/information to any person. The circumstances leading to such disclosures include:

- any employee benefits operated by third parties
- disabled individuals - whether any reasonable adjustments are required to assist them at work
- individuals' health data - to comply with health and safety or occupational health obligations towards the employee
- for Statutory Sick Pay purposes
- HR management and administration - to consider how an individual's health affects his or her ability to do their job
- the smooth operation of any employee insurance policies or pension plans.

These kinds of disclosures will only be made when strictly necessary for the purpose.

Data security

The Charity adopts procedures designed to maintain the security of data when it is stored and transported.

In addition, employees must:

- ensure that all files or written information of a confidential nature are stored in a secure manner and are only accessed by people who have a need and a right to access them
- ensure that all files or written information of a confidential nature are not left where they can be read by unauthorised people
- refrain from sending emails containing sensitive work related information to their personal email address
- check regularly on the accuracy of data being entered into computers
- always use the passwords provided to access the computer system and not abuse them by passing them on to people who should not have them
- use computer screen blanking to ensure that personal data is not left on screen when not in use.

Personal data relating to employees should not be kept or transported on laptops, USB sticks, or similar devices, unless authorised by Clare Burgess, Chief Executive Officer. Where personal data is recorded on any such device it should be protected by:

- ensuring that data is recorded on such devices only where absolutely necessary
- using an encrypted system — a folder should be created to store the files that need extra protection and all files created or moved to this folder should be automatically encrypted
- ensuring that laptops or USB drives are not left lying around where they can be stolen.

Failure to follow the Charity's rules on data security may be dealt with via the Charity's disciplinary procedure. Appropriate sanctions include dismissal with or without notice dependent on the severity of the failure.

International data transfers

The Charity does not transfer personal data to any recipients outside of the EEA.

Breach notification

Where a data breach is likely to result in a risk to the rights and freedoms of individuals, it will be reported to the Information Commissioner within 72 hours of the Charity becoming aware of it and may be reported in more than one instalment.

Individuals will be informed directly in the event that the breach is likely to result in a high risk to the rights and freedoms of that individual.

If the breach is sufficient to warrant notification to the public, the Charity will do so without undue delay.

Training

New employees must read and understand the policies on data protection as part of their induction.

All employees receive training covering basic information about confidentiality, data protection and the actions to take upon identifying a potential data breach.

The nominated data controller/auditors/protection officers for the Charity are trained appropriately in their roles under data protection legislation.

All employees who need to use the computer system are trained to protect individuals' private data, to ensure data security, and to understand the consequences to them as individuals and the Charity of any potential lapses and breaches of the Charity's policies and procedures.

Records

The Charity keeps records of its processing activities including the purpose for the processing and retention periods in its HR data record. These records will be kept up to date so that they reflect current processing activities.

Data Protection Officer

The Charity's Data Protection Officer is Clare Burgess, Chief Executive Officer. She can be contacted at SAR@ageukfaversham.org.uk.

Equality & Diversity and Equal Opportunities

Introduction

We are an equal opportunities employer. We are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination. The aim of this policy is to ensure that no applicant or member of staff receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It seeks also to ensure that no person is victimised or subjected to any form of bullying or harassment.

We value people as individuals with diverse opinions, cultures, lifestyles and circumstances. All employees are covered by this policy and it applies to all areas of employment including recruitment, selection, training, deployment, career development, and promotion. These areas are monitored and policies and practices are amended if necessary to ensure that no unfair or unlawful discrimination, intentional, unintentional, direct or indirect, overt or latent exists.

The Chief Executive Officer has particular responsibility for implementing and monitoring the Equality and diversity policy and, as part of this process, all personnel policies and procedures are administered with the objective of promoting equality of opportunity and eliminating unfair or unlawful discrimination.

All employees, workers or self-employed contractors whether part time, full time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training, or any other [benefit](#) will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the Charity.

Equality of opportunity, valuing diversity and compliance with the law is to the benefit of all individuals in our Charity as it seeks to develop the skills and abilities of its people. While specific responsibility for eliminating discrimination and providing equality of opportunity lies with managers and supervisors, individuals at all levels have a responsibility to treat others with dignity and respect. The personal commitment of every employee to this policy and application of its principles are essential to eliminate discrimination and provide equality throughout the Charity.

Equity

The Charity recognises the need for equity, which is about giving people what they need in order to make things fair. It's about ensuring everyone has access to the same opportunities, recognising inequalities and taking steps to address them. Equity recognises that we don't all start from the same place because advantages and barriers exist.

We acknowledge that uneven starting places exist and as a Charity we look to correct the imbalance by giving more to those who need it.

The Charity will work with our employees to ensure an understanding of equity is embedded throughout our service, including recruitment, promotion, and training opportunities. We will also take this approach with our Clients.

Our commitment as an employer

The Charity is committed to:

- creating an environment in which individual differences and the contributions of our staff are recognised and valued
- entitling every employee, worker or self-employed contractor to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated
- providing training, development and progression opportunities to all staff
- understanding equality in the workplace is good management practice and makes sound business sense
- reviewing all our employment practices and procedures to ensure fairness.

Our commitment as a service provider

The Charity is committed to:

- providing services to which all clients are entitled regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, offending past, caring responsibilities or social class
- making sure our services are delivered equally and meet the diverse needs of our service users and clients by assessing and meeting the diverse needs of our clients
- fully supporting this policy by senior management and ensuring agreement has been reached with employee representatives
- selecting those for employment, promotion, training, or any other benefit purely on the basis of aptitude and ability
- monitoring and reviewing this policy annually
- having clear procedures that enable our clients, candidates for jobs and employees to raise a grievance or make a complaint if they feel they have been unfairly treated
- treating breaches of our equality and diversity policy as misconduct which could lead to disciplinary proceedings
- encouraging all staff to come forward with any issues they need Charity assistance and understanding with, no matter their background, identity or circumstances, such as if they are victims of domestic abuse or have caring commitments. challenging discriminatory behaviour by clients whether this is directed against staff or other clients. If discriminatory behaviour, remarks, or attitudes are repeated we reserve the right in extreme circumstances to decline further service.

The Accessible Information Standard

All organisations that provide NHS care and / or publicly funded adult social care are legally required to follow the Accessible Information Standard. Age UK Faversham and Sittingbourne aims to follow this Standard when dealing with its staff, volunteers and clients. The Standard sets out a specific, consistent approach to identifying, recording, flagging, sharing and meeting the information and communication support needs of patients, service users, carers and parents with a disability, impairment or sensory loss.

The Accessible Information Standard aims to make sure that people who have a disability, impairment or sensory loss get information that they can access and understand, and any communication support that they need from health and care services.

The Standard tells organisations how they should make sure that patients and service users, and their carers and parents, can access and understand the information they are given. This includes making sure that people get information in accessible formats.

The Standard also tells organisations how they should make sure that people get support from a communication professional if they need it, and about changing working practices to support effective communication.

By law (section 250 of the Health and Social Care Act 2012), all organisations that provide NHS care or adult social care must follow the Standard in full from 1st August 2016 onwards. Organisations that commission NHS care and / or adult social care, for example Clinical Commissioning Groups (CCGs), must also support implementation of the Standard by provider organisations.

What does the Standard tell organisations to do?

As part of the Accessible Information Standard, organisations that provide NHS care or adult social care must do five things. They must:

1. Ask people if they have any information or communication needs, and find out how to meet their needs.
2. Record those needs clearly and in a set way.
3. Highlight or flag the person's file or notes so it is clear that they have information or communication needs and how to meet those needs.
4. Share information about people's information and communication needs with other providers of NHS and adult social care, when they have consent or permission to do so.
5. Take steps to ensure that people receive information which they can access and understand, and receive communication support if they need it.

What does the Standard include?

The Standard says that patients, service users, carers and parents with a disability, impairment or sensory loss should:

- Be able to contact, and be contacted by, services in accessible ways, for example via email or text message.
- Receive information and correspondence in formats they can read and understand, for example in audio, braille, easy read or large print.
- Be supported by a communication professional at appointments if this is needed to support conversation, for example a British Sign Language interpreter.
- Get support from health and care staff and organisations to communicate, for example to lip-read or use a hearing aid.

More information

There is more information about the Accessible Information Standard on the NHS England website at www.england.nhs.uk/accessibleinfo.

For more information please email NHS England at england.nhs.participation@nhs.net or telephone 0300 311 22 33. Or you can write to Accessible Information Standard, NHS England, 7E56, Quarry House, Quarry Hill, Leeds, LS2 7UE.

Equal opportunity policy statements

Age

We will:

- ensure that people of all ages are treated with respect and dignity
- ensure that people of working age are given equal access to our employment, training, development and promotion opportunities and
- challenge discriminatory assumptions about younger and older people.

Disability

We will:

- provide any reasonable adjustments to ensure disabled people have access to our services and employment opportunities
- challenge discriminatory assumptions about disabled people and
- seek to continue to improve access to information by ensuring availability of loop systems, braille facilities, alternative formatting and sign language interpretation.

Race

We will:

- challenge racism wherever it occurs
- respond swiftly and sensitively to racist incidents and
- actively promote race equality in the Charity.

Gender

We will:

- challenge discriminatory assumptions about women and men
- take positive action to redress the negative effects of discrimination against women and men
- offer equal access for women and men to representation, services, employment, training and pay and encourage other organisations to do the same and
- provide support to prevent discrimination against transsexual people who have or who are about to undergo gender reassignment.

Sexual orientation

We will:

- ensure that we take account of the needs of lesbians, gay men and bisexuals and
- promote positive images of lesbians, gay men and bisexuals.

Religion or belief

We will:

- ensure that employees' religion or beliefs and related observances are respected and accommodated wherever possible and
- respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

Pregnancy or maternity

We will:

- ensure that people are treated with respect and dignity and that a positive image is promoted regardless of pregnancy or maternity
- challenge discriminatory assumptions about the pregnancy or maternity of our employees and
- ensure that no individual is disadvantaged and that we take account of the needs of our employees' pregnancy or maternity.

Marriage or civil partnership

We will:

- ensure that people are treated with respect and dignity and that a positive image is promoted regardless of marriage or civil partnership;
- challenge discriminatory assumptions about the marriage or civil partnership of our employees and
- ensure that no individual is disadvantaged and that we take account the needs of our employees' marriage or civil partnership.

Ex-offenders

We will prevent discrimination against our employees regardless of their offending background (except where there is a known risk to children or vulnerable adults).

Equal pay

We will ensure that all employees, male or female, have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent work or work of equal value.

Unconscious bias

The Charity recognises the dangers of unconscious bias arising at work, which is where an opinion is formed on an individual by a manager or colleague without them necessarily being aware they have formed it.

There are many different forms of unconscious bias, ranging from an affinity towards those of a similar background to placing too much significance on what has been identified as a negative trait.

