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# Employee Handbook of Company Operations – A Brief Overview

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***What we do and how  
we do it***

## **Aims and Objectives of the Company**

### **Our Mission Statement**

**To deliver safe, compassionate and personalised care and support to people in need so that they may continue to live at home and enjoy the benefits of independent living, community life and family.**

**To provide employment opportunities for dedicated professionals in a working environment which promotes dignity and respect, equal opportunities and fair rewards.**

**To be recognised within the local community as the provider of choice.**

### **Our Core Values**

**Every Client in our care has the fundamental right to:**

- be regarded as an individual and given our special attention at all times;
- be cared for by people who are capable of understanding their needs and competent to meet those needs;
- be treated equally, and no less favourably than others;
- receive respect and understanding regarding their cultural, religious and spiritual beliefs;
- receive prompt attention in relation to all of their healthcare needs;
- be safe, feel loved and always know that “someone cares”;
- be informed about all important decisions that affect them, and to have a say;
- be afforded privacy and respect for their belongings;
- have the opportunity to think independently, and make their own choices;
- complain about anything they feel is unfair or unjust, and to have that complaint listened and responded to.

### **Our aims:**

- a) To work with each Client, social workers, relatives, Care and Support Workers and all others associated with his/her care and support towards identifying, implementing and reviewing a Personal Care and Support Plan which adequately reflects his/her needs at any one time;
- b) To promote independent living, working initially within the Client’s range of abilities and competencies and striving to improve them;
- c) To deliver care and support in a manner which is non-discriminatory, sensitive to the cultural needs of the Client and respectful of their environment and traditions;
- d) To provide a flexible, responsive and non - intrusive service that is tailored to the needs of the individual;
- e) To ensure that confidential information is protected at all times and only shared with others strictly in accordance with the Company’s policy on Confidentiality.

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## **Assessment of Care and Support Needs and Requirements**

In most circumstances a representative of the Company will visit the Client before the commencement of service to discuss and agree the Client's precise care and support needs. Following this visit the Company will draw up a Personal Care and Support Plan and present this to the Client, together with an accurate assessment of the costs involved, the methods of payment etc. This information, together with the standard terms of business will constitute the contract between the Company and the Client.

## **Recruitment, training and assignment of Care and Support Workers**

The Company's recruitment processes for care and support workers include a personal interview, reference checking and criminal records checks with the Disclosure and Barring Service (DBS). The DBS check provides additional confirmation that you are not listed on a register of workers who are not permitted to work with vulnerable adults and/or children. (POVA and PoCA).

The Company's care and support workers receive training in relation to the responsibilities which are assigned to them and are assessed by the Company as competent workers. You are required to follow Policies and Procedures which are designed to ensure the highest quality of service to Clients, and to protect confidential information.

The Company recognises that care and support is best given when you and the Client have worked together for some time, and will try to ensure continuity in this regard. There will be occasions, however, (such as holidays, sickness etc.) when you may not be available. In such cases, an alternative care and support worker will be supplied.

## **Fees Payable**

Clients will be responsible for the payment of fees in respect of the services we provide to them, as described in their Personal Care and Support Plan.

Clients will be advised of the amount of these fees before the commencement of our services to them, and the basis upon which these fees are calculated, which will normally be either the time spent or the number of visits.

Verification of hours spent or the number of visits made will be by way of timesheets or the use of electronic call monitoring. Where timesheets are used to verify attendance we will ask that the Client signs the timesheet as an accurate record on every occasion a timesheet is presented to them.

Where electronic call monitoring is used to verify attendance by the Care and Support Worker, then we ask that permission is given for the Care and Support Worker to use the Client's landline phone upon arrival and departure. Calls made by the Care and Support Worker for this service are free. The Company will make separate arrangements in cases where a landline is not in existence.

The Care and Support Worker is not authorised to use a Client's phone for any other purpose, except to call the emergency services. If Clients allow the Care and Support Worker to use their phone, then the Company will not be responsible for their call charges or rental.

## **Hours of Operation**

The Company is proud to say that it operates 24 hours a day, seven days a week and 365 days per year! The Company's office is open between 8.30 am and 5.30 pm, Monday to Friday.

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## Insurance

The Company accepts no liability, howsoever caused, on behalf of ourselves, our servants, agents or contractors for any losses, costs, damages, claims or expenses in connection with our failure to provide our care and support services to a Client.

