



TOLLCROSS  
housing association

## Aggression & Violence at Work Policy

Prepared By	Anne Wilson, Corporate Services Director
Policy Created	November 2014
Date of Last Review	25 <sup>th</sup> February 2019
Date of Current Review	15 <sup>th</sup> May 2023
Date of Next Review	February 2028
Reviewed By	Audit & Business Sub-Committee

### CORPORATE FIT

Internal Management Plan	✓
Risk Register	✓
Business Plan	✓
Regulatory Standards	✓
Equalities Strategy	✓
Legislation	✓



On request, the Association will provide translations of all our documents, policies and procedures in various languages and other formats such as computer disc, tape, large print, Braille etc. and these can be obtained by contacting the Association's offices.

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### **1. Background**

- 1.1 The likelihood of serious physical attack is not great for Association personnel; however, there has been a universally reported rise in incidents over the last few years and particularly in minor acts of verbal or physical aggression. Those most at risk are staff that deal regularly with members of the public who may, for a variety of reasons be angry, distressed, disturbed, ill, embarrassed or resentful. These feelings sometimes result in aggression or violence towards staff.
- 1.2 The Health and Safety Executive has indicated that where an employer has employees who could be exposed to the risk of assault, a systematic approach should be adopted to identify and as far as possible control the problem. The degree of risk for all employees must be assessed and the appropriate preventative measures identified.
- 1.3 This Aggression and Violence at Work Policy has been produced as part of a broad-based systematic approach to ensure that the associated procedures are adopted as standard throughout the Association.
- 1.4 There are three key areas where employers can have a substantial impact in the performance of that duty:
  - a) in the prevention of violence
  - b) dealing appropriately with violent incidents
  - c) monitoring and aftercare

### **2. Equalities**

- 2.1 An Equality Impact Assessment (EIA) has been carried out when reviewing this policy. In line with good practice the completed EIA will be published alongside the Aggression & Violence at Work Policy.

Where there is a need for follow-up action, the tasks and timeframe for achieving them shall be noted in the Equality and Human Rights Action Plan to ensure they are addressed.

We do not see this policy as having any direct impact upon the protected characteristics contained within the Equality Act 2010.

### **3. Risk Management**

- 3.1 The Association has considered the potential risks associated in implementing this Aggression & Violence at Work Policy. All staff are made aware of their right to be safe at all times and what action to take if applicable. Staff are invited to comment on the policy, make

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recommendations and are encouraged to attend relevant training events. Strict adherence to Health & Safety is promoted at all times.

#### **4. Definitions**

- 4.1 The Health & Safety Executive regards violence as “*Any incident in which a person is abused, threatened or assaulted in circumstances relating to their work.*” The Work Foundation states that violence at work “*can be demonstrated by the use of extreme force or fierceness at the place of employment.*” And that violent behaviour “*might be inflicted physically or mentally and can include abuse, threats, assault, brutality, cruelty or harshness.*”

#### **5. Legislative & Regulatory Framework**

- 5.1 All employers have a legal duty under Section 2(i) of the Health and Safety at Work Act 1974 to ensure so far as it is reasonable practicable, the health, safety and welfare at work of their employees.
- 5.2 When reviewing this policy the following Regulations and ‘good practice’ guidance have been considered: -
- a) Health & safety at Work etc., Act 1974
  - b) Management of Health & Safety at Work Regulations 1999, as amended
  - c) Reporting of Incidents, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)
  - d) EVH personal safety and violence at work information notes
- 5.3 Standard 4 of the Scottish Housing Regulator’s Regulatory Framework states: “The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation’s purpose.” More specifically and in relation to this Policy, Standard 4.3 states: “The governing body identifies risks that might prevent it from achieving the RSL’s purpose and has effective strategies and systems for risk management and mitigation, internal control and audit.”

#### **6. Commitment and Responsibilities**

##### **6.1 Management Committee and Leadership Team**

- a) The Management Committee of Tollcross Housing Association Limited acknowledges the risk of violence and aggression towards staff at work and affirms that such violence, threat of

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violence and aggression or verbal abuse is wholly unacceptable. It is the responsibility of the Committee to ensure that staff are provided with as safe a working environment as is reasonably practicable and that, where staff are subjected to violence, threat of violence and/or aggression they are provided with appropriate personal support. The Committee will ensure that all staff are aware of this Policy and related Procedures.