The Charity will work against forms of unconscious bias in all decisions taken for employment, including recruitment, promotion and training opportunities, with a focus on promoting diversity and inclusion.

Conditions of Service

It is a condition of service that all staff adhere to Age UK Faversham & Sittingbourne's equal opportunity policy and failure to do so will lead to disciplinary action being taken.

All members of the Trustee Board will be expected to accept and adhere to the provisions of the equal opportunity policy.

All volunteers will be expected to abide by the provision of the policy in their work for the Charity.

Any staff member who seriously or repeatedly harasses another member of staff or anyone else connected with the Charity will be liable for dismissal for gross misconduct. Similarly, any Trustee or volunteer found to have breached the rules of this code in this regard will be asked to resign.

Gifts, Legacies & Anti-Bribery Policy

Definition

Bribery is, in the conduct of the Charity's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. The Charity prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Age UK Faversham and Sittingbourne employees or by third parties acting for or on behalf of Age UK Faversham and Sittingbourne.

Purpose

The purpose of this policy is to convey to all employees and interested parties of Age UK Faversham and Sittingbourne the rules of the Charity in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Age UK Faversham and Sittingbourne conducts its business in a fair, professional and legal manner.

Offences

It is a criminal offence to:

- offer a bribe
- accept a bribe
- bribe a foreign official
- as a commercial organisation, to fail to prevent a bribe.

Employees should be aware that if they are found guilty by a court of committing bribery, they could face up to 10 years in prison and/or an unlimited fine. The Charity could also face prosecution and be liable to pay a fine.

Definitions of bribery and corruption

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

Scope

This policy applies to all employees of Age UK Faversham and Sittingbourne, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

Policy

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe ie gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or Company or Charity in order to gain commercial, contractual or regulatory

advantage for the Charity, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. Employees should not make a payment to a third party on behalf of a foreign public official.

If Employees are offered a bribe, or a bribe is solicited from them, they should not agree to it unless their immediate safety is in jeopardy. Employees should immediately contact the Chief Executive Officer so that action can be taken if considered necessary. They may be asked to give a written account of events.

If an employee or person working on our behalf suspect that an act of bribery, or attempted bribery, has taken place, even if they are not personally involved, they are expected to report this to contact the Chief Executive Officer. Employees may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The Charity will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

The Charity takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in the employees dismissal, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Employees are reminded of the Charity's whistleblowing policy which is available in the employee handbook, or upon request.

Gifts, hospitality and legacies

The Charity realises that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

It is not uncommon for clients who have developed sometimes long and close relationships with individual employees to offer gifts or gratuities or to seek to include an employee in their will. However, such activities can lead to accusations of coercion, exploitation and fraud. It

is vitally important to Age UK Faversham and Sittingbourne that its employees at all times uphold the highest standards of the Charity and always act in an honest manner with the best interest of the clients in mind.

Therefore, in this Charity:

- (a) personal gifts must never be accepted by an employee if the value of the gift is estimated to be more than £5.
- (b) employees must never, under any circumstances, accept valuables belonging to a client or monetary gifts.
- (c) any gift given to an employee must be declared as soon as reasonably practicable and details recorded in the Gifts Record in the office; this must include the date that the gift was given and its monetary value and must be signed by the recipient.
- (d) employees must not use their personal store loyalty cards when shopping on behalf of clients.
- (e) employees should never become involved with the making of a clients will or with soliciting any form of bequest from a client. They should never agree to act as a witness or executor of a clients will nor become involved in any way with any other legal document. If a client does need help with making a will or requests help from an employee then the client should be referred to an impartial or independent source of legal advice such as the local citizens advice bureau or solicitor.
- (f) failure to declare a gift, the accepting of a gift in excess of £5 in value, the involvement of a will or attempting to solicit money or items through a client's will or legacy will be considered a disciplinary offence.

Hospitality and Business Gifts

The following procedures should be adopted in relation to hospitality and business gifts:

- a) All offers of business gifts must be referred to the Chief Executive Officer
- b) A record of any business gift received must be recorded with the reason the gift has been made.
- c) The Charity does not provide hospitality
- d) Cash gifts from business are expressly prohibited
- e) The acceptance of small promotional gifts, such as diaries, pens or similar will generally be regarded as acceptable
- f) All employees have a responsibility to prevent, detect and report all instances of bribery and must inform the Chief Executive Officer immediately.

As the law is constantly changing, this policy is subject to review and the Charity reserves the right to amend this policy without prior notice.

Definition

Bribery is, in the conduct of the Charity's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. The Charity prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Age UK Faversham and Sittingbourne employees or by third parties acting for or on behalf of Age UK Faversham and Sittingbourne.

Purpose

The purpose of this policy is to convey to all employees and interested parties of Age UK Faversham and Sittingbourne the rules of the Charity in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Age UK Faversham and Sittingbourne conducts its business in a fair, professional and legal manner.

Offences

It is a criminal offence to:

- offer a bribe
- accept a bribe
- bribe a foreign official
- as a commercial organisation, to fail to prevent a bribe.

Employees should be aware that if they are found guilty by a court of committing bribery, they could face up to 10 years in prison and/or an unlimited fine. The Charity could also face prosecution and be liable to pay a fine.

Definitions of bribery and corruption

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

Scope

This policy applies to all employees of Age UK Faversham and Sittingbourne, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

Policy

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe ie gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or Company or Charity in order to gain commercial, contractual or regulatory advantage for the Charity, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. Employees should not make a payment to a third party on behalf of a foreign public official.

If Employees are offered a bribe, or a bribe is solicited from them, they should not agree to it unless their immediate safety is in jeopardy. Employees should immediately contact the Chief Executive Officer so that action can be taken if considered necessary. They may be asked to give a written account of events.

If an employee or person working on our behalf suspect that an act of bribery, or attempted bribery, has taken place, even if they are not personally involved, they are expected to report this to contact the Chief Executive Officer. Employees may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The Charity will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

The Charity takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in the employees dismissal, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Employees are reminded of the Charity's whistleblowing policy which is available in the employee handbook, or upon request.

Gifts, hospitality and legacies

The Charity realises that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

It is not uncommon for clients who have developed sometimes long and close relationships with individual employees to offer gifts or gratuities or to seek to include an employee in their will. However, such activities can lead to accusations of coercion, exploitation and fraud. It is vitally important to Age UK Faversham and Sittingbourne that its employees at all times uphold the highest standards of the Charity and always act in an honest manner with the best interest of the clients in mind.

Therefore, in this Charity:

- (g) personal gifts must never be accepted by an employee if the value of the gift is estimated to be more than £5.
- (h) employees must never, under any circumstances, accept valuables belonging to a client or monetary gifts.
- (i) any gift given to an employee must be declared as soon as reasonably practicable and details recorded in the Gifts Record in the office; this must include the date that the gift was given and its monetary value and must be signed by the recipient.
- (j) employees must not use their personal store loyalty cards when shopping on behalf of clients.
- (k) employees should never become involved with the making of a clients will or with soliciting any form of bequest from a client. They should never agree to act as a witness or executor of a clients will nor become involved in any way with any other legal document. If a client does need help with making a will or requests help from an employee then the client should be referred to an impartial or independent source of legal advice such as the local citizens advice bureau or solicitor.
- (l) failure to declare a gift, the accepting of a gift in excess of £5 in value, the involvement of a will or attempting to solicit money or items through a client's will or legacy will be considered a disciplinary offence.

Hospitality and Business Gifts

The following procedures should be adopted in relation to hospitality and business gifts:

- g) All offers of business gifts must be referred to the Chief Executive Officer
- h) A record of any business gift received must be recorded with the reason the gift has been made.
- i) The Charity does not provide hospitality
- j) Cash gifts from business are expressly prohibited
- k) The acceptance of small promotional gifts, such as diaries, pens or similar will generally be regarded as acceptable
- l) All employees have a responsibility to prevent, detect and report all instances of bribery and must inform the Chief Executive Officer immediately.

As the law is constantly changing, this policy is subject to review and the Charity reserves the right to amend this policy without prior notice.

Health and Safety Policy

Purpose

The policy, read in line with the Charity's Health and Safety Policy Statement, outlines the responsibilities in relation to health and safety.

Responsibilities

The following sections describe the levels of responsibility by which health and safety is managed.

Employer

The Chief Executive Officer (CEO) is the designated person with overall responsibility for ensuring our compliance with health and safety legislation. They will ensure that:

- our Health and Safety policy documentation and Health and Safety Management System are implemented, monitored, developed, communicated effectively, reviewed and amended as required
- a health and safety plan of continuous improvement is created and progress monitored
- staff understand the allocated responsibilities for health and safety defined in this policy
- suitable and sufficient funds, people, materials and equipment are provided to meet all health and safety requirements
- adequate insurance cover is provided and renewed
- competent persons are appointed to provide health and safety assistance and advice
- an adequate system of maintenance exists and operates to keep premises, plant and work equipment in a safe condition
- they communicate and consult with staff on health and safety issues
- an effective training programme is established to ensure staff are competent to carry out their work in a safe manner
- the monitoring activities required by this system are undertaken
- effective contingency plans are in place with a designated competent person in charge of the planning and control measures for situations involving imminent danger
- health and safety objectives are set and their achievement is measured and reported in the annual report.

Management

Managers will ensure that in their areas of control:

- they actively lead the implementation of our Health and Safety Policy and Health and Safety Management System
- they supervise their staff to ensure that they work safely, providing increased supervision for new and young workers
- safe systems of work are developed and implemented
- risk assessments are completed, recorded and regularly reviewed covering all processes and activities where a risk to health and safety exists. The significant findings of these assessments are brought to the attention of staff who may be affected
- adequate resources are allocated to implement the safety policy and meet all safety requirements

- the health and safety plan of continuous improvement is progressed and scheduled actions are completed on time and validated
- accidents, ill health and 'near miss' incidents at work are investigated, recorded and reported
- they communicate and consult with staff on health and safety issues
- they encourage staff to report hazards and raise health and safety concerns
- safety training for staff is identified, undertaken and recorded to ensure staff are competent to carry out their work in a safe manner
- issues concerning safety raised by anyone are thoroughly investigated and, when necessary, further effective controls implemented and communicated to staff
- welfare facilities are provided and maintained in a satisfactory state
- premises, plant and work equipment are maintained in a safe condition
- statutory examinations are planned, completed and recorded
- any safety issues that cannot be dealt with are referred to a senior manager for action
- health and safety rules are followed by all
- the monitoring and checking activities required by this system are completed.

