



## Safeguarding Policy & Procedures

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**Approved by** Malcolm Yates  
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**Date of next review** June 2020.

### 1. Definitions

'Focus Management' shall mean Focus Management for Business Ltd based at Ransom Wood Business Park, Southwell Road West, Mansfield, Nottingham NG21 0HJ.

'Vulnerable Group' or 'Vulnerable Groups' shall mean all persons under 18 years of age and vulnerable adults who are enrolled to Focus Management courses and to whom this Policy is specifically directed.

'Safeguarding Issues Manager' shall mean the designated person responsible for safeguarding issues who is Malcolm Yates, Managing Director.

'LADO' shall mean the relevant local authority designated officer.

'Focus Management Site/s' shall mean any location used, rented by or owned by Focus Management for the purpose of conducting training activities.

'Employer' shall mean the business enterprise or organisation that employs or is responsible for persons in Vulnerable Groups that they have nominated to attend the Provision

'Contractor' shall mean the college, business enterprise or organisation that is nominated as a lead contractor by the funding body, and who working in partnership with Focus Management ensures that the programme is delivered to the required quality and in accordance with the appropriate procedures. The Contractor is the source of funding for Provisions supplied by Focus Management.

'Provision' shall mean the agreed training programme to be delivered at any Focus Management site or at an Employer's premises.

## 2. Principles

Focus Management is committed to building a 'culture of safety' in which persons in Vulnerable Groups are protected from abuse and harm in all areas of its service delivery.

The Children Act 1989 and Joint Chief Inspectors Report on Arrangements to Safeguard Children (2002) describe safeguarding as meaning that:

“Agencies (and organisations) working with children and young people take all reasonable measures to ensure that the risks of harm to the individual's welfare are minimised; and where there are concerns about children and young people's welfare, all agencies (and organisations) take all appropriate actions to address those concerns, working to agreed local policies and procedures, working in partnership with other local agencies.”

The Safeguarding Vulnerable Groups Act 2006 extends this legal duty to vulnerable adults. The Act sets out the type of activity in relation to children and vulnerable adults which is regulated.

It is therefore vital that all staff understand and comply with Focus Management's Persons in Vulnerable Groups Safeguarding Policy.

The basic principles on which it stands include:

1. The welfare of all persons in Vulnerable Groups is paramount
2. We will work together with other relevant agencies
3. We will be open with parents as long as this does not put persons in Vulnerable Group at risk
4. Confidentiality is important in all cases, but not at the expense of the welfare of the person in a Vulnerable Group
5. We accept the duty of care to all persons in Vulnerable Groups with which we work. Focus Management will ensure that the activities it runs and the environment it works in are safe
6. It is the responsibility of all paid and voluntary staff working with Focus Management to prevent all forms of abuse of all persons in Vulnerable Groups with whom they come into contact
7. Every individual within Focus Management has a responsibility to inform the Safeguarding Issues Manager in respect of concerns relating to the safeguarding of persons in Vulnerable Groups; the Safeguarding Issues Manager must decide if the concerns should be communicated to the relevant social services department, appropriate local authority representative or the police.
8. Staff who have reason to believe that a student may be at risk of bringing harm to themselves, either through self harm or potential suicide, should contact the Safeguarding Issues Manager
9. We recognise the existence of unidentified abused persons in Vulnerable Groups, and that some of these may be associated with Focus Management.
10. Each staff member is responsible for ensuring that the policy is translated into action through his or her daily behaviours.

Focus Management will ensure that staff and volunteers interacting with persons in Vulnerable Groups are aware of their responsibilities for safeguarding the welfare of persons in Vulnerable Groups. This will be done through providing training and support in helping them understand

the needs of our client group, as well as ensuring they understand their individual and organisational responsibilities when working with Vulnerable Groups.

Working with the appropriate bodies Focus Management will ensure equality across all strands (Race, Disability, Religion/Belief, Age, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Sex (male or female), Sexual orientation). Focus Management aim to improve outcomes for all students especially Vulnerable Groups.

### **3. Learners with Learning Difficulties, and/or Disabilities**

Some learners with learning difficulties and/or disabilities may be especially vulnerable to abuse. Extra care should be taken to interpret correctly apparent signs of abuse and neglect. Any indication of abuse of these students should be reported in the same way as for other students, according to local established procedures.