- b) The Committee acknowledges the important role of the Chief Executive, Directors and other staff, and designates the Chief Executive to implement this Policy and ensure all staff carry out the appropriate practices with regard to Health and Safety. It recognises that this act does not diminish its own responsibility under health and safety legislation.
- c) The Committee is not prepared to tolerate:
  - i. violent behaviour or verbal abuse between Staff or Committee members;
  - ii. severe verbal abuse or threat to their employees, tenants or themselves;
  - iii. verbal or physical harassment, including racial or sexual harassment, or harassment on the grounds of disability;
  - iv. physical assault by tenant or other members of the public, either during or outside working hours, arising from their employment by the Association.
  - v. attacks on or damage to the property of staff of the Association arising from or in connection with staff carrying out their duties.
- d) The Leadership Team shall review a Risk Assessment (Appendix 1) at least on an annual basis, with consultation at Staff training/meetings and this shall be presented to the Management Committee for approval. Recommendations for improvements shall be included in the risk assessment.

#### **6.2 Staff**

- a) Staff members are expected to assess situations where violence or abuse may occur and determine appropriate action. A range of options could include taking another member of Staff along or not arranging a meeting in the tenant's home.
- b) Staff are required to participate in reviewing the risk assessment (Appendix 1).
- c) Staff should feel able to remove themselves from a potentially

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violent/abusive situation and will receive support from the Leadership Team.

- d) Staff are required to declare their understanding and willingness to adhere to this policy in terms of protecting their personal safety.

## **7. Reducing the likelihood of Violence**

### **7.1 Risk Assessments**

7.1.1 Each year Staff members shall be asked to review the risk assessment and to propose amendments as necessary. Whilst this shall be done at least on an annual basis, should an incident occur that deems the risk assessment to be reviewed sooner, this shall be done and Management Committee informed.

7.1.2 The risk assessment shall cover the following areas for each site, where appropriate: -

- a) Reception
- b) Interview rooms
- c) Dealing with petty cash and cash payments in the office
- d) Dealing with transportation of cash to bank
- e) Walking between office premises
- f) Lone working
- g) Site visits & external area inspections
- h) Home visits (housing list & others)
- i) Void inspections
- j) Aggression/violence from colleague/Committee member
- k) Driving while on Association business
- l) Mobile phone use

### **7.2 Monitoring Return of Staff and Appropriate Action**

It is recognised that the majority of off-site visiting will be undertaken by Housing and Maintenance Staff. With this in mind, current practice is that Staff: -

- a) notify a member of staff in the office of their whereabouts and likely time for return (where there are multiple tasks being carried out, e.g. bank/estate management & void inspection, a list showing order of visits should be provided)
- b) take a mobile phone out with them
- c) carry a personal alarm (personal preference)
- d) call the member of staff identified at a) above, if they know they will be returning later than planned

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- e) receive a call from a member of Staff if they have not returned by the original time or the re-scheduled time
- f) inform a member of the Leadership Team should the other Staff member not answer calls
- g) inform the Police if after ½ hour the Staff member is still not contactable

The same action should be taken where a Staff member is working late or at weekends on their own and has agreed a start and finish time with a colleague.

## **8. Training**

- 8.1 Staff training, particularly for staff dealing directly with the public, will include information on:
  - a) how to avoid and/or defuse potentially violent situations
  - b) what support and help is available and how to summon it
  - c) what to do if threatened or attacked
- 8.2 Senior staff training and awareness will be pursued, including the following:
  - a) a review of the effectiveness of existing practice, procedures and systems where staff are, or feel, vulnerable in the workplace
  - b) within the Association
  - c) for staff working away from the Association on sites and home visits
  - d) a review of existing areas where staff meet the public to determine the need for and location of exit routes, alarm buttons, availability of potential weapons etc.
  - e) an understanding of the impact of fear, violence and harassment upon staff and their work performance.
  - f) the necessity of a sympathetic and clear response to incidents to encourage staff to approach management with concerns about safety.
- 8.3 Review of practice will form part of the risk assessment process, which carried out at least annually will be an ongoing process.