Supervisors

Supervisors will ensure that in their areas of control:

- they implement our Health and Safety Policy and Health and Safety Management System
- they supervise their staff to ensure that they work safely, providing increased supervision for new and young workers
- they communicate and consult with staff on health and safety issues.
- health and safety rules are followed by all
- health and safety checklists required by this system are completed at the designated frequencies
- the health and safety plan of continuous improvement is progressed, actions completed, and any problems are reported to a manager. Scheduled actions are completed on time and validated
- they encourage staff to report hazards and raise health and safety concerns.
- issues concerning safety raised by anyone are thoroughly investigated and, when necessary, further effective controls implemented and communicated to staff
- any safety issues that cannot be dealt with are referred to a senior manager for action
- safety training for staff is identified, undertaken and recorded to ensure they are competent to carry out their work in a safe manner
- safe systems of work are developed and implemented
- accidents, ill health and 'near miss' incidents at work are investigated, recorded and reported
- personal protective equipment is readily available and maintained, and relevant staff are aware of the correct use of this and the procedures for replacement
- hazardous substances are stored, transported, handled and used in a safe manner according to manufacturers' instructions and established rules and procedures.

Employees

All employees are responsible for acting in a safe manner whilst at work. By understanding their responsibilities and following our safety rules, they will help the Charity comply with their legal duties and contributing to the safe running of our workplace.

All employees have the responsibility:

- to take reasonable care of our own safety
- to take reasonable care of the safety of others affected by what we do or fail to do
- not to interfere with or misuse, intentionally or recklessly, anything provided in the interests of safety
- to co-operate so that we as individuals and our organisation can fulfil our legal duties e.g. comply with our safety rules
- to set a good personal example in relation to health and safety.

First aid personnel have the responsibility to:

- administer First Aid in accordance with the current legislation and approved code of practice
- record all accidents that are reported to them in the Accident Book
- re-stock first aid boxes at regular intervals and when necessary.

Fire Marshals have the responsibility to carry out the duties for which they are trained when emergency evacuation of the workplace is required.

Arrangements for the management of health and safety

Clare Burgess (CEO) is responsible for the overall health and safety in this organisation. However, everyone in the Charity has responsibilities in relation to health and safety, as set out in this policy.

On a day to day basis the Centre Managers are responsible for the Faversham and the Sittingbourne sites. Any concerns will be escalated to the CEO.

Responsibilities of the employer

The employer is responsible for ensuring that the employee's health and safety is protected in all activities at work. In particular, the employer is responsible for the following:-

- **Ensuring that there is safe and adequate plant and equipment**

The employer will ensure that all plant and equipment is regularly inspected and maintained, in accordance with a maintenance schedule. All repairs will be carried out at the earliest opportunity. If any plant or equipment is judged to be damaged or unsuitable for use for any reason it will be put out of action, with clear signage.

- **Safe premises and place of work**

The employer will ensure that the premises are safe, and that all hazards are removed where possible. If it is not possible to remove a hazard clear signage will be displayed advising employees and any other visitors to the premises of the nature of the hazard and the precautions that should be taken.

- **Competent and safe fellow employees**

The employer will ensure that all employees receive the appropriate training so that they are competent in all their work duties. If any employee acts in a manner that is likely to put others in danger appropriate disciplinary action will be taken.

- **A safe system of work**

The employer will ensure that all processes of work are safe. If there are any hazards the employer will endeavour to remove them. If that is not possible appropriate signage will be displayed advising employees and any other visitors to the premises of the nature of the hazard and the precautions that should be taken.

- **Responsibilities of the employee**

The employee is responsible for ensuring that his/her actions do not cause danger to themselves or to anyone else. The primary responsibilities of the employee include the following.

- **Not to tamper with any equipment**

Employees should not carry out any alterations to equipment which might compromise health and safety. Employees who do tamper with equipment are likely to face disciplinary action, which could include summary dismissal.

- **Not to use any equipment without receiving appropriate training**

No employee should use any equipment without having the appropriate training. The employee is responsible for attending any training that is arranged, and completing any assessments that are required.

- **To take reasonable care of their own health and safety**

Employees are expected to act responsibly and to take care of their own health and safety. This includes wearing any necessary protective clothing and not acting in a dangerous manner. All employees must take care that their actions do not endanger any other employees or visitors to the Charity.

- **To use equipment appropriately**

Employees should use equipment for the purpose for which it is provided, and no other purpose. If any equipment is damaged or unfit for purpose in any way the employee is required to inform the employer immediately.

- **To follow appropriate systems of work**

All employees should follow the systems of work that have been specified by the employer. There should be no deviation from these systems without prior permission from the employer.

- **Personal protective equipment (PPE)**

The employer is responsible for supplying employees with any personal protective equipment (PPE) that is required.

If an employee does not have the appropriate PPE for a specific task then the employee should inform the employer immediately and not perform that task until the PPE is available.

The employee is responsible for taking care of the PPE that has been issued. If any PPE is damaged the employer should be informed immediately.

An employee is required to return all PPE that has been issued on leaving the organisation.

- **Chemicals and other substances**

All chemicals and other substances that are hazardous to health must be stored and used in accordance with the manufacturers' instructions. Such materials will have a COSHH (Control of Substances Hazardous to Health Regulations 2002) label on them, and the guidance on this label must be followed in full.

- **Food Hygiene**

Line managers who have responsibility for food acquisition, storage, processing and serving, and staff induction and hygiene training, are responsible for ensuring that these functions are undertaken to the necessary legal standards. Any suspected outbreak of food poisoning or other unexplained and possibly food related incidents must be reported to the Centre Manager.

- **Risk assessments**

All line managers are required to carry out regular risk assessments of the area and activities under their management. These risk assessments should be carried out annually at least, and some risk assessments will require more regular completion.

The risk assessments should be recorded in writing, with an agreed target date for any actions that have been identified.

If there are any risks that cannot be eliminated all employees working in that area must be made aware.

- **Manual handling**

All employees who are involved in any lifting or carrying must attend training in relation to manual handling. This training must be renewed every two years. The line manager is responsible for ensuring that all employees requiring this training attend the training course at the appropriate time. The employee's training record should also be kept up to date.

- **Accidents**

Although every effort will be made to ensure a safe environment it is accepted that accidents can occur.

If an accident does occur this must be reported immediately to the Centre Manager. It must also be recorded in the accident book.

- If any of the following occur they must be reported to the Health and Safety Executive under the RIDDOR procedures (see www.riddor.gov.uk):
 - Fatal accidents
 - Major injuries
 - Accidents resulting in a period of absence of more than seven days
 - Injuries to the public where they have to be taken to hospital.

In addition, some work-related diseases and dangerous occurrences must be reported to the Health and Safety Executive.

Following any accident the situation will be investigated to determine whether changes need to be made to equipment, training or systems to work so that a similar situation can be prevented in the future.

- **Health and Safety Committee**

A Health and Safety Committee will operated on a bi-monthly basis, with at least one representative from each area of the organisation.

The Committee will be responsible for:

- reviewing all accidents and other incidents relating to health and safety
- reviewing health and safety training
- addressing any other incidents that have been brought to their attention.

Lone Worker and Protection of Staff Policy

Policy Statement

Age UK Faversham and Sittingbourne (AUKFS) recognises that, by the nature of the services we provide, our employees are required to work by themselves in the community without close and direct supervision, sometimes in isolated work areas or out of office hours. Therefore, AUKFS understands that employees working alone and sometimes working in potentially isolated areas could be more at risk of harm. AUKFS also recognises that lone workers need to rely on their own judgment and initiative and may be at greater risk of making mistakes or errors.

For the safety of the workforce anyone using a vehicle for work purposes will be required to have vehicle insurance that includes the wording 'for business purposes'. Copies of annual renewals with this wording will be required for the files. A valid MOT certificate (where applicable) will also be required and held on file.

Policy Aims:

- To minimise risk to our workforce, most of whom are lone workers
- Increase employee awareness of safety issues relating to lone working
- Ensure the risk of lone working is assessed and that safe methods of work are put in place to reduce risk so far as reasonably practicable
- Ensure there are sufficient numbers of suitable employees that have the knowledge, experience, training and skills to support the people who use our services
- Ensure that appropriate support, training and supervision is available that enables them to recognise risk and provides practical advice on safety when working alone
- Ensure that safe 'lone working' is part of the induction process for all new employees
- Encourage full reporting and recording of all adverse incidents relating to lone working
- Reduce any accidents, incidents and injuries relating to lone working
- Put policies and procedures in place to minimise risk and inform employees that it is their duty to ensure they are aware of them, understand and abide by them

Risk Assessment

The assessment of all new referrals includes risk assessments identifying any health and safety issues, either in the home or the location, and any known challenging behaviour such as aggression and violence. If such risks exist the manager may make arrangements for workers to attend in pairs.

Support workers must ensure they have read, understood and follow the Environmental, Movement & Handling and Risk Assessments for each individual client, before they start the service. Risk Assessments are put in place to keep the client and the worker as safe as possible.

Untoward incidents, including those that involve the use of threat, aggression or violence must be regularly reviewed, monitored and risk assessments showing the 'safe practice' updated.

When risk assessing the following must be considered:

- Is the person medically fit and suitable to work alone

- Are there adequate channels for them to contact in case of emergency
- Does the particular home, client or family present a risk to the lone worker
- Does the location present a risk to the lone worker
- Is the route safe for the lone worker
- Does the lone worker understand the reporting and recording arrangements
- Can the whereabouts of the lone worker always be traced whilst working

Lone Worker's Supervision

By definition lone workers are those that work without constant supervision, therefore procedures must be put in place to monitor them to ensure they remain safe. Part of these procedures are regular one-to-one or group check-ins, observational supervisions at the client's home and regular contact between the worker and their Line Manager, either face to face or by telephone.

Supervisions help to ensure the workers understand the risks associated with lone working and how necessary supervisions are. The extent of supervision depends on the risks involved and the ability of the lone worker to identify and handle health and safety issues.

Recording and monitoring

- Lone workers must report incidents such as accidents, or near misses, including all incidents where they have felt threatened, to their Line Manager and in the accident/incident book held in the office. This includes incidents of verbal abuse
- During supervision the supervisor will ask if there are any safety concerns that are not being addressed. Lone workers must seek advice if any safety concerns arise.

Training

- All new employees must read and understand this policy as part of their Induction process.
- All staff will be offered formal Health & Safety training, which will incorporate lone working.

Procedure

Community Based Lone Workers

When working alone in the community it is important to take adequate steps to minimise any risks when travelling to and from work, especially in the hours of darkness.

Before leaving home

- Check your destinations and plan your routes.
- Check you have your charged phone and you have enough fuel.
- Check you have enough money for an emergency call and for parking (if necessary).
- Check you have a torch and alarm (if necessary).

When you arrive and leave

- Take note of where you are, park somewhere well lit, avoid dark alleys, short cuts etc.
- Keep your handbag over your shoulder or out of sight.
- Avoid rowdy groups of people.
- Try to separate your belongings into different pockets.

- Be careful at cash machines.
- Have your keys in your hand as you approach your vehicle or home.
- Look inside the car, including the back seat, before you get in, and lock the car once you are inside.