Where abuse is suspected, students/adults who have difficulties in communicating should be given the chance to express themselves to a member of staff with appropriate communication skills and/or be provided with an advocate. Focus Management should create an atmosphere in which students with learning difficulties and/or disabilities feel confident and able to discuss these matters.

### **4. Commitment to Procedures**

Focus Management is committed to these principles and intends to implement them through this policy and these procedures. Each staff member is responsible for ensuring that the policy is translated into action through his or her daily behaviours.

### **5. Legal Basis of Focus Management's Role**

Focus Management is not an investigating organisation. As issues arise, Focus Management's role will be to record events, decide whether to refer the issue on and then make that referral in line with the Contractor's procedures.

### **6. The Role of the Safeguarding Issues Manager within Focus Management**

It is the role of the Safeguarding Issues Manager to lead Focus Management's response to any person in a Vulnerable Groups Safeguarding issue being raised, to liaise with outside organisations, to refer the issue in accordance with the Contractor's procedures, where appropriate and to make and keep detailed records of the issue/incident.

### **7. Records of Issues and Incidents**

Persons in Vulnerable Groups at the centre of the issue have a need for confidentiality. Therefore, Focus Management has a need for security to ensure this confidentiality. However, this is not absolute confidentiality, and all records should be available for inspection by the investigating body (Police or Social Care).

### **8. Sharing of Information with Focus Management**

No one will make decisions within Focus Management about Safeguarding issues on their own. The only decision to make is whether to refer the matter on to an investigating body and if so, which one. This decision will normally be made through discussion between the staff member with concerns and the Safeguarding Issues Manager. There may be occasions where the Safeguarding Issues Manager seeks advice from **the Contractor**.

## **9. Relationships with Parents**

Focus Management wishes to preserve its good relationships with the parents of any person in a Vulnerable Group associated with it, both as service users and volunteers. However, the first principle on which Focus Management's work is based is that the welfare of persons in a Vulnerable Group is paramount. Consequently, Focus Management will consult and confer with parents of Vulnerable Persons involved in Safeguarding issues openly and honestly except in those rare circumstances where person's in Vulnerable Groups welfare may be harmed by doing so.

## **10. Maintaining High Standards**

Focus Management places people in positions of responsibility for persons in Vulnerable Groups; consequently, Focus Management seeks to do all that is reasonable to ensure the good character of its employees and volunteers and the safety of persons in Vulnerable Groups. Therefore the recruitment and induction procedures are necessarily robust and all staff and key volunteers undertake an enhanced Disclosure and Barring Service check – see our separate Recruitment Procedures.

Focus Management recognises however that these checks are not a guarantee that the checked person's behaviour will always continue to be appropriate. All staff are responsible for maintaining high standards of behaviour across Focus Management programmes and are encouraged to raise their own concerns of other's inappropriate behaviour through the "whistle-blowing" policy highlighted below.

## **11. Allegations against Focus Management Staff**

Where an allegation is made against a member of staff, the matter is immediately referred to the Safeguarding Issues Manager who will advise a Director of the company immediately. In all cases the member of staff will be suspended while the allegation is investigated. This is for the benefit of the member of staff and Vulnerable Groups and does not in any way pre-judge the outcome of the investigation. If the allegation is about the Safeguarding Issues Manager, then it will be dealt with by a Director of the company.

In all cases the issue will be referred to the Local Authority Designated Officer and dealt with in accordance with the Contractor's procedures.

## **12. Whistleblowing Policy**

Where any member of staff is concerned about the inappropriate behaviour of any other member of staff, or suspects them of abuse, the matter should be confidentially reported to the Safeguarding Issues Manager who will investigate in accordance with the Contractor's procedures.

Focus Management is committed to acting in accordance with the Public Interest Disclosure Act 1998. We will not discriminate against anyone making an allegation against another member of staff and will respect their confidentiality where possible. Confidentiality may not be able to be maintained in the event of an official investigation.

## **13. Support for Staff and Volunteers Involved in Safeguarding Issues**

Focus Management recognises that Safeguarding issues are likely to be stressful for staff involved in them. Focus Management will seek to provide a reasonable and appropriate level of support for staff involved in Vulnerable Groups Safeguarding issues.