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### **9. Following an Incident**

- 9.1 Arrangements will be made immediately for appropriate first aid and medical assistance if required. Assistance will be provided in getting the victim home if that is appropriate.
- 9.2 Any violent or threatening incident must be reported to the appropriate Director and Health & Safety Administrator immediately and followed up in writing using the 'Incident Report Form' (Appendix 2). The Director will discuss the incident with the employee to determine whether the Police should be notified. The Director will notify the Chief Executive in a timely fashion and shall be responsible for preparing a report to Management Committee, who will decide whether any modification to work practices or procedures will be necessary.
- 9.3 The office may be closed to the public if necessary until the incident has been resolved.
- 9.4 In accordance with RIDDOR the Association shall report ALL violent incidents where a reportable injury has been sustained. In these situations where the affected party wishes the incident to remain private (e.g. in cases of sexual abuse), the employee's privacy rights shall be protected as the Association will report the incident as a "violent incident", without going into detail.
- 9.5 The employee must be allowed to discuss the incident and the Director should be available to do this as soon as the employee is able to do so. Debriefing should take place as soon as possible after the incident. The Director will make available where necessary professional counselling support for the abused staff.
- 9.6 The Committee is mindful that witnesses of the incident may also be emotionally affected by the incident. Where it is felt to be appropriate, support in the form of debriefing and counselling will be offered to them.
- 9.7 The Committee may take action against a tenant or client, where appropriate, by sending a formal letter warning of the consequences of future abusive behaviour. Where the circumstances are deemed to warrant it, the Committee will consider more severe action for persistent offenders.

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- 9.8 The Committee will determine what additional or alternative steps or procedures may be required in the light of the incident to ensure continuing staff safety.

### **10. Sick Leave Arrangements**

- 10.1 Sickness absence resulting from an assault during normal working hours will be registered as industrial injury absence. Periods of absence attributable to an assault will not, therefore, count against the employee's entitlement to sick pay.
- 10.2 Sickness absence resulting from an assault outside normal working hours will be classed as normal sickness for the purposes of the sick pay scheme. However, the Committee may decide, dependant upon the circumstances of the assault, to discount all or part of the period of absence when calculating the employee's future entitlement to sickness allowance.

### **11. Compensation**

- 11.1 Claims for personal injury following assault can be submitted to the Criminal Injuries Compensation Authority for payment. Guidance on eligibility under the Board's provisions, advice on taking a claim and application forms are available from the Health and Safety Administrator.
- 11.2 If a member of staff suffers a loss or damage to personal property as a result of assault, then a claim can be made in respect of such loss.

### **12. The use of Physical Force**

- 12.1 Physical retaliation may have serious consequences for staff, e.g. being charged with assault, being dismissed or being more seriously injured themselves. The Committee will only condone physical retaliation when it is used as a last resort, when the employee judges extreme danger to self or others and when escape from the danger is not possible. Even so, the force used must be within the meaning of 'minimum' and 'reasonable' in the circumstances, as stated in self-defence legislation.



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### **13. Monitoring and Review**

- 13.1 The Committee undertakes to monitor incidents via the health & safety incident report updates, provided quarterly by the H&S Administrator. In order to facilitate this, an incident reporting form must be completed for every potentially aggressive or threatening incident regardless of whether it has actually resulted in a physical assault.
- 13.2 It is the responsibility of all staff to ensure that an incident reporting form has been completed for each incident and that a copy is sent immediately to the Health & Safety Administrator.
- 13.3 The review of this information will allow any current or emerging trends to be identified and procedures and practices changed where necessary to improve the environment for both tenants and staff.

### **14. Policy Review**

The Aggression & Violence Work Policy shall be reviewed every four years or sooner as deemed necessary by the Management Committee.

### **15. General Data Protection Regulations**

Tollcross Housing Association will treat your personal data in line with our obligations under the current data protection regulations and our own Data Protection and Data Retention Policies and Procedures. Information regarding how your data will be used and the basis for processing your data is provided in Tollcross Housing Association's Transparency Statements.

### **16. Declaration**

The Association's Chairperson and Chief Executive shall sign the Declaration relating to the Aggression & Violence at Work Policy. Following this, all Staff shall sign the document, declaring that they have been made aware of the policy and will adhere to its requirements.

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**DECLARATION**

Chairperson ..... Date ..... Chief Executive .....Date .....

The undernoted confirm receipt of a copy of the Association's Aggression and Violence and Work Policy and undertake to ensure compliance.

