



Cause for Concern Procedure

1. Introduction

The aim of this procedure is to provide guidance for staff and managers who work within our front-line security services, predominantly in operational roles (e.g., security guards, patrol officers, CCTV operators, door supervisors, etc.). It is a mechanism to report any type of concern, including possible threats, vulnerabilities, or safety issues, detailing what you should do when you have a cause for concern. This aligns with ACS standards for risk management and staff responsibilities.

This procedure operates alongside CAPITAL SHIELD SECURITY LTD's health and safety, safeguarding, security, and SIA compliance policies and procedures. It reinforces CAPITAL SHIELD SECURITY LTD's approach to protect the welfare of any client, site occupant, or anyone they come into contact with whilst at work (adult, child, young person, or colleague). It sets out the responsibility of every member of staff of CAPITAL SHIELD SECURITY LTD AND those who work for and with us:

- to be aware of issues which may indicate that a person or site could be at risk or subject to harm/threat
- or requires assistance
- to tell their manager immediately (or another manager if their own manager is not available or if there is any concern about the manager) if any cause for concern comes to their attention
- never to turn a blind eye

These procedures apply to our own direct staff and those working with us and for us who are also in a position of trust e.g., subcontractors, service providers, agency staff, volunteers, apprentices, with the level of awareness and training being proportionate to different roles and levels of responsibility. All staff must hold valid SIA licences where required, in line with ACS criteria.

In respect of those who work with/for us, these procedures should be provided and followed as part of working in partnership with CAPITAL SHIELD SECURITY LTD unless the service provider has their own procedures in place. If so, we would expect that the same principles to be applied and implemented as set out in this document, ensuring compliance with SIA regulations.

Those that work for our clients on a more formal arrangement including those commissioned by local authorities, management agents, other security providers, etc., should have their own procedures in place and they should follow their own organisation's procedures, while adhering to ACS standards where applicable.

2. WHAT ARE CAUSES FOR CONCERN



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Cause for Concern is to be used to record any issues that come to a member of staff's attention, supporting ACS requirements for incident reporting and risk assessment.

Specialised security services (e.g., high-risk sites or close protection) do not require the use of Cause for Concern procedures, as there are already arrangements in place, given the nature of the services provided:

- All concerns are logged, actioned, and monitored via incident reports & ongoing security monitoring records.
- Where a third-party organisation is providing the security directly to the client, the same principles would apply, that they would log, deal with, and record action taken in security records.

Concerns could include situations such as:

- A client, site occupant, or member of the public who appears vulnerable and may need help or additional support.
- The safety or security of a site, client, or individual.
- Potential abuse, harm, or risk to anyone on site.
- Experiencing neglect or self-neglect, this could include things like unsecured premises, dishevelled individuals, poor site conditions.
- There may be risk to our staff, clients, or visitors at a site.

3. EXAMPLES OF CONCERNS

A concern can be anything you hear or observe including:

- A child who appears unsupervised or at risk on site
- Abuse/harm or risk of abuse/harm against anyone on site
- A vulnerable adult who appears distressed or neglected
- Unsecured or neglected premises
- Evidence of substance abuse (e.g., drug paraphernalia)
- Dangerous animals or wildlife on site
- Fire hazards or safety breaches



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- Hoarding or clutter posing risks
- Gas or electrical hazards
- Expressions of suicidal tendencies
- Individuals struggling to cope
- Persons displaying suspicious or extremist behaviours
- Reports of threats or intimidation

This is not a definitive list but is to provide guidance only. Possible risks of harm or concerns are hard to define and are often subtle and not explicit, and concerns may come to light without anything being specific or tangible.

There is an expectation that all CAPITAL SHIELD SECURITY LTD staff and those who work for us use their common sense. Obviously, there is a careful balance between being seen to interfere versus being sensitive but vigilant and never afraid to voice a concern. Overall, the guiding principles are to:

- Never turn a blind eye
- Always err on the side of caution – it doesn't matter if the concern turns out to be unfounded
- Discuss any concern, however “small” with a manager.