If any members of staff are cited in any way as part of an incident they will be removed from the situation immediately. This removal may be redeployment or suspension for a period as appropriate. Suspension should in no way be interpreted as any admission or accusation of fault.

#### **14. Training for Staff and Volunteers**

All staff and volunteers have an induction period during which they will receive safeguarding training and guidance. It is the responsibility of the Finance Director to ensure that all staff (and volunteers if appropriate) have successfully completed their induction training. Following this, all staff will receive regular Safeguarding training either via an on-line module or workshop event.

Training is given on:

- The duty of care to prevent abuse including the duty to report any abuse discovered or suspected.
- Training on what constitutes abuse and how to recognise it.
- The procedural approach of how and whom to report abuse if discovered or suspected.
- Contact information for independent persons, whom staff and volunteers can approach if they know or suspect that an abuser may be a member of Focus Management staff.
- Knowledge and understanding of what happens if abuse is reported.
- Guidance on supporting distressed Vulnerable Persons.

#### **15. Supervision of Vulnerable Persons**

Persons in Vulnerable Groups within Focus Management's care will be properly supervised at all times. Focus Management will where possible ensure that there is an appropriate level of male and female staff cover if working with a mixed gender group.

#### **16. Safeguarding Procedures**

##### **16.1 Quick Reference Guide to Working under the Safeguarding Principles**

At no time should staff put themselves in a position of being alone with those in their charge. This enhances the protection of both the Vulnerable Groups and the staff.

##### **As soon as you have a Safeguarding concern:**

- Keep control; the persons in Vulnerable Groups will be depending on you.
- Remember your duty of care to the whole group of persons in Vulnerable Groups – **do not** place others at any risk.
- Keep an open mind.
- Respond to the person's in a Vulnerable Groups emotional state appropriately.
- Beware of your own interpretation of what you hear.

- Start recording information including times and those in attendance as well as what was said.
  - Record all subsequent events up to the time of Police or Social Care intervention.
  - Support the person in a Vulnerable Group's feelings and manage your own.
  - All external enquiries (from media or public) must be directed towards the Focus Management Safeguarding Issues Manager.
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- **Do not** question the Person in a Vulnerable Group – just listen.
  - **Do not** promise confidentiality.
  - **Do not** use leading questions.
  - **Do not** stop a person in a Vulnerable Group who is freely recalling significant events.
  - **Do not** ask the person in a Vulnerable Group to repeat their story to a colleague.
  - **Do not** ask the person in a Vulnerable Group to write their story down.
  - **Do not** conduct your own investigation into any incident.
  - **Do not** allow anyone else to interview a person in a Vulnerable Group.
  - **Do not** make statements to any media or any member of the public.

Follow this Simple checklist for Vulnerable Groups Safeguarding; contact the Safeguarding Issues Manager who will get help from the professional services where necessary; make sure a detailed log of events of kept.

**DO NOT** contact the Police or Social Care without seeking advice from the Safeguarding Issues Manager.

By following these guidelines, be assured that what you are doing is right and you are following the best procedure for supporting the person in a Vulnerable Group

## **16.2 Guidance Information for Staff and Volunteers**

Equality Act – Definitions of types of discrimination

### ***Direct discrimination***

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (see perceptive discrimination below), or because they associate with someone who has a protected characteristic (see associative discrimination below).

### ***Associative discrimination***

Already applies to race, religion or belief and sexual orientation. Now extended to cover age, disability, gender reassignment and sex. This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.

### ***Perceptive discrimination***

Already applies to age, race, religion or belief and sexual orientation. Now extended to cover disability, gender reassignment and sex. This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

### ***Indirect discrimination***

Already applies to age, race, religion or belief, sex, sexual orientation and marriage and civil partnership. Now extended to cover disability and gender reassignment. Indirect discrimination can occur when you have a condition, rule, policy or even a practice in your company that applies to everyone but particularly disadvantages people who share a protected characteristic. Indirect discrimination can be justified if you can show that you acted reasonably in managing your business, ie that it is 'a proportionate means of achieving a legitimate aim'. A legitimate aim might be any lawful decision you make in running your business or organisation, but if there is a discriminatory effect, the sole aim of reducing costs is likely to be unlawful. Being proportionate really means being fair and reasonable, including showing that you've looked at 'less discriminatory' alternatives to any decision you make.

