Proxy Working Policy

PRN-106: Proxy Working Policy
Company Name: AI Auto-Tech Ltd
Trading/Business Name: CAREHOPES
Company Registration Number: 15556946
SIC Code: 88100 – Social Work Activities Without Accommodation for the Elderly and Disabled
Email: admin@carehopes.com
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1. Policy Introduction

CAREHOPES, the trading name of AI Auto-Tech Ltd, enforces a strict **Proxy Working Principle** to protect service users, staff, external professionals, and the organisation from misrepresentation, fraud, boundary breaches, and safeguarding risks.

Proxy working includes **any situation where a companion allows another person to act on their behalf**, whether:

- A friend
- A known professional
- A family member
- Another TC staff member
- Any third party

This includes **unauthorised shift swapping**, **delegating duties**, or **sending someone else to fulfil your shift** without TC approval.

This policy ensures clarity, safety, and accountability in all companionship services.

2. Key Principles

- **Zero tolerance:** Proxy working is strictly prohibited.
- **Safety:** Prevents safeguarding risks caused by unclear identity or role substitution.
- **Integrity:** Companions must represent themselves honestly at all times.
- **Accountability:** TC must know exactly who is providing companionship.
- **Transparency:** All shift changes must be disclosed and approved.

- **Compliance:** Unauthorised swapping is misrepresentation and may constitute fraud.

3. Policy Statement

CAREHOPES ensures that companions:

- Perform their duties personally
- Do not delegate or send substitutes
- Do not allow anyone to act on their behalf
- Do not swap shifts without TC approval
- Report emergencies requiring shift cover
- Document proxy-working attempts
- Escalate concerns immediately to management

Companions must **not**:

- Ask friends or known professionals to cover their shift
- Allow another staff member to cover without TC approval
- Misrepresent who is providing companionship
- Swap shifts privately
- Perform tasks outside companionship scope
- Follow external instructions that conflict with TC policy

4. Purpose

- Prevent misrepresentation and fraudulent activity
- Protect service users from unknown individuals
- Ensure TC knows who is present for safeguarding and monitoring
- Maintain professional boundaries
- Strengthen organisational accountability
- Prevent criminal liability arising from unauthorised substitution

5. Scope

This policy applies to:

- Employees

- Volunteers
- Contractors
- Agency workers
- Zero-contract workers (**PRN-149**)

It covers proxy-working risks in:

- Private homes
- Community settings
- Public spaces
- Digital environments
- Multi-staff working
- Group companionship
- Emergency shift cover
- Staff-to-staff shift swapping

6. Related Policies

Safeguarding & Protection

PRN-003 Adult Safeguarding Policy PRN-136 Safeguarding Children Policy PRN-144 Child Abuse Policy PRN-150 Working with Vulnerable Children Policy PRN-143 Working with Vulnerable Adults Policy PRN-116 Domestic Abuse Policy PRN-131 Prevent Duty Awareness Policy PRN-129 Modern Slavery and Human Trafficking Policy PRN-070 Safeguarding Reporting and Escalation Procedure

Operational Delivery

PRN-145 Working in Pairs and Multi-Staff Working Policy PRN-146 Working with Other Social Workers and Carers Policy PRN-109 Companionship Standards Policy PRN-017 Companion Charter PRN-018 Companion Completion Checklist

Conduct, Ethics & Behaviour

PRN-014 Code of Conduct Policy PRN-015 Code of Ethics PRN-099 Professional Boundaries Policy PRN-004 Anti Harassment & Anti Discrimination Policy PRN-139 Staff Conduct and Behaviour Policy

7. Definitions

Proxy Working: Allowing another person to act on your behalf, perform your duties, or represent you without TC approval.

Misrepresentation: Presenting someone else as the assigned companion or failing to disclose a shift replacement.

Unauthorised Shift Swapping: Any shift cover arranged privately without TC approval.

Fraudulent Substitution: Knowingly allowing someone else to attend a shift under your name.