Name	Signature	Date	Name	Signature	Date	Name	Signature	Date

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**APPENDIX 1**  
**RISK ASSESSMENT**

Duty/location	Risk	Current Measures	Additional Measures Required
Outer Reception area	Danger of assault/verbal abuse from visitors	<ul style="list-style-type: none"> <li>• Raised Reception desk</li> <li>• Wider counter</li> <li>• Panic alarms</li> <li>• Door locks</li> <li>• Glass screen to allow other staff to be aware of what's going on at reception</li> <li>• CCTV</li> <li>• Posters on display highlighting zero tolerance to abuse</li> <li>• Minimise objects that can be used as weapons</li> <li>• Terminate discussion if abusive/aggressive and inform Line Manager immediately</li> <li>• Call police if necessary</li> </ul>	
Reception area	Danger of verbal abuse and assault	<ul style="list-style-type: none"> <li>• Raised Reception desk</li> <li>• Wide counter in-between staff member and customer</li> <li>• Panic alarms</li> <li>• Glass screen for other members of staff to see if there are any incidents occurring</li> <li>• Key-pad on door entry</li> <li>• Posters on display highlighting zero tolerance to abuse</li> <li>• Minimise objects that can be used as weapons</li> <li>• Terminate discussion if abusive/aggressive and inform Line Manager immediately</li> <li>• Call police if necessary</li> </ul>	
Using the Interview Rooms	Danger of verbal abuse and/or assault	<ul style="list-style-type: none"> <li>• Panic alarms</li> <li>• Wide desk space between staff and customer</li> </ul>	

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		<ul style="list-style-type: none"><li>• Keep doors into main office space locked until room being used</li><li>• Posters on display highlighting zero tolerance to abuse</li><li>• Minimise objects that can be used as weapons</li><li>• Terminate discussion if abusive/aggressive and inform Line Manager immediately</li><li>• Call police if necessary</li><li>• If visitor known to be temperamental, interview with another staff member</li></ul>	
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Working alone in the office	Danger of assault when opening or locking up	<ul style="list-style-type: none"> <li>• Security lighting outside building</li> <li>• Personal alarms</li> <li>• CCTV (interview rooms &amp; outside building)</li> <li>• Mobile phones</li> <li>• Use common sense, i.e. if danger outside when leaving, do not leave and call police and if unsure about anything when opening up, wait for another member of staff</li> <li>• Report any lighting not working properly</li> <li>• If you become unwell contact either emergency services (depending on severity of illness) your Line Manager (contact a member of your family)</li> <li>• Call Police if necessary</li> </ul>	Refresher training on lone working for all staff.
Dealing with petty cash and banking	Possible robbery	<ul style="list-style-type: none"> <li>• Petty cash tin is locked in the safe and all money is handed out within the main office area (i.e. outwith public view) or the correct amount is taken out to reception for Committee, etc. picking up cash.</li> <li>• Banking is done at different times of the week/day.</li> <li>• Use 'decoy' handbag rather than personal (use personal at own risk)</li> <li>• For larger amounts of cash another member of staff escorts the finance staff, in line with Financial Procedures</li> <li>• Sign in sheet in discreet location for staff to highlight where they're going</li> <li>• Staff member(s) to be aware of time in line with 'monitoring return of staff' within this policy</li> </ul>	

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		<ul style="list-style-type: none"><li>• Take mobile phone and call office and use 'safe word' if necessary or call police (depending on severity of incident)</li><li>• If confronted for cash, always hand it over – do not try to be heroic!</li><li>• Staff are trained on and follow separate Banking and Cash in Transit Procedure</li></ul>	
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Home Visits	Danger of assault/ verbal abuse	<ul style="list-style-type: none"> <li>• Mobile phones for contact</li> <li>• Record on sheet &amp; to other member of staff where going &amp; for how long</li> <li>• Staff member(s) to be aware of time in line with 'monitoring return of staff' within this policy</li> <li>• Personal alarm</li> <li>• Protective clothing</li> <li>• Awareness training provided by Association &amp; common sense</li> <li>• Consider if visit requires two to attend</li> <li>• If you become unwell contact either emergency services (depending on severity of illness) your Line Manager (contact a member of your family)</li> <li>• Take mobile phone and call office and use 'safe word'</li> <li>• Call Police if necessary</li> </ul>	
External area inspections	Danger of assault/ verbal abuse	<ul style="list-style-type: none"> <li>• Mobile phones for contact</li> <li>• Record on sheet &amp; to other member of staff where going &amp; for how long</li> <li>• Staff member(s) to be aware of time in line with 'monitoring return of staff' within this policy</li> <li>• Do not move onto another task without notifying someone at the office</li> <li>• Personal alarms</li> <li>• Protective clothing</li> </ul>	