### ***Harassment***

Harassment is "unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual". Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Employees will now be able to complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves. Employees are also protected from harassment because of perception and association.

### ***Third party harassment***

Already applies to sex. Now extended to cover age, disability, gender reassignment, race, religion or belief and sexual orientation. The Equality Act makes you potentially liable for harassment of your employees by people (third parties) who are not employees of your company, such as customers or clients. You will only be liable when harassment has occurred on at least two previous occasions, you are aware that it has taken place, and have not taken reasonable steps to prevent it from happening again.

### ***Victimisation***

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint. There is no longer a need to compare treatment of a complainant with that of a person who has not made or supported a complaint under the Act.

## **16.3 Categories of Abuse**

It is accepted that any definition has its limitations in terms of accuracy and relevance. Bearing this in mind, the following definitions are offered to help our understanding:

### ***Neglect***

Neglect is the persistent failure to meet a person in Vulnerable Group's basic physical and/or psychological needs, likely to result in the serious impairment of the person in a Vulnerable Group's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect the person in a Vulnerable Group from physical harm or danger, or the failure to ensure access to appropriate medical aid or treatment. It may also include neglect of, or unresponsiveness to a person in a Vulnerable Group's basic emotional needs.

### ***Physical Abuse***

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a person in a Vulnerable Group, or any student. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a person in a Vulnerable Group whom they are looking after. This is commonly described using terms such as Induced/Fabricated Illness by Carer or Munchausen's Syndrome by proxy.

### ***Sexual Abuse***

Sexual abuse involves forcing or enticing a person in a Vulnerable Group to take part in sexual activities, whether or not the person in a Vulnerable Group is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities such as involving person in a Vulnerable Group looking at, or in the production of pornographic material, or watching sexual activities, or encouraging persons in Vulnerable Groups to behave in sexually inappropriate ways.

### ***Emotional Abuse***

Emotional abuse is the persistent emotional ill treatment of a person in a Vulnerable Group such as to cause severe and persistent adverse effects on the person in a Vulnerable Groups emotional development. It may involve conveying to persons in Vulnerable Groups that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person.

It may feature age or developmentally inappropriate expectations being imposed on persons in a Vulnerable Groups. It may involve causing persons in a Vulnerable Groups frequently to feel frightened or in danger, of the exploitation or corruption of a person in a Vulnerable Group. Some level of emotional abuse is involved in all types of ill treatment of persons in a Vulnerable Groups, though it may occur alone.

## **16.4 Causes for Concern:**

### ***Actual Physical Injury***

Most Vulnerable Persons will pick up a good number of injuries in the normal course of being active and growing up.

What may raise concerns about some injuries to person in a Vulnerable Groups is not only the nature of the injuries themselves, but how they may be displayed or hidden. Things that may raise concern include:

- Injuries to soft fleshy areas of the body that are not normally exposed to knocks and bangs



- Clusters of injuries indicating repetitive harm over a prolonged period of time
- Injuries for which the person in a Vulnerable Group has no immediate or obviously genuine explanation for
- Injuries that the person in a Vulnerable Group actively seeks to hide from discovery

### ***Physical Presentation***

How the person in a Vulnerable Group presents itself may give observers cause for concern. This may be in the form of:

- What they are wearing
- Their demeanour
- Their state of health
- Their cleanliness

While there may be perfectly innocent explanation for any of these at any particular time, when taken together as part of a broader picture over a period of time, these factors can inform a careful observer.

### ***Allegation***

An open and honest disclosure of abuse by a person in a Vulnerable Group to a member of staff is an indication of the high level of esteem and trust that the person in a Vulnerable Group has for the member of staff. Staff should reciprocate that respect by supporting that person.

Any allegation of any form of abuse by a person in a Vulnerable Group must be taken seriously. Staff should be aware however, that the very nature of persons in a Vulnerable Group means that they will not necessarily yet have the access to the full range of communication methods, impacting on their ability to express themselves.