Office Based Staff

- Office staff that work after office hours must ensure they inform other employees, friends/family of their intention. The main doors must be locked until they leave and keys must be ready to use quickly.
- No-one must be allowed in the office unless they are known.
- If a threatening situation arises the Police must be called immediately – do not investigate yourself.
- When taking new referrals office staff must ask if there are any known risks, if so it may be necessary to double up for the initial visit.
- Employees must contact their Line Manager if there are any emergency situations.
- If whilst visiting they feel threatened or uncomfortable, they must withdraw immediately.

General Procedures for all employees

- Employees must carry the office telephone number and the out-of-hours emergency number at all times whilst working.
- Employees must contact the office immediately if they believe the Risk Assessments are out of date or need amending in any way.
- Employees should use the BLIP lone working system. When a lone worker arrives at and leaves an office, they should blip in and out on the app. If they are out in the community, they should blip in when they arrive at a client and blip out when they leave. They should also blip out at the end of a shift.
- Employees should ensure that family/friends are given the office and emergency numbers
- Employees must wear their identity badges at all times whilst working.
- Employees with mobile phones must ensure their Line Manager has their number so that they can be contacted if necessary.
- Employees without mobile phones must check with each client that they have a telephone or where the nearest phone box is.
- If an employee provides a service to someone with challenging behaviour or where there may be challenging situations (e.g. family problems, the client lives in a very rural or dangerous area etc.) the manager should ensure that the employee is given this information and that they read, understand and follow the appropriate Risk Assessments.
- **If a lone worker feels under immediate threat of violence or harm they must call the Police immediately or call the duty manager (using a pre-agreed distress code word if necessary) who will call the Police on their behalf. If possible the employee must leave immediately. The manager must try to get as much detail as possible to pass onto the Police. The manager will then ensure an incident report has been completed and will risk assess the situation before providing future services.**
- If an employee feels vulnerable, uncomfortable or identifies any risks in a client's home or area they must report this immediately to their line manager who will risk assess the situation.

- Do not carry large amounts of money whilst working.
- Do not carry medicines whilst working.
- Do not leave items on display in your car.
- Do not wear ear phones when walking or returning to your car.
- Employees must be familiar with, and follow, the Emergency Procedures.
- Personal Alarms will be loaned to staff who feel vulnerable, or who are covering calls in certain areas, please ask your Line Manager.
- Employees must carry torches for their own safety.
- All Employees must ensure their Emergency Contacts details are up to date on the HR System.
- Lone workers are advised to carry a small first aid kit suitable for treating minor injuries.
- Employees must ensure all incidents, accidents or near misses are logged in the appropriate places and then monitored.
- Out-of-hours staff must ensure they have names, addresses and phone numbers for all clients and workers.
- If health and safety situations arise the manager must make arrangements for new risk assessments to be put in place and monitored.
- Occasionally a decision may have to be made to terminate services if there is no solution to a health and safety risk to the workforce.
- If any service poses a known risk this must be explained to the support worker.
- If an employee has not turned up for work and has not rung the office to explain then after a reasonable amount of time the office staff must investigate, and, if necessary, inform a member of the Management Team or a Team Leader who may have to inform the Police.

Distress Code

If any employee receives a phone call from a colleague who says "please let the dog out" they must immediately inform a member of the Management Team or a Team Leader. They will ascertain the colleague's whereabouts using BLIP and contact the Police.

Also see: Guidance from Suzy Lamplugh Trust, Emergency Procedures/ Health & Safety Policy/Accidents/Incidents Policy/Dress Policy

Legislation& guidance: Health & Safety at Work Act 1974, Management of Health & Safety at Work Regulations 1999, Skills for Care, General Social Care Council, DOH, SCIE, Health & Safety Exec 5 steps to Risk Assessment

Safeguarding Policy

Introduction

This policy should be read in conjunction with the Multi-Agency Safeguarding Adults Policy, Protocols and Guidance for Kent and Medway 2017. The purpose is to outline the duty and responsibility of staff, volunteers and trustees working on behalf of the Organisation in relation to Safeguarding Adults.

‘It is every adult’s right to live free from abuse in accordance with the principles of respect, dignity, autonomy, privacy and equity’.

The aim of safeguarding is to stop abuse, neglect wherever possible; prevent harm, reduce risk of it happening and enable adults at risk to have choice and control in how they live their lives.

Principles

This policy is based on the conviction that:

- (a) Adults are at risk of abuse in varied forms and allegations must be taken seriously.
- (b) Abuse may be committed by the staff of Organisations providing care or by others who are in a relationship with an adult at risk of abuse.
- (c) Our Organisation has a duty to stop abuse and neglect. Everyone has a responsibility to ensure that a concern about alleged abuse of adults is addressed. Our Organisation has an obligation to work in partnership with The Kent and Medway Safeguarding Adults Board to report incidents or suspected incidents of abuse.

Objectives

- (a) To explain the responsibilities the Organisation and its staff, volunteers and trustees have in respect of adult protection
- (b) To provide staff with an overview of adult safeguarding
- (c) To provide a clear procedure for staff to follow.

We will ensure our staff and volunteers are well trained, supported and enabled to protect adults and children who may be at risk. We will also ensure that the support and care we provide is of the highest standard and take the necessary action when it is not.

Scope

This guidance & procedure is designed to enable everyone who works for Age UK Faversham and Sittingbourne to understand and carry out their responsibilities for safeguarding adults who need care and support and are at risk of, or experiencing, abuse. It reflects the Age UK Faversham and Sittingbourne Safeguarding Policy, the expectations of the Charity Commission Safeguarding Strategy, our Values, or Organisational Quality Standards and forms part of our Corporate Plan.

Our values

At Age UK Faversham & Sittingbourne we believe in being person centred and this will enable us to recognise the signs of abuse with the people who use our services, and their carers, and to facilitate an environment where adults at risk are enabled to speak out when they are a victim of abuse. Being person centred will also assist we can spot the warning signs of abuse and help prevent matters worsening before serious harm occurs.

We believe in excellence and will ensure that all of our staff are well trained and deliver the highest standard of care to help safeguard adults at risk and children.

All Age UK Faversham & Sittingbourne staff will conduct themselves with honesty and integrity, they will always ensure that their actions could never knowingly or unknowingly cause harm to the people who use our services. All applicable staff will ensure that they reveal all relevant details in relation to a Disclosure and Barring Service check.

We also believe in honouring the priorities of those we work for and will ensure that we support them to express their concerns, wishes and needs.

Definitions

Adult at risk – as defined by the Care Act is an adult who:

- is aged 18 and over
- has needs for care and support (whether or not the local authority is meeting any of those needs)
- is experiencing, or at risk of, abuse or neglect
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Child safeguarding – this means:

- protecting children from abuse and maltreatment.
- preventing harm to children's health or development.
- ensuring children grow up with the provision of safe and effective care.
- acting to enable all children and young people to have the best outcomes.

Child protection – the activities undertaken to protect children from harm up to their 18th birthday.

Designated Safeguarding Lead – the named individual who will take overall responsibility for Safeguarding and the implementation of Safeguarding policies within an organisation. For the purpose of this Policy this will be the Chief Executive Officer.

Safeguarding – The Care Act 2014 defines safeguarding as 'protecting an adult's right to live in safety, free from abuse and neglect'. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances'.

Safeguarding Concerns - A safeguarding concern is when a member of staff feels they may have recognised the signs of abuse or potential abuse or have received a disclosure of alleged abuse.

Safeguarding Alert – A safeguarding alert is the first contact between a person concerned about the abuse or neglect and the Local Authority or their representative.

Safeguarding enquiry - The local authority must make (or cause to be made) whatever enquiries it thinks necessary to enable it to decide whether any action should be taken in the adult at risks case and, if so, what and by whom.

Safeguarding Adult Review - A Safeguarding Adults Review (SAR) is a multi-agency review process which seeks to determine what relevant agencies and individuals involved could have done differently that could have prevented harm or a death from taking place. The purpose of a SAR is not to apportion blame.

KASAF – Kent Adult Safeguarding Alert Form

DBS – Disclosure and Barring Service

Disclosure – when an adult at risk, or other connected individual, informs someone of possible abuse that has taken place or could take place.

Related Policies

- Managing Capability policy
- Whistle blowing policy
- Mental Capacity Policy and procedure
- Deprivation of Liberty Safeguards (DOLS) Policy
- Confidentiality Policy
- Safer Recruitment Policy

Policy

All Age UK Faversham & Sittingbourne staff and volunteers will be vigilant to the signs of abuse and take the appropriate action if a disclosure is made or they observe abuse or potential abuse taking place. The organisation will ensure it meets all its legal and statutory obligations in relations to protecting people from abuse.

Age UK Faversham & Sittingbourne staff will adhere to the six safeguarding principles that are stated in the Care Act 2014. They are:

1. **Empowerment** - People being supported and encouraged to make their own decisions and informed consent.
2. **Prevention** - It is better to take action before harm occurs.
3. **Proportionality** - The least intrusive response appropriate to the risk presented.
4. **Protection** - Support and representation for those in greatest need.
5. **Partnership** - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
6. **Accountability** - Accountability and transparency in safeguarding practice.

In line with Kent and Medway Safeguarding Board protocols and the local multi-agency agreements Age UK Faversham & Sittingbourne will aim to prevent abuse or neglect wherever possible; prevent harm and reduce risk of it happening and enable adults at risk to have choice and control in how they live their lives.

We will also:

- Promote an approach that concentrates on improving life for the adults concerned.
- Raise awareness of safeguarding with the people who use our services and the public.

- Enable people affected by dementia to help prevent, identify and respond to abuse and neglect.
- Provide accessible information about types of abuse, staying safe, raising concerns and addressing cause.
- Ensure roles & responsibilities are clear.
- Have clear risk management procedures that promote freedom and wellbeing.
- Clarify our responses to safeguarding concerns derived from poor quality care; inadequacy of service provision & patient safety, should be responded to.
- Recognise importance of recording and sharing information to show patterns of abuse.
- Be vigilant to the signs of child abuse and know how to report it.
- Have a named person who will take responsibility for ensuring best practice, advising staff and volunteers on safeguarding matters and collating data about our safeguarding referrals.

Roles & Responsibilities

All staff and volunteers

Every individual working for Age UK Faversham & Sittingbourne, irrespective of their role, has a part to play in safeguarding children and adults who need care and support from abuse. All staff and volunteers will undertake training in and must familiarise themselves with our Safeguarding Policy, Guidance and Procedures.

Trustees

Charity trustees serve on the governing body of Age UK Faversham & Sittingbourne and have responsibility for the general control and management of the administration of the charity. The Charity Commission states that trustees of charities which work with children and adults who need care and support have a duty of care to their charity, which includes taking the necessary steps to safeguard those at risk from abuse, managing risk and protecting the reputation of the charity. Trustees may suggest areas of focus for Safeguarding scrutiny and action.

