

Caution Alert Policy

Responsible Officer	Executive Director Customer Services
This policy is applicable to	All companies
Approved by	KMT
Date approved	25/3/21
Frequency of review	Every 3 years or significant change in guidance or legislation
Date of next review	March 2024
Implementation date	April 2021
Key related documents (policy, procedure, customer literature)	<p>Legislation:</p> <ul style="list-style-type: none"> • Health and Safety at Work Act (1974) • The Human Rights Act (1998) • Equality Act (2010) • Data Protection Act <p>Guidance:</p> <ul style="list-style-type: none"> • Data Protection Good Practice Note – The use of violent warning markers. <p>Policies:</p> <ul style="list-style-type: none"> • Lone Working Policy • Data Protection Policy • Unacceptable Customer Behaviour Policy • Anti-Social Behaviour Policy
Sources of best practice or guidance used in developing this policy	Discussions with other RPs and data protection specialists.

Version control

Version number (see note 1)	1	Author of Policy	Kelly Taylor
Equality Impact Analysis (see note 2)	Initial/Full	Equality Analysis Date	09.03.21
Privacy Impact Analysis (see note 2)	Initial/Full	Privacy Analysis Date	

Document change history

Version	Date	
1	09/03/21	

Consultation

Consultation Group (if applicable)	Date of Consultation (if applicable)
Staff	March 2021
Union(s)	NA
Customers	NA

Human Resources / Organisation Development	NA
Health and Safety Working Group	NA
Other stakeholder (please state)	NA

Policy statement
<p>Karbon Homes is committed to delivering excellent customer service that meets the needs of all its customers.</p> <p>On occasions employees of Karbon Homes will come into contact with tenants, residents and applicants who may express types of unacceptable behaviour. We need to ensure that our employees deal with such tenants, residents and applicants appropriately and fairly. Karbon Homes also needs to ensure the health and safety of its employees.</p> <p>When customers express unacceptable behaviour which could be detrimental to the welfare and safety of staff, Karbon Homes has a duty to investigate any such incident and consider the need for the customer's details to be included on the Caution Alert Register.</p> <p>This policy sets out the instances when a customer will be added to the caution alert register and the steps that we will take to ensure that when an individual's details are added to the caution alert register the entry complies with the Data Protection principles listed in the Data Protection Act.</p> <p>This policy applies to all employees and covers incidents of difficult or violent behaviour perpetrated by a service user, tenant or leaseholder, their friends or family members or members of the public.</p>

Risk policy is designed to control
10 Regulatory and Legislative Environment.

Definitions
NA

Key performance measures
Entries are reviewed in line with published timescales.

Abbreviations
NA

1.0 Purpose of policy

- 1.1 We are committed to protecting our employees from difficult and dangerous situations whilst they are at work and we are mindful about the impact of these situations on the individual and on the organisation.
- 1.2 Violence and other unacceptable behaviour or environments encountered by staff in the course of their work can be detrimental to an individual's physical and emotional wellbeing, both in the short and long term.

- 1.3 This policy has been developed as part of our approach to guide, protect and support staff whilst they carry out their work. In conjunction with other policies it aims to ensure that violence at work is avoided and if it does occur, that it is dealt with in the most effective and sensitive way possible.
- 1.4 **This policy sets out the instances when a customer will be added to the caution alert register** and the also sets out the steps, which we will take to ensure that when an individual's details are added to the caution alert register the entry complies with the Data Protection principles listed in the Data Protection Act.
- 1.5 Warning indicators will be used to inform staff about any known issues which may affect their visits and require us to tailor our services to specific needs and situations.

2.0 Objectives

- To protect our staff, sub-contractors, partners and communities.
- To support staff.
- To investigate incidents in an appropriate and proportionate manner.
- To manage, monitor and review customers listed on the caution alert register.
- To share information with external agencies where appropriate.

3.0 Policy detail

- 3.1 We recognise that the nature of our work may sometimes put employees into potentially difficult situations and we will ensure that effective policies and procedures are in place to reduce risk as far as reasonably possible. Our responsibility is not only driven by a moral obligation but also a legal one, outlined in the Health and Safety at Work Act 1974:

'It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees'.

- 3.2 Violence at work should not be accepted as 'just part of the job' and will not be tolerated by us in any circumstances or to any degree.
- 3.3 There will be occasions when some customers, members of their household or their visitors exhibit unacceptable behaviour which could be detrimental to the welfare and safety of staff. On these occasions consideration will be given to add them to the caution alert register.
- 3.4 Unacceptable behaviour includes, but is not limited to:
- Threats against staff.
 - Violence against staff.
 - Sexually intimidating behaviour.
 - Danger of sharps.
 - Abusive behaviour/inappropriate language.

- Any other inappropriate behaviour deemed to create a perceived risk.
- Keeping of dangerous animals

3.5 Managers will investigate any incident reported and consider the need for the individual's details to be included on the caution alert register.