An allegation of abuse may be made through an unexpected form of communication and may be made very subtly or even subconsciously. Consequently, it can be difficult to understand what is really going on for the person in a Vulnerable Group at any particular moment and staff are required to pay attention to and interpret subtle signals from the person in a Vulnerable Group

### ***Behaviour***

A person in a Vulnerable Groups behaviour is the result of a vast number of factors. Consequently it can be difficult to sort what is relevant from what is not relevant. A person in a Vulnerable Group's behaviour can merely tell an observer that *their perception of their experience* is bad in some way.

In addition to this, staff need to recognise that some behaviours arising from abuse can be quite unexpected or "odd". Statistically however, the only strong behaviour indicator of any form of abuse is inappropriately sexual behaviour in the very young.

Once again, while there may be perfectly innocent explanations for any behaviour at any particular time. When taken together as part of a broader picture over a period of time, these factors can inform a careful observer.

### **16.5 Listening to Vulnerable Persons**

If a person in a Vulnerable Group discloses abuse, remember that this may be the beginning of a legal process, as well as a process of recovery for the person in a Vulnerable Group. Legal action against the perpetrator can be seriously damaged by any suggestion that the person in a Vulnerable Group has been led in any way.

- Rather than directly questioning the person in a Vulnerable Group, just listen and be supportive
- Never stop a person in a Vulnerable Group who is freely recalling significant events, but don't push them to tell you more than they freely wish
- Write an account of the conversation immediately. Put the date and timings on it and mention who else was present. Then sign it and hand it either to your line manager or directly to the Focus Management Vulnerable Persons Safeguarding Issues Manager who will refer the matter onward if appropriate
- All subsequent events affecting the person in a Vulnerable Group need to be recorded, up to the time that the formal video interview takes place

### **17. Safeguarding Statement to Service Users**

The care of Vulnerable Groups is Focus Management's top priority. Focus Management staff will listen to your worries with respect and will take what you say seriously.

What you say to Focus Management staff will be kept secret from the general public. Focus Management needs to make sure that it does the right thing for Vulnerable Groups so if what you say to any Focus Management staff makes them concerned then they will write it down and take it further.

They will talk to a member of the senior management team at Focus Management who will decide whether the Police or Social Care should know about what you have said. We may want to speak with your parents to ask them questions or to tell them what is going on.

The Police or Social Care might then start their own investigation and they may want to talk to you or other people involved. Their top priority is the care of people in a Vulnerable Groups too, so you can be sure that they will only do what is right and proper.

### **18. Safeguarding Statement to Parents of Service Users**

The care of person in a Vulnerable Groups is Focus Management's top priority. Our staff will listen to any worries your person in a Vulnerable Group may have with respect and will take what they say seriously. Anything they say to Focus Management staff will be kept secret from the general public.

We have a duty to ensure that we do the right thing for Vulnerable Groups at all times, so if things that they say to Focus Management staff make the staff concerned about their welfare then they will write it down and it may be taken further.

The member of staff will talk to a member of our senior management team who will follow Vulnerable Group protection procedures agreed by the Contractor. This may involve Social Care or the Police being contacted.

Social Care or the Police might then start their own investigation and they may want to talk to you or other people involved. Their top priority is the care of Vulnerable Groups too, so you can be sure that they will only do what is right and proper.

If you would like to know more about Vulnerable Groups protection procedures, you can find this on the internet. The website addresses for Nottingham City and Nottinghamshire County are:

<http://www.nottinghamcity.gov.uk/index.aspx?articleid=843>  
<http://www.nottinghamshire.gov.uk/safeguardingchildrenprocedures>

## **19. Legislation**

Legislation that has guided us previously includes:

- Equal Pay Act, 1970 (enacted 1975)
- Rehabilitation of Offenders Act, 1974
- Sex Discrimination Act, 1975 (and all subsequent amendments)
- The Gender Reassignment Regulations, 1999
- Race Relations Act, 1976 (and all subsequent amendments)
- Race Relations Amendment Act, 2000
- Disability Discrimination Acts, 1995 and 2005
- Special Education Needs and Disability Act, 2001
- The Equality Act 2006
- Health and Safety at Work Act, 1974
- Protection from Harassment Act, 1997
- Employment Rights Act, 1998
- Human Rights Act, 1998
- Freedom of Information Act, 2000
- Employment Relations Act, 1999
- Employment Equality (Sexual Orientation) Regulations, 2003
- Employment Equality (Religion and Belief) Regulations, 2003
- Employment Equality (Age) Regulations 2006

Since 2005, the UK Government has been discussing and consulting on new equality legislation. Existing current legislation is piecemeal and there are gaps and anomalies within it. For example, public bodies have a legal duty to produce Race, Disability and Gender Equality Schemes, but no similar duty exists with regard to the other current three strands of equality, namely Religion/Belief, Sexual Orientation and Age.