The Company has comprehensive Insurance cover in respect of Employer's Liability and Public Liability.

## Key Holding

On occasion, and solely in order to gain access to a Client's home to provide agreed care and support services, the Company may be given keys, or access codes. This will be done only after discussion with, and the agreement of, the Client, or his/her representative. Such arrangements will be recorded on the Client's Personal Care and Support Plan, and any other supporting documentation.

Each key in the Company's possession will be marked so as to identify it to a particular Client. Information will be entered onto a database or register identifying the address the key belongs to and the number of keys in possession by staff. The Company will also keep a record of who has possession of keys at any one time. Keys will not have information on them which specifies the addresses of individual Clients. It will not be possible, therefore, for a lost key to be used to gain access to a Client's home.

## Nature of the Services Provided

Although we do not provide nursing care, we can offer Clients a very comprehensive range of care and support services. The delivery of these services starts with a discussion with the Client, usually in their home on the help they need. This process is called initial Assessment, and is usually undertaken by one of our senior staff members. Where an Assessment has already been undertaken (for example by a representative from the Local Authority) then this will form the basis of our discussion.

**Examples** of the kinds of services we are used to providing include:

**Personal care and hygiene** - assisting with dressing, undressing, (getting up and going to bed) washing, bathing, showering, shaving, oral hygiene, the taking of medication etc.

**Personal services** - shopping, arranging appointments, accessing local services, arranging for prescriptions, helping maintain social and family contacts, accompanying you on visits and medical appointments, letter writing, managing correspondence, caring for your pets, providing companionship etc.

**Maintaining continence** - assisting with toileting and the use of incontinence aids.

**Food preparation** - preparing snacks/meals and assisting with eating/drinking.

**Domestic services** - shopping, pension collection, laundry, light cleaning etc.

## Quality of Service

The Company is judged by its Clients, Clients' families, other important stakeholders and the Care Quality Commission (CQC) on its merits. The Company's expectations, in respect of the quality of the service it delivers are high. It is essential, therefore, that the views of those at the receiving end of care and support, and those closely associated with them, are known. This translates into the very purpose of the Quality Assurance programme – to establish:

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- a) How well we are doing;
- b) How we can improve.

### **Informal Processes**

All employees of the Company are encouraged, when in contact with Clients, their representatives or family members, to ask their views on how care and support is being delivered, and to what level of satisfaction. This allows the Company to maintain a constant “finger on the pulse” so to speak, and to remove any known areas of dissatisfaction without unnecessary delay.

### **Formal Processes**

The Company will ask the views of Clients, family members and staff on a regular basis using questionnaires in order to gain feedback on how well it is doing. These questionnaires are based upon how the Company is performing during the delivery of service. Our approach is to use the questionnaires to identify with quality statements which we have devised and seek a response from the individual completing the questionnaire as to how they relate to the statement.

## **Records**

It is imperative that the conduct of business undertaken by the Company is properly recorded in accordance with established good practice and regulatory requirements such as the General Data Protection Regulations and the Data Protection Act 2018. These refer to the collection, maintenance and disposal of personal and sensitive personal data, and the need to provide privacy notices to both Staff and Clients in order that they understand what information is being kept about them, and the purposes for which the information is kept. All Clients and Staff will be given the opportunity to give, or withhold consent as they wish.

All personal data obtained and held by the Company, and relating to both Clients and Staff 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 GDPR procedures for international transferring of personal data, where appropriate and relevant.

## **Refusal/Withdrawal of Service**

There may be circumstances arising where we have to consider the temporary or permanent withdrawal of service. These include situations such as: failure to pay our invoices for the services we provide; persistent lateness in the payment of such invoices; failure by the Client or any other person to provide or maintain a safe working environment and/or appropriate equipment; unlawful discrimination; extreme alcohol consumption; unreasonable behaviour or requests to our Care and Support Worker to undertake unreasonable or illegal activities.

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## **Review of Health and Safety Assessment and the Personal Care and Support Plan**

The Company will review the Health and Safety Assessment annually, or whenever an accident or an untoward incident takes place. The Personal Care and Support Plan for the Client will be reviewed in accordance with a schedule agreed between the Company and the Client or when circumstances dictate that this should be undertaken.