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<p>Site Visits &amp; Void Inspections</p>	<p>Dangers within properties (i.e. nails sticking out of walls/ flooring)</p>	<ul style="list-style-type: none"> <li>• Mobile phones for contact</li> <li>• Record on sheet &amp; to other member of staff where going &amp; for how long</li> <li>• Staff member(s) to be aware of time in line with 'monitoring return of staff' within this policy</li> <li>• Do not move onto another task without notifying someone at the office</li> <li>• Protective clothing (e.g. steel toe capped shoes)</li> <li>• Torches</li> <li>• Personal alarm</li> <li>• Be observant and vigilant of possible dangers (e.g. missing floor boards, exposed electrics)</li> <li>• Take mobile phone and call office and use 'safe word' if necessary or call police (depending on severity of incident)</li> </ul>	
<p>Aggression/violence from Colleague/ Committee member</p>	<p>Bullying, fighting, verbal abuse</p>	<ul style="list-style-type: none"> <li>• Report to Management (also complete incident sheet – Appendix 2)</li> <li>• Line Manager support, i.e. Mediation/Counselling available</li> <li>• All staff, committee, contractors aware of code of conduct and dignity at work policies.</li> <li>• If during Committee meeting, Chairperson will ask the person to leave the meeting and either Code of Conduct for Committee members or Staff Disciplinary procedures shall implemented.</li> </ul>	

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Driving while on Association business – using own car	Breakdown, theft or accident	<ul style="list-style-type: none"> <li>• Mobile phone (do not use while driving)</li> <li>• Record on sheet &amp; to other member of staff where going &amp; for how long</li> <li>• Staff member(s) to be aware of time in line with 'monitoring return of staff' within this policy</li> <li>• Association staff provide details of personal insurance that covers business usage.</li> <li>• Staff encouraged to have own breakdown cover and sign declaration annually.</li> <li>• Do not smoke while driving</li> </ul>	
Driving while on Association business – using Pool car	Breakdown, theft or accident	<ul style="list-style-type: none"> <li>• Mobile phone (do not use while driving)</li> <li>• Record on sheet &amp; to other member of staff where going &amp; for how long.</li> <li>• Staff member(s) to be aware of time in line with 'monitoring return of staff' within this policy</li> <li>• Insurance policy and breakdown cover in place and contained within handbook</li> </ul>	

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Mobile Telephones	No signal, battery run down or theft	<ul style="list-style-type: none"> <li>• Chargers in office &amp; at home</li> <li>• Office mobiles and chargers are provided by the Association (staff responsible for charging and Corporate Services Administrator/Receptionist responsible for charging pool phones)</li> <li>• Charge own personal phone as back up – used at own risk as adequate access provided to Association mobiles</li> <li>• Personal alarms to be used as alternative safety measure when in black spot areas.</li> </ul>	Consider different network and improved specification when replacing mobiles.
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**APPENDIX 2**  
**INCIDENT REPORT FORM**

<b>LOCATION:</b>	
<b>DATE:</b>	<b>TIME:</b>
<b>EMPLOYEE DETAILS:</b>	
<b>NAME:</b>	<b>ADDRESS:</b>
<b>DESIGNATION:</b>	
Briefly describe what you were doing at the time of the incident & explain in more detail below (e.g. Estate Management visits)	
<b>DETAILS OF PERSON(S) INVOLVED:</b>	<b>WITNESS(ES):</b>
<b>NAME(S):</b>	<b>NAME(S):</b>
<b>ADDRESS(ES):</b>	<b>ADDRESS(ES):</b>
<b>AGE:</b>	<b>AGE:</b>
<b>OTHER DETAILS:</b>	<b>OTHER DETAILS:</b>
<b>INCIDENT: (Give an account of the incident, including any relevant events leading to the incident – Continue on separate sheet if required)</b>	
<b>ANY OTHER RELEVANT INFORMATION: (i.e. sketch of location)</b>	