The responsibility for making a decision about the issue, and subsequent action taken, rests with Operations Managers, not the individual member of staff or person who has raised the concern.

4. WHO DEALS WITH CAUSES FOR CONCERN

Within CAPITAL SHIELD SECURITY LTD, the lead service in dealing with concerns, including those which could be of a safeguarding or security nature, is our Operations Department. Who will oversee all concerns relating to the wellbeing, welfare, or potential risks to adults, children, sites, and staff and will make decisions about what to do with concerns, on behalf of all Managers. This structure supports ACS standards for effective management and accountability.

The Operations Department referred to include the following teams: Site Security, Patrol Services, Risk Assessment, Incident Response, Compliance, Training. For the purpose of these procedures, hereafter Coordinators and Service Managers referred to as **Operations Manager**. Managers who oversee concerns fall only within the context of the named teams.

Staff across the organisation have different levels of responsibility in terms of raising concerns:



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- **Front line staff** – who, through contacts with clients or sites, may have a concern about that site or individual. If so, the member of staff has a responsibility for raising their concerns by telling their manager or another manager if own manager isn't available or possibly connected to the concern. We refer to staff who may spot, see or hear something that causes them to have a concern as our **reporting staff**. Front line staff will be expected to contact their line manager at the earliest opportunity and give as clear and objective account as possible of their concern. All front-line staff must comply with SIA licensing requirements.
- **Line Managers** must ensure concerns are discussed through and notes taken and then immediately reported to a Coordinator or Manager in the Operations Department (**this will depend on the nature of the concern**). The line manager of the reporting staff should do so in a way that supports the principle of "passing the baton not the buck". So that the Operations Manager receiving the concern has as clear and objective picture as is possible ie by the line manager talking through the concerns first with the reporting member of staff, clarifying as much as possible about the reason for the concerns and any relevant information and supporting the member of staff to make a record about their concerns. **Front line staff must never be left to deal with concerns of harm (actual and suspected) on their own and must also be given reassurance that they have done the right thing by raising their concern (as even if it turns out to be unfounded, it is the right thing to do) and that their concern will be looked into, including explaining what will happen next.** All Managers are responsible for ensuring Cause for Concerns are raised correctly in the incident logging system, in line with ACS record-keeping standards.
- **Operations Managers** - responsible for overseeing that concerns are dealt with appropriately and in a timely manner. This includes Coordinators who have day-to-day operational responsibility for their team or Service Area as well as service managers.
- **Security Team** – the team comprises our Security Manager and Security Coordinator. The team can be contacted on matters relating to concerns about wellbeing or risks and will provide advice and support to staff and managers about what to do if not sure or not confident or sometimes if the manager just wants to run something past another colleague. The Security team is available to support staff, Managers and the HR team at any stage of the process, ensuring alignment with SIA and ACS guidelines.

5. WHAT TO DO IF YOU HAVE A CONCERN

When any CAPITAL SHIELD SECURITY LTD employee or person that works with/for us, in the course of their job, comes across anything that gives them cause for concern or suspects or is aware of actual harm, they must:



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In an Emergency

- Telephone emergency services via **999** for assistance. This could be if a crime is being committed or if someone needs medical attention or is in danger.
- Staff are never expected to put themselves in danger or at risk and again should contact **999** for assistance if necessary. This complies with ACS standards for staff safety.

Next Reporting Steps

- All staff have a responsibility to communicate concerns with clients or individuals, where it is safe to do so. This is to ensure both an open and honest approach, sets out clear expectations for the client and supports our Operations colleagues who lead on dealing with concerns to be transparent when following up on concerns.
- Front line staff should follow the **Starting the Concern Conversation guidance (see Appendix 2)** to ensure a consistent approach is taken, where concerns are identified.
- Concern must be discussed verbally, with their immediate line manager **the same day** (or immediately if the concerns are felt to be of a serious nature)
- If their line manager is absent or is not contactable, then contact should be made with whoever is covering for them.
- Where it has not been possible or appropriate for staff to communicate a concern with the individual, Line Managers must agree with individual staff members how concerns are to be communicated.