The new Equality Act 2010 is designed to bring together all existing Equality legislation and add new 'strands' to pick up areas not previously addressed. It will simplify the legal framework and make it more comprehensive. The Equality Act 2010 received Royal Assent on the 8th April 2010. Most of its requirements will become law in October 2010.

## **20. Supervision Policy on Focus Management Sites**

Focus Management is committed to ensuring that persons in Vulnerable Groups attending programmes on Focus management Sites are properly supervised throughout the day for their

safety, general wellbeing and to enable them to gain the maximum benefit from their participation. We aim to provide a duty of care to all persons in Vulnerable Groups centred on clear communication and application of rules and boundaries, staff vigilance and management monitoring.

### ***Level of Supervision***

We operate with one tutor for each group; there is in addition access to a senior manager plus administrative support at all times. We operate with a maximum group size of 10. The tutor responsible for the group will be present at all times to allow for group control during sessions and to witness of any incidents that may occur.

Should staff on any Provision not be available due to sickness etc available staff from other Provisions will be deployed or appropriate sessional staff employed. (All Focus Management staff have been Disclosure and Barring Service checked – however, if a new member of staff or sessional staff do not have Disclosure and Barring Service clearance they will not be left alone with persons in Vulnerable Groups at any time)

### ***Working Day***

Persons in Vulnerable Groups are permitted entry to all Focus Management Provisions from 9.00am until 5.00pm or as otherwise advised to the Employer. Person in Vulnerable Groups become Focus Management's responsibility once they have been granted entry to the Focus Management Site and will remain so until they leave at the end of the day.

### ***Breaks/Lunchtime***

Post 16 persons in Vulnerable Groups are permitted to leave Provisions at their own risk during lunchtimes unless an alternative agreement has been made with the Employer due to particular persons vulnerability.

### ***Off-site Visits***

If arrangements are made for persons in Vulnerable Groups to travel to a location other than a Focus Management Site or their place of employment as part of their programme, a risk assessment will be completed – supervision will be at least at the levels outlined above and will be increased where necessary e.g. when visiting a large public space. Parental consent is confirmed via the standard form completed when the young person joins a programme.

### ***Incidents/Emergencies***

Should an emergency or incident occur at any Focus Management Provision the Site Management or any other member of staff will contact the Duty Manager immediately who will assess the additional supervision that may be necessary. This could include deploying additional staff, requesting Employer/Contractor support and/or contacting the emergency services.

### ***Visitors***

Focus Management's policy is that no visitors other than Focus Management members of staff and representatives of the Employer will be admitted to Provisions without prior arrangement.

Where it is necessary for trades-people or others to attend sites, they will not be left alone with persons in Vulnerable Groups at any time. There is a Visitor's Book at each Provision which will be completed for all non staff visitors.

### ***Monitoring and Review***

The Managing Director is responsible for ensuring that the requirements of this policy are being applied by all Provisions and for taking remedial action where required.

This policy is reviewed annually at which time the views of Focus Management staff, Vulnerable Persons, Employers and representatives of the Contractor will be considered and amendments made as agreed.

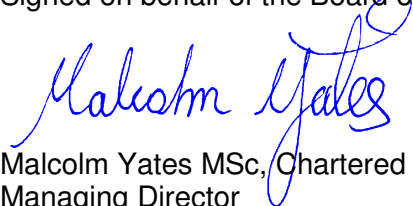
## **21. Other Policies**

This policy should be read in conjunction with the following documents:

Health & Safety Policy  
Risk Assessment Policy  
Fire Safety Policy  
Accident & Emergency Procedures  
Behaviour Management Policy  
Equality & Diversity Policy  
Safeguarding Policy & Procedures  
Criminal Records Policy  
Bullying Policy

**End**

Signed on behalf of the Board of Directors and Senior Management Team



Malcolm Yates MSc, Chartered FCIPD, FInstLM, FRSPH  
Managing Director