4.0 Data Quality

4.1 When making a decision to include a person on the register, the manager will take into account the nature of the incident and the degree of risk to the welfare/safety of staff in the future. They will also consider whether the individual should be informed that they are placed on the register.

4.2 In line with best practice there are circumstances where it will be appropriate to not advise an individual that they have been placed on the Caution Alert register.

5.0 Fair Collection of Information

5.1 We will consider incidents and information reported to us by our staff, customers, contractors and agencies such as the police, local authorities, support providers and other partners.

5.2 After investigation and where appropriate the customer will be added to the caution alert register and the relevant manager will inform the customer, if so decided, of the incident(s) which led to their inclusion on the caution alert register, and when the information will be reviewed.

6.0 Recording

6.1 A caution alert warning (red flag) will appear against the lead tenant on the relevant tenancy added to the caution alert register.

6.2 This will be supported by an appropriate code that highlights what staff need to be aware of and action needed prior to visiting the customer or property.

6.3 All members of staff visiting a customer must check if there is a caution alert warning and associated message before visiting.

7.0 Passing Information to other Agencies and Companies

7.1 The manager will consider whether other agencies and companies (e.g. social services or contractors) should be made aware that a caution alert has been added to a customer's record and be provided with information of the action required.

7.2 Disclosures to other agencies and companies will be made strictly on a case by case basis where failure by us to make the disclosure would be likely to prejudice the prevention or detection of crime or could put another individual in a dangerous situation.

7.3 Our out of hours call handing agencies will, as a matter of course, be informed of all flagged individuals and the required actions.

8.0 Review Periods

8.1 A review of each entry will take place every 6 months and a decision will be made to leave or remove the caution alert. In the case of 'do not visit', reviews will be undertaken monthly.

9.0 Access to Information

9.1 Individuals have the right of access to any information we hold about them. Please refer to the Subject Access Request Procedure.

10.0 Customer Vulnerabilities

10.1 This policy is applied in line with Our Approach To Vulnerability Policy. Everyone matters. We want people to be treated fairly, have equality of opportunities, freedom, respect, and access to our services. We will offer support, reasonable adjustments, and adaptations to remove barriers. We will discuss with our customers what is reasonable and appropriate. In delivering this service we may need to escalate a particular case – if we do then customer vulnerabilities will be considered as part of the decision-making process.

10.2 We will support people with vulnerabilities to deliver this service. We will work alongside external agencies such as social services, the police and fire services and other appropriate agencies to help and support people with vulnerabilities in the delivery of our services but also to ensure we meet our statutory and regulatory requirements as a social landlord. Details are provided in the appropriate areas in this policy. All our customer policies are available on the website.

11.0 Monitoring and Review

11.1 This policy will be reviewed at least every 3 years. The review will be brought forward if there are significant changes to good practice, regulatory or legislative requirements.

11.2 The Executive Director of Customer Services is responsible for delegating the implementation, monitoring and review of this policy.

12.0 Equality and Diversity

12.1 This policy is implemented in line with the Karbon Homes Equality and Diversity Policy and associated legislation including the Public Sector Equality Duty and Equality Act 2010 where we aim to eliminate discrimination, advance equality of opportunity and foster good relations and define the nine protected characteristics as their age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

12.2 However, our approach to equality and diversity goes beyond these protected characteristics and we take into consideration additional factors such as socio-economic status and language barriers which may also impact individuals. Our vision is one where everyone within Karbon Homes is treated fairly, have equality of opportunities, freedom, respect and access to our services.

12.3 All of our customer policies and key information are made available on the Karbon Homes website and MyKarbon portal which have an easy-to-use assistive tool that

supports accessibility to our information. This includes translation, audio, changes to the size of text, ruler and screen mask. Other reasonable adjustments that can help to make our information and services more accessible are sign language and language interpreters.

12.4 We will work to improve accessibility for everybody that we deal with offering reasonable adjustments, adaptations and discussing ways that we can work to remove barriers that you may experience. A reasonable adjustment involves making a change to the way that we usually do things. We work together to look at options and agree what would be reasonable in your circumstances an example of this may be:

- Allowing more time at each stage of the complaints process for you to respond
- Providing our replies in a different format such as audio.

If you would like to find out more please contact us.

13.0 Data Protection and Privacy

13.1 We have a clear policy on data protection and sharing data with other partners/third parties under the requirements of the UK General Data Protection Regulation, the Data Protection Act 2018 and other associated legislation. This is clearly set out in the Data Protection Policy for the Karbon Homes Group which, along with its associated procedures, must be followed throughout the operation of this policy.

14.0 References

Legislation:

- Health and Safety at Work Act (1974)
- The Human Rights Act (1998)
- Equality Act (2010)
- Data Protection Act

Guidance:

- Data Protection Good Practice

Policies:

- Lone Working Policy
- Data Protection Policy
- Anti-Social Behaviour Policy
- Equality and Diversity Policy
- Unacceptable Customer Behaviour Policy