This can include:

- Supporting the individual staff member in making contact the same day, soon after the incident, or
- where appropriate Line Managers making contact to relay the concerns identified
- Agree next steps ie, that a concern will be raised with Operations colleague who will be in contact to gather information, provide assistance or signposting where appropriate.
- This must happen prior to the Cause for Concern being raised with Operations colleagues **UNLESS** the member of staff has concerns that there is serious risk of harm.



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- Contact should be made with a Senior Manager and/or a member of the HR team, if the person who has the concern has any worries about their Manager being involved or that their manager is not dealing with the concern.
- This conversation should not be any later than 24 hours.

We do need to have written records to capture information as clearly as possible. **This comes after the initial concern has been raised verbally.** Records must comply with GDPR and ACS standards for data handling.

Information needs to be **followed up in writing** this can be in one of the following ways:

- **Incident Logging System** – Cause for Concern – it is important to note that some systems may not report directly, therefore all Managers are responsible for inputting these manually if needed.
- **Use a Cause for Concern Card** – these are often handwritten and are only issued to subcontractors.
- **By e-mail**
- Details written onto a Word document, which can then be e-mailed.

CAPITAL SHIELD SECURITY LTD “Cause for Concern Card” (Appendix 1), this Card is generally to be used by those that would not normally be involved in dealing with security matters, for example, non-site based frontline staff or other subcontractors, ancillary service providers attending at sites. The Cause for Concern Card can be used for any concerns, including but not limited to eg any harm/threat to anyone on site including children, a person appearing neglected/distressed, neglected premises, evidence of excess use of alcohol or illegal substances, dangerous or neglected animals.

Line Managers are responsible for:

- Alerting the relevant Operations Manager IMMEDIATELY – no later than the same day. This should be done by telephone in the first instance.
- Never rely on sharing information electronically (e-mail/system) to pass on the concern in the first instance, without speaking to someone. Information passed electronically can be overlooked or missed.
- Providing additional support with the reporting member of staff, to ensure all the information is captured and the concerns are passed correctly to an Operations Manager.



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- If the Operations Manager you have tried is not available, another Manager should be contacted immediately or the Security team. If none of the Operations Managers are available, then contact a Senior Manager or the Security Team.
- If Managers do not have the confidence that the Operations Manager has acted appropriately, then they should contact the Security team.
- All Line Managers are responsible for inputting their initial information into the incident logging system about the concern, following User Guidance – how to raise a cause for concern.
- The Operations Manager will record information relating to the concern onto the system, with respect of their involvement beyond the concern being raised.

Subcontractors and other partners who work for and with CAPITAL SHIELD SECURITY LTD are also in a position of trust. In line with ACS rules, subcontractors must be ACS-approved where possible, or approved in writing by SIA if not.

Procurement processes should ensure those who may be appointed to work for us understand their responsibilities in reporting Causes for Concern and have procedures in place. Where procedures are not in place, CAPITAL SHIELD SECURITY LTD's procedure should be adopted. The appointing Manager is responsible for making sure procedures are in place, including verification of SIA licences.

6 TYPICAL OUTCOMES

A concern will be based on the facts and information available at the time. Some examples of what might happen after a concern has been raised are listed below:

- A site visit or follow-up to talk things through with the person or client whom the concern is about to see if they need any help or additional security measures.
- Contact with statutory services, often Police, Local Authorities, or Social Services to see if they have any more information to build up a better picture.
- If there are serious concerns of risk/harm to a child, young person or vulnerable adult, then a safeguarding referral will have to be made to the relevant Local Authority, in line with CAPITAL SHIELD SECURITY LTD's procedures. This may result in a multi-agency meeting to assess the risk and what can be done to minimise the risks.
- If there are concerns about immediate risk or that a serious crime may have been committed, then contact has to be made with the Police (via emergency services call 999). All staff members are responsible for contacting emergency services, in case of an emergency.