## **Supplies and/or Equipment**

The Company does not provide any supplies or equipment in connection with the care and support services which are to be undertaken unless this has been specifically agreed with the Client. You need to advise the Client when equipment is needed or supplies need to be replenished.

## **Vetting of Staff**

The Company is responsible for the care and support and safeguarding of some of the most vulnerable people in society. This responsibility is undertaken through its workforce of devoted and dedicated individuals who show exemplary qualities of care and compassion. Our ability to feel confident that our employees possess these, and other important qualities, is because we take our recruitment seriously. This includes exercising sound judgement, and undertaking checking procedures available to and required of us, such as taking up references, confirming qualifications and experience, and ensuring that no individual offered employment with us has either a criminal record which is serious enough for us to withdraw or is someone who is on a list of individuals who are barred from working with vulnerable adults or children, and whose employment would be illegal.

Criminal record checks, together with checks on barred lists, are made through the Disclosure and Barring Service (DBS). The Company will make relevant DBS checks on all prospective employees occupying qualifying positions.

***Keeping you and  
your Clients Safe***

The Company provides homecare. Our Clients are often elderly, live alone, and are vulnerable. We may be the only visitors on any particular day. Our service is often an essential lifeline to the outside world. As such, it is imperative that when we visit, in order to provide services, we are able to gain access, and if not, to question why, and deal with the situation professionally and without delay.

## **Gaining access to a Client's home**

The preferred method for gaining access to a Client's home will be to knock on the door, and to request and gain entry with the permission of the Client. Where the Company has been given keys, or access codes, then the Company's Care and Support Worker will announce their arrival by ringing the bell or knocking on the entry door prior to opening. Where the Client is deaf, or otherwise incapable of indicating their willingness to, and acceptance of, the Care and Support Worker's entry, then some other approach will be agreed and adopted at the time the service begins. Entry without permission is only acceptable in a clear emergency situation or where there are concerns regarding the safety of the Client.

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### **No answer**

In the event of not being able to gain access to a Client's home at a time that they are due to deliver care or support or have a pre-planned appointment to see the Client but they are not answering the door the Care and Support Worker should without delay:

1. Check all the doors (one might be unlocked), look through windows and call out through the letterbox.
2. If the Client can be seen or heard, but appears to be in difficulty, then the Care and Support Worker must contact the emergency services immediately, inform them that a vulnerable person is at risk and then contact the office to notify the situation.
3. The Care and Support Worker must make a note of the time of initially trying to gain access and the time of the call to the emergency services.
4. The Care and Support Worker must remain at the Client's property until the emergency services arrive.
5. If the Client cannot be seen or heard then the Care and Support Worker should in the first instance contact the Company office who will try telephoning the Client.
6. The Care and Support Worker can also speak with neighbours to establish whether they are aware of the Client's whereabouts whilst being mindful of confidentiality.

If it is not possible to gain useful information as to the whereabouts of the Client, and the Company's Care and Support Worker has reason to believe that the Client is in the home, but is incapable of answering, then the Care and Support Worker is advised to seek further advice from the office. This situation may escalate to contacting the emergency services and/or the Police.

### **Security issues**

The Company's Care and Support Workers are required, upon leaving the Client's home to:

- a) Check with the Client that they are comfortable;
- b) Confirm the date/time of the next visit;
- c) Advise the Client if there is to be a change of Care and Support Worker, either on a permanent or temporary basis, and provide details.

### **Accidents**

To ensure that any accidents, incidents and near misses are recorded, correctly investigated and, where appropriate, reported to the relevant authorities, the Company will:

- ensure that a clear accident, incident and near miss reporting protocol is communicated throughout the Company;
- appoint a responsible person who will report reportable accidents/incidents/near misses to the relevant authorities;
- ensure all accidents and incidents are recorded in the accident book;
- investigate all accidents and incidents fully, to establish their root cause and to develop new procedures to reduce recurrence;
- review accident and incident statistics periodically, to identify trends;

## Control of Infection

Infectious diseases are caused by biological agents, that is, viruses, bacteria, fungal spores and other micro-organisms. These biological agents can be:

- Airborne;
- carried by animals;
- carried by other humans;
- present in manufacturing processes;
- present in water systems.

Infection control is the discipline concerned with preventing the spread of infection within the workplace and protecting those working in close proximity to potential sources of infectious substances.