Chief Executive and Senior Management Team

Age UK Faversham & Sittingbourne's senior leadership has a responsibility to ensure that safeguarding is included, where appropriate, in the strategic plans, risk assessments, communications and quality assurance processes. In some cases, they will be required to make decisions in relation to complex or serious safeguarding concerns, in consultation with the Trustees. Age UK Faversham & Sittingbourne's senior leadership team are responsible for ensuring that they, and the staff and volunteers that they supervise, are aware of Age UK Faversham & Sittingbourne's safeguarding policy and procedures and access relevant training. They should promote the discussion of safeguarding at team meetings and as part of supervision or one to one meeting. They may be required to make decisions relating to complex or serious safeguarding concerns and can seek advice from Age UK's Head of Safeguarding via Partnership Affairs where required.

Designated Person for Safeguarding

The Chief Executive is the Designated Person for Safeguarding at Age UK Faversham & Sittingbourne. They are responsible for developing and quality assuring safeguarding activity across Age UK Faversham & Sittingbourne.

In addition to the above:

Age UK Faversham & Sittingbourne will ensure that all relevant people;

- Receive the appropriate training and guidance and have access to learning events. This is usually on an annual basis in line with KCC's requirements.
- Are well supported and have the appropriate line management and supervision.
- Know how to respond and where to go for advice and assistance.
- Understand the importance of balancing choice and control with safety.
- Know about the different types of abuse and neglect.
- Support people to keep safe and know what preventative action can be taken.
- Know who to tell about suspected abuse and what to do if someone is in danger.
- Appoint a Designated Safeguarding Lead, who will be the senior safeguarding Lead.

Age UK Faversham & Sittingbourne will have systems in place to;

- Recruit employees and volunteers in line with the requirements of the Disclosure and Barring Service.
- Ensure all staff receive training in safeguarding to recognise, record and report any concerns, disclosures or observations of abuse or suspected abuse.
- Work in partnership with the local safeguarding team.
- Take steps to prevent abuse and neglect.
- Discuss safeguarding concerns in supervisions and team meetings.
- Monitor the work standards of all staff and ensure they understand the implication of any acts of omission.
- Deal with allegations of abuse against our employees or volunteers.
- Take appropriate action where any of employees or volunteers are suspected of abuse.
- Work in accordance with local multi-agency safeguarding arrangements and comply fully with any statutory or non-statutory enquiries or Safeguarding Adult Reviews.
- Provide the people who use our services with information on how to protect themselves from abuse and raise safeguarding concerns.
- Have a robust and effective whistleblowing policy.
- Monitor and review all Safeguarding alerts to highlight trends or improvements that can be made.
- Ensure all digital service delivery is conducted in a manner that protects people from abuse.

Age UK Faversham & Sittingbourne will appoint a Designated Safeguarding Lead who will;

- Be the first point of call for any safeguarding alerts.
- Ensure the safeguarding policy and procedures are correctly implemented.
- Monitor the effectiveness of safeguarding training.
- Build links with the local Safeguarding Teams.
- Collate and monitor data on all safeguarding alerts which will be reported to the Board of Trustees.

Service Users with a Disability

Age UK Faversham & Sittingbourne are committed to ensuring that people growing older with learning disabilities, and other conditions, have the same access to care and support as everyone else. In line with the Equality Act 2010, this must be based on their needs and irrespective of any protected characteristics such as:

- Age
- Being or becoming a transsexual person
- Being married or in a civil partnership
- Being pregnant or having a child
- Disability
- Race including colour, nationality, ethnic or national origin
- Religion, belief or lack of religion/belief
- Sex
- Sexual orientation

Age UK Faversham & Sittingbourne will ensure that care and support for people with disabilities is tailored to their needs, strengths and preferences and is not determined solely by their age or disability.

Further information can be sought here:

<https://www.nice.org.uk/guidance/ng96/chapter/recommendations>

Mental Capacity

Please refer to the separate Mental Capacity Policy

Deprivation of Liberty Safeguards (DOLS)

Please refer to the separate DOLS Policy

Priority for Raising Concerns and Making Decisions

The Organisation is committed to ensuring the safety and care of adults and children and all staff and volunteers have a professional and moral duty to immediately report any witnessed or suspected abuse to their line manager. If there is sufficient cause for concern, the line manager will ensure that the information is referred immediately to Social Care.

Staff should be aware that if they have concerns that their managers may be implicated, they have grounds for thinking that the manager will not take the matter seriously or act appropriately to protect clients, they fear intimidation or have immediate concerns for their own or for a client's safety they can approach Kent County Council Social Services or the Police directly.

Age UK Faversham & Sittingbourne will take vigorous action against anyone trying to suppress a possible report of abuse and respond positively to reports on matters of poor care or malpractice as identified in the Raising Concerns at Work Policy - "Whistle Blowing"

Sharing Information, Consent and Making Safeguarding Personal

Confidentiality is an important principle that enables people to feel safe in sharing their concerns and to ask for help. However, the right to confidentiality is not absolute. Sharing relevant information with the right people at the right time is vital to good safeguarding practice. All staff and volunteers should be familiar with this policy and procedures for raising concerns.

Some basic principles:

- Don't give assurances about absolute confidentiality.
- Try to gain consent to share information as necessary.
- Consider the person's mental capacity to consent to information being shared and seek assistance if you are uncertain.
- Make sure that others are not put at risk by information being kept confidential.
- Does the public interest served by disclosure of personal information outweigh the public interest served by protecting confidentiality?
- Could your action prevent a serious crime?
- Don't put management or organisational interests before safety.
- Share information on a 'need-to-know' basis and do not share more information than necessary.
- Record decisions and reasoning about information that is shared.
- Carefully consider the risks of sharing information in relation to domestic violence or hate crime.

Our employees and volunteers will assume it is their responsibility to raise a safeguarding concern if they believe an adult at risk or a child is suffering or likely to suffer abuse or neglect, and/ or are at risk to themselves or another, rather than assume someone else will do so. We will work in a transparent and open way with anyone who makes a disclosure or where we suspect abuse but will promote best practice of gaining consent before alerting the local authority. **All staff should always report their safeguarding concerns to their line manager**, coordinator or senior manager and if someone is hurt or in immediate danger, the emergency services should be called. All Safeguarding Concerns should also be discussed with the Designated Safeguarding Lead.

Adults may not give their consent, to the sharing of safeguarding information, for a number of reasons. For example, they may be unduly influenced, coerced or intimidated by another person, they may be frightened of reprisals, they may fear losing control, they may not trust social services or other professionals, or they may feel their relationship with the abuser will be damaged. Reassurance and appropriate support may help to change their view on consent. Where consent has not been given staff and volunteers should:

- Explore the reasons for the adult's objections.
- Explain the concern and why you think it should be reported.
- Tell the adult who you will be sharing information with and assure them that it will only be shared with people who need to know.
- Discuss the consequences to the adult and others of not sharing the information.
- Reassure them that they have not done anything wrong and there is support available to them.

If the adult still refuses to give consent for information to be shared staff and volunteers should discuss with their line manager, coordinator, senior or a member of the senior

leadership team and the details of the concern should be recorded and the subsequent decisions (see recording concerns). In general, the individuals wish should be respected, however, there are some circumstances where staff can reasonably override such a decision, including:

- The adult lacks the mental capacity to make the decision – this must be properly explored and recorded in line with the Mental Capacity Act.
- There is a need to contact the emergency services.
- Other people may be at risk.
- Sharing the information could prevent a crime.
- A serious crime has been committed.
- The risk is unreasonably high
- Staff or volunteers are implicated
- There is a court order or other legal authority for acting without consent

All Child Protection issues will be reported to the Local Authority.

Advocacy

The Care Act 2014 requires that the Local Authority must arrange for an independent advocate to represent and support for an adult who is the subject of a safeguarding enquiry or Safeguarding Adult Review where the adult has 'substantial difficulty' in being involved in the process and where there is no other 'appropriate person' to represent and facilitate their involvement. Age UK Faversham & Sittingbourne staff and volunteers will ensure they make the Local Authority aware when the person they are raising a safeguarding alert is likely to have substantial difficulty and have no appropriate person to help support them.

Substantial difficulty is set out in The Care Act:

- Does the individual need support to understand the relevant information?
- Can they retain the information?
- Do they have substantial difficulty making decisions because of difficulties understanding the options open to them?
- Do they have difficulties communicating their views, wishes and feelings?

Advocates have 2 roles:

- To support the individual with understanding the safeguarding process.
- To ensure the individuals voice is heard and the safeguarding process takes account of their views.

Advocacy for Carers

If a carer experiences intentional or unintentional harm from the adult they are supporting, or if a carer unintentionally or intentionally harms or neglects the adult they support, consideration should be given to whether the carer may need to have independent representation or advocacy and Age UK Faversham & Sittingbourne staff and volunteers should again make the Local Authority aware of this.

Abuse

What do we mean by abuse?

“Abuse is a violation of an individual’s human and civil rights by any other person or persons”.

People with care and support needs are more likely to be abused or neglected. They may be seen as an easy target and may be less likely to identify abuse themselves or to report it. People with communication difficulties can be particularly at risk because they may not be able to alert others. Sometimes people may not even be aware that they are being abused, and this is especially likely if they have a cognitive impairment. Abusers may try to prevent access to the person they abuse.

It is the duty of all members of staff and volunteers of Age UK Faversham & Sittingbourne to be vigilant regarding the welfare of clients. All staff and volunteers will be trained to recognise the signs of abuse. If they suspect, observe or receive a disclosure of abuse they should follow the procedures outlined in this policy and discuss, as soon as practically possible, their concerns with their line manager (or relevant Senior / Coordinator), or a member of the Senior Leadership Team.

Abuse may take the following forms:

- Physical abuse
- Sexual abuse
- Psychological abuse
- Exploitation
- Financial abuse
- Neglect and acts of omission
- Self- Neglect or self-injurious behaviour
- Discrimination
- Organisational Abuse
- Multiple forms of Abuse
- Domestic Abuse
- Inappropriate Restraint
- Hate Crime
- Modern Slavery or Human Trafficking
- Forced Marriage
- Female Genitalia mutilation (FGM)

See Appendix 1 for more details.

Recruitment

Age UK Faversham & Sittingbourne takes great care in the recruitment of staff and carries out all possible checks on recruits to ensure that as far as is possible staff have no criminal history that would affect their ability to provide safe support to our clients. Age UK Faversham and Sittingbourne also co-operates in all Government initiatives regarding the sharing of information on staff who are found to be unsuitable to work with adults and children at risk of abuse.

Staff/volunteers who are suspected/ accused of abuse

Age UK Faversham & Sittingbourne has a zero-tolerance policy to abuse, neglect, discrimination and restraint. Where staff are accused or suspected of abuse it will be

investigated fully (in line with our Managing Performance Policy), staff may have to be suspended or put on alternative duties whilst the investigation takes place. Staff and volunteers will be supported through this process and any investigation will not be seen as a presumption of guilt. If the investigation is being conducted by another party the employee may be suspended or put on alternative duties.