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- The Operations Department will take the lead on all concerns, including any concerns about harm or threats (in line with our procedures), as they are best placed and receive in-depth training in dealing with security issues, meeting ACS training standards.
- The Lead Operations Manager should acknowledge to the reporting member of staff that their concern has been received and make assurances that they will deal with the concern in accordance with our policies and procedures, including security protocols if the concern is about threats or harm.

7 FEEDBACK & SHARE LEARNING

To ensure that we communicate effectively and work as one team together, it is important that assurance is given to the reporting member of staff that their concern is being looked into and this should be done within 2 days of receiving the concern, by the Manager/Coordinator leading on the concern.

Feedback should also be given to the reporting member of staff and their line manager of the outcome. It will often not be appropriate to go into detail for reasons of confidentiality. However, it is good practice to inform colleagues of the outcome and again to reassure that they did the right thing by raising the concern. The feedback may also include any learning points, both positive or any areas for improvement, supporting ACS continual improvement.

If there is any learning to be shared from the concern, the line manager of the reporting member of staff is responsible for sharing the learning with their teams, following discussion with the reporting member of staff as this may be sensitive, but noting learning also includes sharing the positives and giving the wider team reassurance about the value of their role.

Consideration should also be given as to whether the learning needs to be shared wider if there is significant learning e.g. several teams, departments, etc. If so, then the Operations Manager should also feedback to the Security Team who will support the manager who led on the concern to collate and coordinate the wider sharing of any key learning points, including for ACS audits.

8 CONFIDENTIALITY

Records of all concerns must be kept as mentioned above. Refer to security procedures for further information about recording of information. Likewise, for confidentiality which needs to be maintained in line with current procedures, including GDPR compliance and ACS data integrity standards. The wishes of the person who is being harmed or at risk of being harmed must also be taken into consideration (again as set out in procedures).

9 SUPPORT FOR STAFF



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Managers must ensure that support is given to staff who feel affected by any involvement. Confidentiality will be maintained at all times and, where possible, identities will be protected, in accordance with ACS staff welfare requirements.

However, there may be circumstances where the identity of individual employee cannot remain confidential. For example, where a staff member witnesses an assault/harm and will be required to provide a witness statement and possibly attend court. In such instances, additional support will be given to that person by the Organisation (or from their own organisation in the case of external partners/subcontractors, including both practical and emotional support, both during the course of their duties and if involved in matters outside of their role e.g. giving statements, attending court or inquests etc. Managers should contact HR Team and or Security Team for advice and guidance about supporting members of staff.

It is important to remember, however, that such instances are thankfully rare and that the safety of employees is also paramount.

10 TRAINING

All managers will receive training on this procedure as part of wider security and safeguarding awareness training. It will be the responsibility of each Manager to ensure their teams have an understanding of this procedure. New starters will receive training as part of their induction, including SIA licensing requirements where applicable. This includes office-based staff that may not normally come into direct contact with clients but still have a role to play about spotting possible concerns. Training meets ACS standards for competency and ongoing development.

CAPITAL SHIELD SECURITY LTD will also aim to ensure that external subcontractors who are formally procured to provide services to us, follow these procedures or have similar procedures in place. Likewise, external partners working with CAPITAL SHIELD SECURITY LTD e.g. event organisers, venue managers etc. More broadly, that all those working for and with CAPITAL SHIELD SECURITY LTD have an understanding and commitment to playing their part in helping to keep sites and individuals as safe as possible, in compliance with SIA regulations.

Cause for concern flowchart for CAPITAL SHIELD SECURITY LTD

Member of staff, someone working with us, another individual etc has a concern. This concern should be communicated where it is safe to do so.