8. Core Proxy Working Rules (Mandatory)

8.1 No Delegation of Duties

Companions must **never**:

- Send a friend
- Send a known professional
- Send a family member
- Ask another staff member to cover without approval
- Allow anyone else to represent them

8.2 No Unauthorised Shift Swapping

If a companion cannot attend their shift due to:

- Emergency
- Illness
- Unforeseen circumstances
- Personal commitments
- Being busy

They must:

- Notify the on-call manager or TC management immediately
- Disclose the staff member willing to cover
- Wait for TC approval
- Allow TC to reassign the shift formally

TC must approve all shift swaps.

8.3 Mandatory Disclosure

If another staff member agrees to cover a shift:

- The original staff member must disclose it

- The covering staff member must disclose it
- TC must update the system
- TC must confirm the identity of the attending companion

This ensures:

- Accurate monitoring
- Correct reporting
- Proper safeguarding oversight

8.4 Misrepresentation and Fraud

If a staff member swaps shifts without TC approval:

- It is misrepresentation
- It is a breach of safeguarding
- It is a breach of professional boundaries
- It is gross misconduct
- It may constitute fraud
- It may be treated as a criminal act

TC reserves the right to:

- Suspend the staff member
- Terminate employment
- Report the incident to safeguarding authorities
- Report the incident to law enforcement if required

8.5 Legal and Safeguarding Justification for TC-Only Shift Allocation (New Expanded Section)

CAREHOPES is the **only authority** permitted to allocate, reallocate, or approve shift swaps because TC alone holds **full staff profiles**, including:

- DBS status
- Right-to-work documentation
- Legal eligibility to work with children or adults
- Gender-based safeguarding restrictions
- Allocation restrictions for specific service users

- Disciplinary history
- Ongoing investigations
- Risk flags
- Professional limitations
- Training compliance

External individuals and even other TC staff **do not have access** to this information and therefore **cannot safely determine** whether they are legally or professionally permitted to work with a particular service user.

Some staff may be:

- **Legally restricted** from working with children
- **Restricted** from working with certain adults
- **Prohibited** from working with specific service users
- **Under investigation**
- **Suspended**
- **Awaiting DBS clearance**
- **Not trained** for certain risk categories
- **Not authorised** for multi-staff or high-risk environments

If a staff member privately swaps a shift with someone who is **not legally permitted** or **not authorised** to work with that service user, it creates:

- A **serious safeguarding breach**
- A **misrepresentation of identity**
- A **risk of harm to the service user**
- A **risk of criminal liability**
- A **risk of regulatory violation**
- A **risk of insurance invalidation**

Therefore:

Only TC management may approve shift swaps, reallocations, or emergency cover.

Any shift swap that occurs **without TC approval** is:

- **Misrepresentation**

- **Gross misconduct**
- **Fraudulent activity**
- Potentially a **criminal act**

This rule protects:

- Service users
- Staff
- External professionals
- TC's legal compliance
- Safeguarding integrity
- Insurance validity

9. Avoiding Duplication of Services

If external professionals are already providing a service:

- Companions must skip that service
- Document: *"Service already being provided by other service: {name of service}."*
- Avoid duplication
- Avoid conflict
- Avoid boundary confusion

Companions must **not**:

- Debate roles
- Negotiate responsibilities
- Initiate discussions with external professionals

All clarifications must be handled by TC management.

10. Safeguarding Considerations

Proxy working creates serious safeguarding risks:

- Unknown individuals entering homes
- Lack of identity verification
- Inability to track who is present
- Increased risk of abuse or exploitation

- Loss of accountability
- Confusion during emergencies

Companions must:

- Report proxy-working attempts immediately
- Document concerns
- Follow safeguarding escalation procedures

11. Documentation & Record Keeping

Records must include:

- Proxy-working attempts
- Unforeseen circumstances requiring shift cover
- Staff disclosures
- TC approvals
- “Service already being provided” entries
- Safeguarding concerns
- Actions taken

Records must be factual, objective, and stored securely.

12. Training Requirements

Staff must receive training in:

- Proxy working principles
- Professional boundaries
- Safeguarding
- Multi-agency collaboration
- Communication and conflict avoidance
- Fraud prevention
- GDPR and confidentiality

13. Policy Review

This policy will be reviewed annually or sooner if required due to:

- Legislative changes

- Safeguarding updates
- Organisational changes
- Incident trends