Where staff have been found to have carried out abuse or neglect the appropriate authorities will be contacted. This will include the Local Authority, Police, Care Quality Commission and Disclosure and Barring Service.

Digital Safeguarding

At Age UK Faversham & Sittingbourne we deliver our services in a way that makes them as accessible as possible, to the people that need them. This involves delivering services via online platforms, using social media and group messaging.

Where we deliver group services via an online platform we will always use a platform that has security features including a waiting room or passcode for entry. All participants will be made aware of the protocols of making sure they have the screen on to ensure that the facilitator of the session can see who is in the room and detect any non-verbal clues that might give an indication of welfare/safety concerns. All online services will only commence once a documented assessment of risk is carried out.

Any member of staff identifying a safeguarding concern via an online platform will follow our usual reporting procedures.

Procedures

All staff will ensure they understand Age UK Faversham & Sittingbourne's procedures for dealing with safeguarding concerns and managers will ensure that this is periodically reviewed with team members.

Recognising abuse

If an Age UK Faversham & Sittingbourne employee or volunteer has a safeguarding concern they should;

- Listen to what is being said and reassure the person that they are doing the right thing.
- Not attempt to investigate or lead a person into saying something.
- Take notes about what was said and observed, as soon as it is appropriate to do so.
- Report as soon as possible to their line manager, coordinator, senior to discuss what next steps should be taken.
- Where there is not enough evidence to suggest that abuse has taken place or will take place but a member of staff or volunteer has concerns about a person's safety they should record their concern on a Safeguarding Record form and discuss as soon as possible with their line manager. This should then be given to the Designated Safeguarding Lead who will record it in the organisations Safeguarding file.
- If a member of staff or volunteer does not feel line manager/ on call/ role manager has taken sufficient action, then a member of the Senior Leadership Team or Trustee should be notified.

Recording abuse

Age UK Faversham & Sittingbourne will demonstrate the highest standards in record keeping and ensure that where any member of staff or volunteer has a safeguarding concern they keep accurate and factual notes. Staff will use the Safeguarding Form (Appendix 2) and body map (Appendix 3) when they have a safeguarding concern. All concerns should be clearly documented even when it is not appropriate to report to the local authority. When this document is not available staff should write clearly on note paper and ensure that their contemporaneous notes are retained, dated and signed.

Safeguarding recording tips:

- Write a record of what has happened as quickly as practicably possible after the concern has first been presented.
- Write clearly in black ink.
- Only record what has happened or been observed and do not pass any opinion.
- Where a disclosure has been made, record what is said but it is not necessary to quote all of what a person has told you.
- Where an individual tells you what they want because of their disclosure record this, so it can be reported to the Local Authority in line with Making safeguarding personal protocols.

Tell the person that:

- They did the right thing to tell you
- You are treating the information seriously
- The alleged abuse was not their fault
- You have to inform the appropriate person
- You and Age UK Faversham and Sittingbourne will take steps to protect and support them.
- If an adult - Ask them what they would like to happen

You must:

- Use open questions, such as “Can you tell me what happened/ Can you tell me what was said/ Can you describe that to me?”
- Report to your line manager who will report to social services, or police (or CQC in a regulated setting) as soon as possible, certainly within 24 hours.
- Quickly record what was said, using exact words and phrases with ink that can be photocopied
- Describe the circumstances in which the disclosure came about
- Note the setting and anyone else who was there at the time
- Record factual information not opinion
- Be aware that your report may be required later as part of a legal action or disciplinary procedure.

You must not:

- Press the person for more details
- Interrupt when a person is freely recalling significant events ;(e.g. don't say “hold on we'll come back to that later”) as they may not say it again.
- Ask leading questions that could be interpreted as putting words or suggestions forward.

- Promise to keep secrets because this information cannot be kept a secret but can be managed confidentially.
- Make promises you can't keep (such as "This will never happen to you again")
- Contact or confront an alleged abuser
- Start an investigation on your own
- Be judgemental (for example "Why didn't you run away")
- Pass on information to anyone other than those with a legitimate 'need to know,' such as your line manager or other appropriate person.

Reporting Abuse

Procedure to use In the Event of an Allegation or Disclosure.

This procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that an adult at risk of abuse has been abused within 48 hours of the above being disclosed. Promises of confidentiality must not be given as this may conflict with the need to ensure the safety and welfare of the individual.

- a) The Chief Officer or Senior Departmental Manager on duty must be informed immediately.
- b) The Senior Departmental Manager should contact KCC Social Services on 03000 41 61 61 and have a Pre-Referral Consultation discussion. It is essential that following the consultation, clarity exists regarding the Social Service decision to make enquiries or not and if we should proceed with the disclosure referral. It is also important to establish if the adult is known to a Social Care Health and Wellbeing Case Management Team.
- c) The Senior Departmental Manager must maintain a full Organisational record as to the nature of the allegation, the name and position of the person to whom the matter was reported, the dates and times any actions are taken. Information regarding any Pre-Referral Consultation, who was consulted, decisions made and recommendations given. If required a copy of the Kent Adult Safeguarding Alert Form should also be retained along with acknowledgement of its receipt. A copy should also be kept in the clients file.
- d) Complete a Kent Adult Safeguarding Alert Form (KASAF) (Appendix 4) This can be completed on the computer using the word programme or by hand. (See Appendices 5a and 5b for guidance about completing the form) All documents required for reporting purposes are stored within the organisations Safeguarding file and can be found online.

www.kent.gov.uk/social-care-and-health/information-for-professionals/adult-safeguarding/adult-protection-forms

- e) The KASAF must be completed as fully as possible and include;
 1. Name, personal, contact and next of kin details of the adult.
 2. Whether the adult or their representative is aware that the referral is being made, unless it is unsafe for the client to be told, they should be informed.
 3. Full details about the allegation, including the date, the time, and the place where the alleged abuse happened also include Information about the adult's care and support needs and why you are making the referral.
 4. Any mental capacity assessments that have been undertaken or if any Deprivation of Liberty safeguards are in place.
 5. Any other significant family members involved in caring or supporting the client.

6. Any professionals involved in supporting the adult. E.g. GP, District Nurses, Mental Health workers.
 7. Have you consulted with a Case Manager or Central Duty Team so that an immediate risk reduction plan could be put in place?
 8. Record in their own words what they would like to happen.
 9. Details of any medical attention sought. Describe details of any physical injuries. The use of a body map may be useful. (Appendix 3)
 10. Identify the main and all types of abuse involved.
 11. The current situation of the adult you are concerned for.
 12. Details of the alleged perpetrator/Organisation. Consider what actions may be needed if the alleged perpetrator lives with the adult, is a carer for others or may pose a risk to children or other adults with care and support needs.
 13. An explanation as to your views on whether the adult continues to be at risk from harm.
 14. A view on whether the alleged perpetrator poses a risk to others.
 15. A view on whether the alleged perpetrator is a danger to staff undertaking the safeguarding investigation.
 16. In circumstances where there is further risk of violence to the adult provide a safe point of contact so that investigators do not inadvertently make contact in an inopportune time.
 17. Your personal details and how you or a colleague can be contacted in your absence.
 18. Full details of the person if the information was provided by someone else and if they wish to remain anonymous.
- If there is information you do not know record “not known”
 - It may not be possible to supply all this information straight away and the sending of the form should not be held up. Missing information will be captured later by those carrying out further investigations.
 - If the adult is not known to a Social Care Health and Wellbeing Case Management Team send the form to the Central Duty Team
 - If the adult is known to a Social Care Health and Wellbeing Case Management Team, please send the form directly to that team.
 - Completed forms should be password protected and password details sent in a separate e-mail.

From the information provided the designated officer will assess if the case reaches the criteria for a statutory section 42 enquiry. The criteria are for an adult who is believed to:

- Be experiencing, or at risk of abuse or neglect; AND
- Have needs for care AND support (whether or not the local authority is meeting any of those needs); AND
- As a result of those care AND support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

The local authority is not required by law to carry out enquiries on behalf of adults who do not meet the Statutory section 42 enquiry criteria but may do so at their own discretion. Such enquiries are known as a non-statutory safeguarding enquiry.

If a decision is made not to proceed with an enquiry a referrer will be informed. The client will be offered other appropriate support to meet their needs.

Action in Emergency Situations

If necessary emergency services should be called before any other action is taken, giving due regard for the individual's (who is calling the emergency services) own personal safety.

Where an adult at risk or their carer are in immediate danger of harm the Police should be called using 999. If the adult at risk has already been hurt and requires immediate medical attention an ambulance should be called on 999. Age UK Faversham & Sittingbourne staff and volunteers should contact their line manager/ on call/ role manager as soon as possible if they find themselves in this situation for guidance and support.

Many instances of abuse will constitute a criminal offence. Appropriate intervention must consider that this may lead to criminal proceedings. Alleged criminal offences differ from all other non-criminal forms of abuse in that the responsibility for initiating investigative action rests with the Police and decisions regarding prosecution are the responsibility of the Crown Prosecution Service but all Safeguarding Concerns should still be reported to the local authority in the first instance.

Other records that are relevant to safeguarding are:

- Risk assessments.
- Care plans.
- Observations.
- Financial transactions
- Complaints.
- Medication administration records.
- Rosters and logs.
- Training, supervision and appraisal.

Children

Where a member of staff or volunteer has a concern about a child they should call Kent County Council on 03000 41 11 11. Staff can also call 01634 33 44 66 or out of hours 03000 41 91 91.

Care Quality Commission (CQC) notification

ADSS have legal obligation to report any abuse or allegations of abuse to the Care Quality Commission where the adult at risk or the perpetrator is a user of our registered service. Any safeguarding concerns that relate to a service user of Support at Home + should be brought immediately to the Registered Managers attention so they can report it to the CQC.

Care Act Duty of Candour

Age UK Faversham & Sittingbourne recognises the regulations under the Care Act place a duty of candour on all service providers registered with the Care Quality Commission. We will:

- Act with transparency and honesty when things go wrong.
- Tell the person concerned when something has gone wrong as soon as possible and provide support to them.
- Give an apology and keep the person informed about any further enquiries.

Transporting Service Users at risk of abuse

- Before picking someone up for the first time, make sure that you check with the service co-ordinator in case there is important information you need to know to ensure the safety of the service user and yourself
- Operate locks whilst in transit. If service user(s) must be left alone in the vehicle for any length of time, lock the doors to ensure their safety. Do not leave the vehicle unattended if you feel it is not safe to do so
- Services users with conditions such as dementia can often find the start and end of the day difficult and may be anxious if they can't quite remember where they're going, if they're expected etc. You may need to offer appropriate reassurance
- During the journey it helps if you mention where you are taking the person, pointing out the route as you go. Short-term memory problems may mean that previous information has slipped their mind. They may need your ongoing reassurance.

Training

All relevant staff and volunteers will be trained as part of their induction and this will be renewed every year. Staff will also be invited to attend practice workshops and encouraged to attend any Local Authority training that is available.