To ensure that infection control procedures are in place and managed in compliance with relevant health and safety regulations, the Company will:

- assess, reduce and control the risks associated with possible infections in the workplace;
- provide appropriate information, instruction and training for employees who may be exposed to possible infections;
- assign to a senior member of staff the responsibility for investigating and recording accidents, incidents and near misses relating to infection control, and to ensure that reports are made as required;
- provide the senior members of staff with 24-hour access to advice on infection prevention and infection control;
- keep appropriate records.

## Gifts, Wills and Bequests

The Company's reputation is based on a number of factors, with quality of service, integrity, honesty and professionalism being of the highest importance. It follows that any act which might cast doubts about the Company's behaviour in relation to these factors is to be deplored.

The following behaviour is unacceptable:

- accepting any financial or other reward from any person in return for providing some favour;
- requesting a financial or other reward from any person in return for providing some favour;
- offering any financial or other reward from any person in return for providing some favour.

## Handling Client's Money

The Company actively promotes and encourages Clients to be as independent as possible in respect of their care and support needs, including handling their own financial affairs wherever possible. Some Clients, however, may seek assistance in some respects, and if this is the case then the assistance to be provided will be discussed and agreed with the Client at the outset and fully documented in the Client's Personal Care and Support Plan. Assistance will be provided on a sound, open, honest and transparent basis and the highest standards of probity are to be followed at all times.



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## First Principles

1. The Company will never promote or seek to provide assistance with handling a Client's finances.
2. Any assistance given will be at the request of the Client, in every instance, and fully documented.
3. The Client's inability to handle his/her own financial transactions will be reviewed on a regular basis, and the Company will withdraw from providing assistance as soon as the Client wishes.

## Health and Safety Assessment

Before commencement of service, the Company will undertake a health and safety assessment of the Client's home in order to identify any specific hazards which may be present, and which may present a risk to your health, safety or welfare. Where hazards are identified then a risk assessment will be completed and where necessary, advice given as to correction and maintenance. The Company will not permit staff to engage in any activity where a hazard is present, and the risk has not been eliminated or reduced to an acceptable level. In some instances, this may require service to be withheld or suspended. You are required to be vigilant at all times regarding health and safety matters, and to report any situation, incident or occurrence which causes you concern.

## People Moving and Handling

To ensure that manual handling activities are undertaken safely and that safe systems of work are clearly understood throughout the Company, we will:

- identify all manual handling tasks and situations where there is a risk of injury;
- avoid manual handling tasks, wherever practicable;
- assess and reduce unavoidable risks;
- provide employees with adequate information, instruction and training to enable them to perform their work safely;
- ensure that adequate resources are made available to fulfil the requirements of this policy;

## Personal Safety

You generally work alone. Lone working can be satisfying and rewarding, but carries risks. The Company has a significant obligation to do all that it can to protect the safety of its Care and Support Workers whilst carrying out their duties, and its policy on lone working provides a wealth of advice and guidance which will help achieve this aim. The Company employs many lone workers (referred to hereon as Care and Support Workers) who carry out essential tasks within the community. Care and Support Workers are subject to the same risks as any other worker – however for Care and Support Workers the risks are greater, as working alone increases vulnerability. Combine this with the fact that the great majority of Care and Support Workers are female, and in uniform, then the subject of lone working reaches even higher significance, for the Care and Support Worker, and for the Company, which must do all it can to minimise the risks involved, and ensure the health and safety of its employees.

The duty of care owed by the Company to its employees is complimented by the duty each employee has to take reasonable care of themselves and other people affected by their work activities and to co-operate with their employers in meeting their legal obligations. The Company will confirm with each member of staff that from a medical perspective (physical and mental) they are capable of working alone. Where necessary, the advice of a medical practitioner will be sought. The Company will ensure that adequate insurance is arranged to cover the risks involved in lone working.

## Protection from Abuse

The Company understands and fully accepts its responsibility towards protecting the safety and well-being of everyone associated with its operations, including Clients (irrespective of age), staff and suppliers on a non-discriminatory basis.

