

## Caution Alert Policy

### 1.0 Purpose of policy

- 1.1 Staff are our most valuable resource and we are therefore concerned about the impact of difficult situations on both the individual and on the organisation.
- 1.2 Violence and other unacceptable behaviour 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 On an organisational level, difficult situations can lead to a decrease in staff morale, performance and productivity, and an increase in staff absence and turnover.
- 1.4 A large number of our employees work within environments that may potentially place them at risk from violence and other unacceptable behaviour.
- 1.5 Although unacceptable incidents are rarely experienced, we recognise the need for a policy and procedure to reduce and manage risk and to deal effectively with difficult situations should they arise.
- 1.6 Violence in the workplace can involve a variety of behaviours, many of which are less visible than physical assault, such as verbal abuse or intimidation. We consider violence at work to encompass any form of behaviour which may adversely affect an individual physically or emotionally.
- 1.7 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.
- 1.8 This policy 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.

### 2.0 Objectives

- To protect our staff, sub-contractors 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 put employees into potentially difficult situations and we accept our responsibility for ensuring 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 We are committed to ensuring that all staff are equipped and trained to deal with difficult situations, and that a relevant policy and procedure is consistently adhered to and continuously reviewed. In the event that violence does occur, we will ensure that any members of staff involved receive support they require. Additionally, we will take appropriate action against perpetrators who disrespect our staff.

3.4 There will be occasions when some individuals exhibit unacceptable behaviour, which could be detrimental to the welfare and safety of staff.

3.5 Unacceptable behaviour includes, but is not limited to:

- Threat against staff.
- Violence against staff.
- Sexually intimidating behaviour.
- Danger of sharps.
- Abusive behaviour/inappropriate language.
- Any other inappropriate behaviour creating a risk.

3.6 We will investigate any such incident and consider the need for the individual's details to be included on the Caution Alert Register.

**THE CAUTION ALERT REGISTER IS A LIST GENERATED FROM OT1S LISTING ALL TENANCIES MARKED WITH A SEVERE DIARY ENTRY.**

### 3.7 Data Quality

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

3.7.2 In certain circumstances, individuals may not be informed, in accordance with the exemptions provided in the Data Protection Act. Staff will be trained in the use of

this policy and made aware of the associated procedures, which must be followed in respect of incidents. Staff will also be made aware that they have a duty to report such incidents, the type of incidents that are reportable and the Manager to whom they should pass the information.

### **3.8 Fair Collection of Information**

3.8.1 After investigation the appropriate 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 removed or examined with a view to removal.

3.8.2 WE WILL ALSO CONSIDER INCIDENTS/INFORMATION REPORTED BY OTHER AGENCIES SUCH AS THE POLICE, LOCAL AUTHORITIES, SUPPORT PROVIDERS AND CONTRACTORS.

### **3.9 Recording**

3.9.1 A caution alert warning notice will appear on each OT1S Tenancy record for persons on the register.

9.9.2 This will be indicated by:

NON VIOLENT = **A red flag created by a severe diary entry.**

POTENTIALLY VIOLENT = **PV (Potentially Violent) notice against the person and a red flag created by a severe diary entry.**

THE SEVERE DIARY ENTRY WILL CONTAIN THE CODE ADVISING WHAT STAFF SHOULD DO IF THEY NEED TO MEET WITH THE CUSTOMER OR ACCESS THEIR HOME.

3.9.3 All members of staff visiting a customer must check if there is a Caution Alert warning and associated message before visiting.

3.9.4 If staff do not have immediate access to OT1S or the Customer Information Portal (CIP), or are unsure of the content of a severe diary entry e.g. they can't understand a code, they should contact Customer Services before making a visit and ask for clarification.

### **3.10 Passing Information to other Agencies and Companies**

3.10.1 We may consider that other agencies and companies (e.g. Social Services and contractors), which may have contact with a potentially violent individual, 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.

3.10.2 If this course of action is taken and notification is thought appropriate, the customer is to be informed that the information in the Caution Alert Register has been shared with others.

3.10.3 In other instances, disclosures to other agencies will be made strictly on a case-to-case basis where failure by us to make the disclosure would be likely to prejudice the prevention or detection of crime.

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

### **3.11 Review Periods**

3.11.1 Review of incidents will take place after 12 months.

3.11.2 After investigation, the entry will either be deleted, or if applicable, the individual concerned will be advised that the entry will remain on the Caution Alert Register for a further period.

3.11.3 Managers will quality check all PV/red flags every quarter to ensure data is displayed/entered correctly.

### **3.12 Access to Information**

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

## **4.0 Monitoring and Review**

4.1 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.

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

4.3 We will consult with tenants/staff regarding this policy wherever this is appropriate.

## **5.0 Equality and Diversity**

5.1 This policy is implemented in line with the Group's Equality and Diversity Policy and associated legislation. Consideration will be given to all protected characteristics under the Equality Act 2010 to eliminate discrimination, advance equality of opportunity and foster good relations.

5.2 This policy and associated documents are available in different languages and alternative formats where necessary.

## **6.0 Data Protection and Privacy**

6.1 We have a clear policy on data protection and sharing data with other partners/outside agencies under the requirements of the Data Protection Act 1998. This is clearly set out in our Data Management Policy which, along with the supporting Data Management Guidelines, must be followed throughout the operation of this policy.

## **7.0 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 Note – The use of violent warning markers.

### **Policies:**

- Lone Working Policy
- Data Protection Policy
- Anti-Social Behaviour Policy