Other related documents

https://www.cqc.org.uk/sites/default/files/20180209_SC121706_CQC_safeguarding_state_ment_February_2018_v2_0.pdf

https://www.kent.gov.uk/_data/assets/pdf_file/0018/11574/Multi-Agency-Safeguarding-Adults-Policy,-Protocols-and-Guidance-for-Kent-and-Medway.pdf

<https://www.skillsforcare.org.uk/Documents/Topics/Safeguarding/A-guide-to-adult-safeguarding-for-social-care-providers.pdf>

Appendix 1 – Types and indicators of abuse

Source scie.co.uk

<https://www.scie.org.uk/publications/ata glance/69-adults-safeguarding-types-and-indicators-of-abuse.asp>

Type of abuse	
Physical abuse <ul style="list-style-type: none">• Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing• Rough handling• Scalding and burning• Physical punishments• Inappropriate or unlawful use of restraint• Making someone purposefully uncomfortable (e.g. opening a window and removing blankets)• Involuntary isolation or confinement• Misuse of medication (e.g. over-sedation)• Forcible feeding or withholding food• Unauthorised restraint, restricting movement (e.g. tying someone to a chair)	Indicators of physical abuse <ul style="list-style-type: none">• No explanation for injuries or inconsistency with the account of what happened• Injuries are inconsistent with the person's lifestyle• Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps• Frequent injuries• Unexplained falls• Subdued or changed behaviour in the presence of a particular person• Signs of malnutrition• Failure to seek medical treatment or frequent changes of GP
Domestic violence or abuse <ul style="list-style-type: none">• Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to:<ul style="list-style-type: none">• psychological• physical• sexual• financial• emotional.• Domestic violence and abuse include any incident or pattern of incidents of controlling, coercive or 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.• Coercive or controlling behaviour is a core part of domestic	Indicators of domestic violence or abuse <ul style="list-style-type: none">• Low self-esteem• Feeling that the abuse is their fault when it is not• Physical evidence of violence such as bruising, cuts, broken bones• Verbal abuse and humiliation in front of others• Fear of outside intervention• Damage to home or property• Isolation – not seeing friends and family• Limited access to money

<p>violence. Coercive behaviour can include:</p> <ul style="list-style-type: none"> • acts of assault, threats, humiliation and intimidation • harming, punishing, or frightening the person • isolating the person from sources of support • exploitation of resources or money • preventing the person from escaping abuse • regulating everyday behaviour. 	
<p>Sexual abuse</p> <ul style="list-style-type: none"> • Rape, attempted rape or sexual assault • Inappropriate touch anywhere • Non- consensual masturbation of either or both persons • Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth • Any sexual activity that the person lacks the capacity to consent to • Inappropriate looking, sexual teasing or innuendo or sexual harassment • Sexual photography or forced use of pornography or witnessing of sexual acts • Indecent exposure 	<p>Indicators of sexual abuse</p> <ul style="list-style-type: none"> • Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck • Torn, stained or bloody underclothing • Bleeding, pain or itching in the genital area • Unusual difficulty in walking or sitting • Foreign bodies in genital or rectal openings • Infections, unexplained genital discharge, or sexually transmitted diseases • Pregnancy in a woman who is unable to consent to sexual intercourse • The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude • Incontinence not related to any medical diagnosis • Self-harming • Poor concentration, withdrawal, sleep disturbance • Excessive fear/apprehension of, or withdrawal from, relationships • Fear of receiving help with personal care • Reluctance to be alone with a particular person
<p>Psychological or emotional abuse</p> <ul style="list-style-type: none"> • Enforced social isolation – preventing someone accessing 	<p>Indicators of psychological or emotional abuse</p>

<p>services, educational and social opportunities and seeing friends</p> <ul style="list-style-type: none"> • Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance • Preventing someone from meeting their religious and cultural needs • Preventing the expression of choice and opinion • Failure to respect privacy • Preventing stimulation, meaningful occupation or activities • Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse • Addressing a person in a patronising or infantilising way • Threats of harm or abandonment • Cyber bullying 	<ul style="list-style-type: none"> • An air of silence when a particular person is present • Withdrawal or change in the psychological state of the person • Insomnia • Low self-esteem • Uncooperative and aggressive behaviour • A change of appetite, weight loss/gain • Signs of distress: tearfulness, anger • Apparent false claims, by someone involved with the person, to attract unnecessary treatment
<p>Financial or material abuse</p> <ul style="list-style-type: none"> • Theft of money or possessions • Fraud, scamming • Preventing a person from accessing their own money, benefits or assets • Employees taking a loan from a person using the service • Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions • Arranging less care than is needed to save money to maximise inheritance • Denying assistance to manage/monitor financial affairs • Denying assistance to access benefits • Misuse of personal allowance in a care home • Misuse of benefits or direct payments in a family home 	<p>Indicators of financial or material abuse</p> <ul style="list-style-type: none"> • Missing personal possessions • Unexplained lack of money or inability to maintain lifestyle • Unexplained withdrawal of funds from accounts • Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity • Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so • The person allocated to manage financial affairs is evasive or uncooperative • The family or others show unusual interest in the assets of the person • Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA

<ul style="list-style-type: none"> Someone moving into a person's home and living rent free without agreement or under duress False representation, using another person's bank account, cards or documents Exploitation of a person's money or assets, e.g. unauthorised use of a car Misuse of a power of attorney, deputy, appointeeship or other legal authority Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship 	<ul style="list-style-type: none"> Recent changes in deeds or title to property Rent arrears and eviction notices A lack of clear financial accounts held by a care home or service Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house Unnecessary property repairs
<p>Modern slavery</p> <ul style="list-style-type: none"> Human trafficking Forced labour Domestic servitude Sexual exploitation, such as escort work, prostitution and pornography Debt bondage – being forced to work to pay off debts that realistically they never will be able to 	<p>Indicators of modern slavery</p> <ul style="list-style-type: none"> Signs of physical or emotional abuse Appearing to be malnourished, unkempt or withdrawn Isolation from the community, seeming under the control or influence of others Living in dirty, cramped or overcrowded accommodation and or living and working at the same address Lack of personal effects or identification documents Always wearing the same clothes Avoidance of eye contact, appearing frightened or hesitant to talk to strangers Fear of law enforcers
<p>Discriminatory abuse</p> <ul style="list-style-type: none"> Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010) Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic 	<p>Indicators of discriminatory abuse</p> <ul style="list-style-type: none"> The person appears withdrawn and isolated Expressions of anger, frustration, fear or anxiety The support on offer does not take account of the person's individual needs in terms of a protected characteristic


<ul style="list-style-type: none"> • Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader • Harassment or deliberate exclusion on the grounds of a protected characteristic • Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic • Substandard service provision relating to a protected characteristic 	
<p>Organisational or institutional abuse</p> <ul style="list-style-type: none"> • Discouraging visits or the involvement of relatives or friends • Run-down or overcrowded establishment • Authoritarian management or rigid regimes • Lack of leadership and supervision • Insufficient staff or high turnover resulting in poor quality care • Abusive and disrespectful attitudes towards people using the service • Inappropriate use of restraints • Lack of respect for dignity and privacy • Failure to manage residents with abusive behaviour • Not providing adequate food and drink, or assistance with eating • Not offering choice or promoting independence • Misuse of medication • Failure to provide care with dentures, spectacles or hearing aids • Not taking account of individuals' cultural, religious or ethnic needs • Failure to respond to abuse appropriately • Interference with personal correspondence or communication 	<p>Indicators of organisational or institutional abuse</p> <ul style="list-style-type: none"> • Lack of flexibility and choice for people using the service • Inadequate staffing levels • People being hungry or dehydrated • Poor standards of care • Lack of personal clothing and possessions and communal use of personal items • Lack of adequate procedures • Poor record-keeping and missing documents • Absence of visitors • Few social, recreational and educational activities • Public discussion of personal matters • Unnecessary exposure during bathing or using the toilet • Absence of individual care plans • Lack of management overview and support

<ul style="list-style-type: none"> • Failure to respond to complaints 	
<p>Neglect and acts of omission</p> <ul style="list-style-type: none"> • Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care • Providing care in a way that the person dislikes • Failure to administer medication as prescribed • Refusal of access to visitors • Not taking account of individuals' cultural, religious or ethnic needs • Not taking account of educational, social and recreational needs • Ignoring or isolating the person • Preventing the person from making their own decisions • Preventing access to glasses, hearing aids, dentures, etc. • Failure to ensure privacy and dignity 	<p>Indicators of neglect and acts of omission</p> <ul style="list-style-type: none"> • Poor environment – dirty or unhygienic • Poor physical condition and/or personal hygiene • Pressure sores or ulcers • Malnutrition or unexplained weight loss • Untreated injuries and medical problems • Inconsistent or reluctant contact with medical and social care organisations • Accumulation of untaken medication • Uncharacteristic failure to engage in social interaction • Inappropriate or inadequate clothing
<p>Self-neglect</p> <ul style="list-style-type: none"> • Lack of self-care to an extent that it threatens personal health and safety • Neglecting to care for one's personal hygiene, health or surroundings • Inability to avoid self-harm • Failure to seek help or access services to meet health and social care needs • Inability or unwillingness to manage one's personal affairs 	<p>Indicators of self-neglect</p> <ul style="list-style-type: none"> • Very poor personal hygiene • Unkempt appearance • Lack of essential food, clothing or shelter • Malnutrition and/or dehydration • Living in squalid or unsanitary conditions • Neglecting household maintenance • Hoarding • Collecting a large number of animals in inappropriate conditions • Non-compliance with health or care services • Inability or unwillingness to take medication or treat illness or injury

Source SCIE Types and Indicators of abuse

Appendix 2 – Safeguarding Form

Date:	Name of client:
Date of observation/ disclosure/ concern:	Form completed by:

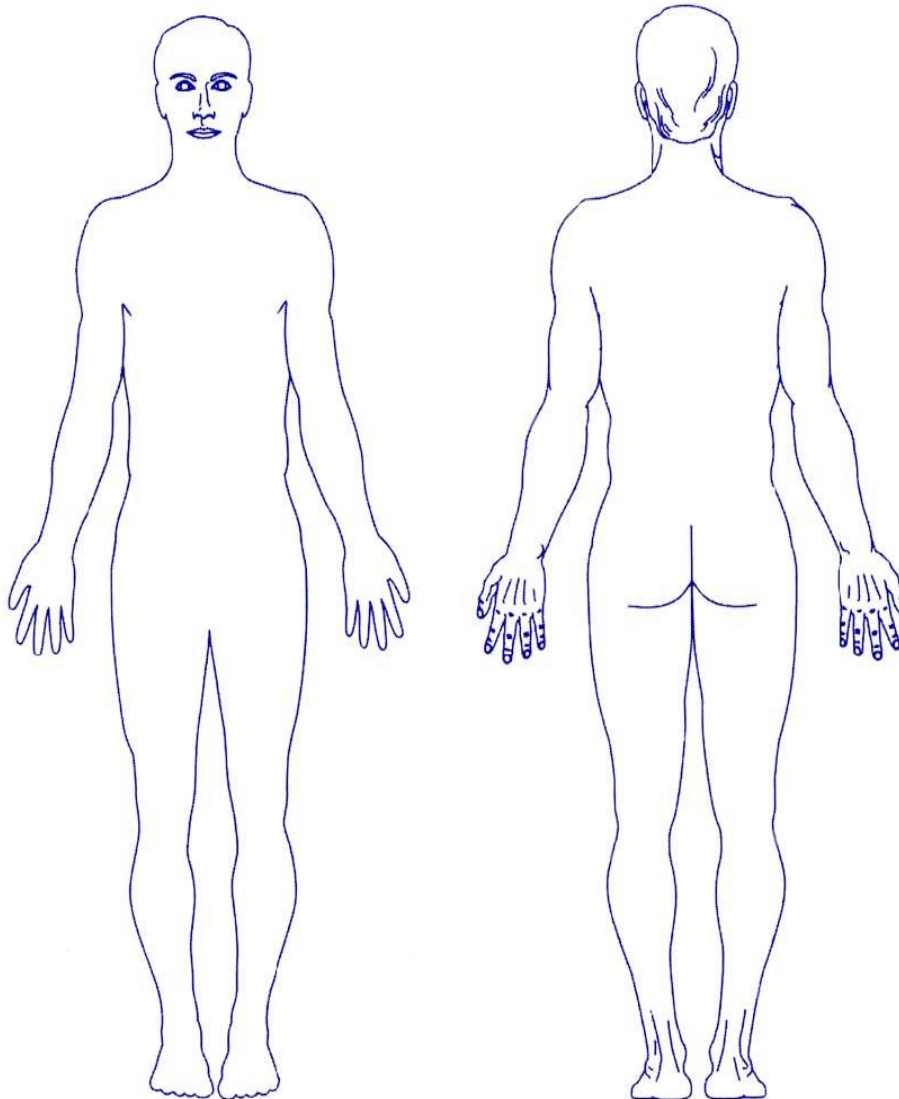


Signature:	Date:
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Appendix 3 – Body Map

Client name:	Form completed by:
Date:	Signature:

Please mark any noticeable marks that you may have seen on the body of the adult giving rise to this concern. Please describe injury(ies)



Appendix 4 – Kent Adult Safeguarding Alert Form

See separate document that is available from your Volunteer Service Lead.

Appendix 5a and 5b – Guidance documents for completing KASAF

See separate documents that is available from your Volunteer Service Lead.

Volunteering Policy

Introduction

The aim of Age UK Faversham & Sittingbourne is to identify need and work closely with statutory and other voluntary bodies to provide services to support older people in accordance with the service principles of the Organisation.

In Age UK Faversham & Sittingbourne we are committed to involving a diverse range of local people in our work in both formal volunteering and community activity. We do this because we believe that:

- Volunteers, in their diversity of age, experience, cultural background and their involvement within the community, bring to our work a value which adds to our understanding of and response to older people's needs.
- Through the involvement of volunteers we contribute to the building and support of active and sustainable communities based on social justice and mutual respect
- The development and support of vibrant community networks and individuals within them is vital to the well being of older people
- We work more effectively with and on behalf of older people by providing opportunities for local people to use their skills, knowledge and experience through volunteering
- As volunteers who reflect the diversity of their communities, local people bring a different perspective to that of professional paid staff, which adds value to our work
- People of all ages care about and want the opportunity to contribute to making life a more fulfilling and enjoyable experience for everyone
- Older people with whom we work value the involvement of volunteers
- By involving volunteers we can offer opportunities for genuine involvement, learning and development for individuals
- Without the contribution of volunteers, we would be able to achieve only a small percentage of our work with and for older people.

In Age UK Faversham & Sittingbourne, a volunteer is any one who freely chooses to undertake work through giving of their time, skills and experience without financial remuneration other than the reimbursement of out of pocket expenses. It is work undertaken by choice and is unpaid.

In Age UK Faversham & Sittingbourne volunteers:

- Serve on our Board of Trustees
- Help with the delivery of our services
- Campaign with and on behalf of older people
- Help raise funds to support our work

We believe that our relationship with volunteers is one of mutual responsibility and commitment within which Age UK Faversham & Sittingbourne and volunteers have both rights, trust, respect and responsibilities. We aim to ensure that volunteers enjoy their involvement with us and gain from it in terms of their own personal objectives.

Purpose of this Policy

Our purpose in adopting this policy is to:

- Highlight and acknowledge the value of the contribution made by volunteers
- Reflect the purpose, value, standards and strategies of Age UK Faversham & Sittingbourne in its involvement of volunteers
- Recognise the respective roles, rights and responsibilities of volunteers in Age UK Faversham & Sittingbourne
- Confirm Age UK Faversham & Sittingbourne's commitment to involving volunteers in its work
- Establish clear principles for the involvement of volunteers, clarify their roles and the relationships between them, those who involve them and those who receive their services or work alongside them
- Help to ensure the quality of both the volunteering opportunities on offer and the work carried out by volunteers
- Acknowledge the current areas of volunteer involvement in Age UK Faversham & Sittingbourne

Recruitment and Selection

Age UK Faversham & Sittingbourne's equal opportunities statement will be adhered to when recruiting and selecting volunteers.

Volunteers will be required to complete an application form.

It is our practice to request references and to carry out DBS disclosure.

Volunteers will be placed in activities which match their skills, talents and interests and once placed they will be required to comply with Age UK Faversham & Sittingbourne's existing policies and procedures.

Support for Volunteers

- We will provide an induction programme for volunteers
- We will provide out of pocket expenses for volunteers- they will be given clear information about what expenses can be claimed and how to make a claim
- Volunteers will be given information on legislation and policies which may affect them e.g. Health & Safety and Equal Opportunities. In these respects volunteers will be treated in the same way as staff for liability purposes.
- All volunteers will be offered access to support and supervision on a regular basis, with a named person, and will be informed of who to contact in an emergency.
- Volunteers will be offered access to appropriate training to enable them to develop their capabilities and competence in relation to their volunteering role.

- Volunteers will be made aware of Age UK Faversham & Sittingbourne's complaints procedure and who they should contact if they have a grievance about any aspect of their work.

Volunteers on Age UK Faversham and Sittingbourne Board of Trustees

To support our trustee board we will provide:

- An induction on the role and responsibilities of board members and Age UK Faversham & Sittingbourne's work
- Ongoing training
- A trustee induction pack containing useful information about being a trustee, our Organisation and its service provision
- Opportunities to meet staff and key volunteers of their choice
- Written information and reports in good time on matters related to the governance of the Organisation, Age UK Faversham & Sittingbourne's constitution and other relevant legislation

Rights and Responsibilities of volunteers

In engaging volunteers, we recognise the rights of volunteers to:

- Know what is expected of them and to be given clear information
- Have clearly specified lines of support and supervision
- Be shown recognition and appreciation
- Have safe working conditions
- Be insured
- Know what their rights and responsibilities are if something goes wrong
- Be paid out of pocket expenses
- Receive opportunities for learning and development
- Be free from discrimination
- Experience personal development through their participation as volunteers
- Ask for a reference
- Be consulted on decisions which affect what they do
- Withdraw from voluntary work

We expect that volunteers will:

- Carry out their tasks in a way which corresponds to the aims and values of Age UK Faversham & Sittingbourne
- Work within agreed guidelines and remits
- Be reliable
- Respect confidentiality, follow our confidentiality policy and sign a confidentiality agreement
- Attend training and support sessions where agreed
- Not discriminate against volunteers, staff, clients and others associated with Age UK Faversham & Sittingbourne
- Maintain the good name of Age UK

Relationship with paid staff

- We will ensure that paid staff at all levels are clear about the role of volunteers and that good working relationships are fostered between them and volunteers
- Volunteers on Age UK Faversham & Sittingbourne's board of Trustees will observe fair and non-discriminatory standards and conditions of employment and health and safety in respect of paid staff

General

We will use opportunities to promote volunteering.

We will ensure the impact of volunteering and its benefits are promoted and acknowledged in our work and relationships with other groups, organisations and partners.

We will promote good practice in volunteering.

We acknowledge the value of employees' volunteering activity and encourage their participation in voluntary activities. Each request from an employee to undertake such activity will be considered on its merits.

Responsibility for the policy

Overall responsibility for the implementation, monitoring and review of policies and procedures lies with the Board of Trustees and on a day to day basis with the Chief Officer.

References: Equality Act 2010

Whistleblowing

Definition

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the Charity is responsible for or taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

Qualifying disclosures

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Charity has committed a “relevant failure” by:

- committing a criminal offence
- failing to comply with a legal obligation
- a miscarriage of justice
- endangering the health and safety of an individual
- environmental damage or
- concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Charity will take any concerns that you may raise relating to the above matters very seriously.

Employees must reasonably believe that the disclosure is “in the public interest”. We encourage you to use the procedure to raise any such concerns.

Should the concern not meet the requirement to be a qualifying disclosure, you should raise this under the Charity’s grievance policy. Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, i.e. it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the grievance policy.

The procedure

In the first instance the employee should report any concerns they may have to their line manager or the Chief Executive Officer where the concern relates to their line manager or it is not appropriate to make the report to their line manager. All concerns reported will be treated in the utmost confidence.

If the employee does not report their concerns to the Chief Executive Officer they should take them direct to the appropriate organisation or regulatory body with authority for that area.

Following receipt of a disclosure made under this policy, an investigation meeting will be held with the employee. The purpose of this meeting is to gather as much information as possible from the employee regarding their concerns, including whether they have any supporting evidence or can identify any witnesses.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements.

Once the investigation is complete, the investigation manager will write to the employee confirming the outcome.

If the employee is not satisfied with the explanation or outcome, they may raise the matter with the appropriate official organisation or regulatory body. Alternatively, employees may raise a formal complaint under the Charity's grievance policy.

Formal action

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

Protection against detrimental treatment

All employees who raise matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

Recording and Monitoring

The Charity will:

- Record the number of whistleblowing disclosures we receive and their nature
- Maintain records of the date and content of feedback provided to whistleblowers

Complaints by non-employees

Third parties outside the organisation may also raise concerns, and these may be reported to the Charity in the same way as the above procedure for employees, or they may be made direct to another organisation such as one of our governing bodies, e.g. the Charity Commission. Where they are raised within the Charity they will be recorded and dealt with in exactly the same way as detailed in these procedures. Where they are made externally and we are only made aware of them when the organisation to whom the concern was made makes contact with us, we will co-operate fully and record both the concern and the outcome in the same way as above. As before, the Chief Executive Officer will keep a record of such concerns, and circulate them to the Board.