The Company's policy of zero tolerance towards abuse, maltreatment or neglect of any kind requires everyone who is employed or engaged by the Company to accept a personal responsibility to ensure that any action, by anyone, which may be considered to be abusive is reported without delay in order that it may be properly investigated, and appropriate action taken. Any abusive action by an employee of the Company will result in most cases, in their dismissal and reporting to the appropriate regulatory authorities and possibly the police. The Company's policy on safeguarding will compliment but not override the local multi-Company policies and procedures for tackling abuse which apply to the Company's Clients.

## Protective Clothing

Care and Support Workers are instructed to wear disposable protective clothing when undertaking any procedure which might result in the spread of infection, and to dispose of it in accordance with instruction and training.

## Safe Working Practices

Risk Assessment is the key to safe working practices. A risk assessment is nothing more than a careful examination of what, in our work and environment, could cause harm to people. It enables us to weigh up whether we have taken enough precautions or should do more to prevent harm.

Risk assessments help us focus on the risks that really matter in our workplaces: the ones with the potential to cause harm. In many instances, straightforward measures can readily control risks. The law does not expect us to eliminate all risk, but we are required to protect people as far as is reasonably practicable. Accidents and ill health can ruin lives and affect our businesses if output is lost, machinery is damaged, insurance costs increase or we have to go to court. There is a general legal requirement to carry out suitable and sufficient risk assessments of all activities undertaken by an organisation. If there are five or more employees and there is a significant risk to the health and safety of those employees, or any others, the risk assessment must be recorded.

To ensure that all activities are undertaken safely in accordance with the risk assessment process the Company will:

- ensure that suitable and sufficient risk assessments are carried out on all risks to the health and safety of our employees that they are exposed to while at work;
- ensure that these risk assessments take into consideration persons not in our employment but who could be affected by risks to their health and safety, arising out of, or in connection with, our undertakings;
- provide such information, instruction, training and supervision as is necessary to ensure all staff undertaking risk assessments understand the process;
- ensure that adequate resources are made available to fulfil the requirements of this policy.

## Smoking etc. on Duty

It is the policy of the Company that all our workplaces are smoke-free, and all employees have a right to work in a smoke-free environment. Smoking is prohibited in all enclosed and substantially enclosed premises in the workplace.

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This includes Company vehicles. This policy applies to all employees, contractors, consultants, temporary workers, visitors or volunteers. Care and Support Workers employed by the Company are strictly forbidden to smoke in front of Clients and on their premises. Clients are asked that they do not smoke in front of the Company's employees.

### **Non-compliance**

Disciplinary procedures will be followed if a member of staff does not comply with this policy. Those who do not comply with the smoke-free law may also be liable to a fixed-penalty fine and possible criminal prosecution.



***Observing good  
practice***

## **Administration of Medicines**

The Company and its Care and Support staff - Understanding our joint responsibilities

We, the Company, will:

- Promote the safe administration of medicines within the service, and ensure that all staff are aware of, understand, and abide by the requirements of its formal policy;
- Underpin the safe and correct administration of medicines by the completion of a Medication Administration Record (commonly abbreviated as a MAR chart), by an appropriately experienced and trained individual, for every Client requiring assistance with the administration of medicines, and this is located in the Client's home.
- Ensure that systems are in place to communicate changes to the MAR chart to those charged with responsibilities for care and support;
- Communicate with other parties involved in the delivery of care and support to the Client so as to promote a seamless service where everyone understands their individual roles and responsibilities, and are advised of changes to a Client's medication needs, and their plan of care and support, etc.
- Evaluate the training needs of all staff delegated with the responsibility for administering medicines to Clients upon entry (induction), and in response to changing needs and circumstances;
- Provide training to satisfy these needs;

## **Autonomy and Independence**

The Company will assess, plan, deliver and review the care and support services it provides to Clients with a view at all times to promoting autonomy and maintaining/increasing independence.

## **Complaints and Suggestions**

The Company strives to achieve the very best outcomes for its Clients all of the time. However, on occasion, things can go wrong, and as such, may be the subject of a complaint. If they do, we need to know about it so we can put it right, learn from our mistakes, and implement organisational, procedural or operational changes so as to reduce the potential for complaints in the future. It is the Company's commitment to:

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- always take complaints seriously and investigate them fairly;
- deal with complaints according to this procedure, unless they are relatively minor;
- treat complaints confidentially;
- never discriminate against a Client for making a complaint;
- ensuring that Clients know of the existence of this policy, and how to make a complaint if they wish to do so.

Complaints may be made directly by Clients, or they may be made on behalf of a Client if the Client is unable or unwilling to undertake the process alone.

## **Confidentiality**

The Company understands and accepts its legal, moral and ethical duty to protect information which is confidential to its Clients, employees and all others with whom it comes into contact during the course of its operations.

The Company makes a commitment to ensuring that personal data, including special categories of personal data is processed in line with GDPR and domestic laws and all its employees conduct themselves in line with this, and other related, policies. In line with GDPR, the Company understands that it will be accountable for the processing, management, regulation, storage and retention of all personal data held in the form of manual records and on computers.

## **Diversity in Care**

The Company is committed to providing employment opportunities and services to Clients on an equal and fair basis, and commits to follow the codes of practice published by the Equality and Human Rights Commission in respect of its legal obligations. These obligations protect people from unlawful behaviour, such as, for example, discrimination, harassment, or victimisation on the grounds of:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion and belief;
- Sex;
- Sexual orientation.

The above are defined as “protected characteristics”, and the Company will seek to establish and maintain fair treatment for everyone who works for the Company, those to whom the Company provides services and those who supply goods and services to the Company. The Company expects everyone associated with the business to behave entirely within the law, and gives zero tolerance to inappropriate behaviour. Everyone must be treated fairly, with dignity and with respect.

The commitment from every employee in the Company to the aims and ideals of fostering equality is fundamental to our success, and any employee who feels that these ideals are not being adequately followed is required to make his/her feelings known without delay so that corrective measures, where necessary, can be implemented. Employees who discriminate unfairly may be subject to disciplinary action and sanction, which may include dismissal

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## **Dress Code**

The personal appearance and cleanliness of employees makes an important contribution to the Company's reputation and image, as well as supporting high standards of health and safety.

If you are required to wear a Company uniform you must do so at all times during your hours of work. All uniforms must be kept clean, in good condition and worn in a presentable fashion. No item of the Company uniform may be altered without prior approval. You must return your uniform in a reasonable condition on termination of your employment. The Company retains the right to deduct the cost of any uniform that is not returned, or is returned in a damaged condition due to your neglect, from your final pay.

## **Conduct at Work**

The Company's success, image and reputation are heavily influenced by the attitudes and behaviours of its employees.

You must:

- maintain satisfactory standards of performance at work;
- comply with all reasonable management instructions;
- co-operate fully with your colleagues and with management;
- ensure the maintenance of acceptable standards of politeness;
- take all necessary steps to safeguard the Company's public image and preserve positive relationships with all persons and organisations connected to the Company;
- ensure that you behave in a way that does not constitute unlawful discrimination;
- comply with the Company's operating Policies and Procedures.

## **Dignity and Respect**

### **Dignity and Respect – what it means to the Company and its employees**

The SCIE ten-point Dignity Challenge outlined in their Dignity in Care Guide outlines the key aims in respect of providing a dignified care service, and is endorsed by the Department of Health.

The ten points are:

- 1) Have a zero tolerance of all forms of abuse;
- 2) Support people with the same respect you would want for yourself or a member of your family;
- 3) Treat each person as an individual by offering a personalised service;
- 4) Enable people to maintain the maximum possible level of independence, choice and control;
- 5) Listen and support people and enable them to express their needs and wants;
- 6) Respect people's right to privacy;
- 7) Ensure people feel able to complain without fear of retribution;
- 8) Engage with family members and Care and Support Workers as care partners;
- 9) Assist people to maintain confidence and a positive self-image;
- 10) Act to alleviate people's loneliness and isolation.

The Company will apply the above principles in ensuring that it provides care and support in a dignified, compassionate and respectful manner at all times.

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## **Whistleblowing**

As an organisation where the highest standards of integrity and trust are expected by our Clients the Company is committed to maintain exemplary levels of honesty, openness and transparency in all its dealings and actions. Therefore, the Company treats unprofessional conduct very seriously, whether it is committed by managers, employees, suppliers or contractors.

It is recognised that an employee may find it difficult to raise concerns of malpractice or misconduct. The Company will provide, however, a means to raise any concerns so that they can be investigated properly, sensitively and in confidence. The Company also recognises the need to ensure any employee is protected from receiving or suffering any disadvantage as a result of raising a concern in good faith.

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