

Adult Support and Protection Policy

Approved by Wheatley Group Board April 2017
Updated April 2019

Record of Amendments

Date Approved by Wheatley Group Board and Designated as a Group Policy	26 th April 2017
Date Amended	1 st April 2019
Amendments	
Revised wording to reflect creation of Wheatley 360 and revise roles	Section 6
Revised to include GDPR	Section 8
Revised to include GDPR	Section 12

Contents

1. Introduction
2. What is Adult Support and Protection?
3. Policy Aims and Objectives
4. Our Role
5. Reporting Concerns
6. Designing and Delivering Services
7. How we will Know we are Making a Positive Impact on our Customers Lives and in our Communities
8. Legislation and Strategic Drivers
9. Policy Review and Consultation
10. Support, Procedures, Awareness and Training
11. Performance Monitoring and Reporting
12. Confidentiality and Data Protection
13. Engagement and Communication
14. Complaints

1. Introduction

The Wheatley Group's (The Group) Adult Support and Protection Policy is part of a suite of policies within our Group Protecting People Policy Framework (PPPF). The PPPF is our group wide approach to keeping our communities safe and provides us with a strong platform for sharing learning and best practice across all subsidiaries. The other policies within the framework are:

- Child Protection;
- Multi Agency Public Protection Arrangements (MAPPA); and
- Domestic Abuse.

The strategic aim of all policies within our PPPF is to ensure that: *we work with customers, staff and partners to make homes and lives better and safer for all and that we design and deliver services to minimise the risk of harm and abuse within our communities.*

Our ability to work with our communities to prevent and respond appropriately to their priorities will be key to achieving our Investing in our Futures (IioF) vision of cementing our reputation as one of the UK's leading customer focused organisations.

Our customers have told us that feeling safe and secure in their home and community is extremely important to them and this, in turn, impacts on local demand and community stability. Our PPPF, and the suite of policies within it, support our customers' priority of feeling safe and defines our role in achieving that outcome.

The protection of adults at risk of harm is not an option but a responsibility across all agencies. The expectation for all "at risk" adults in our communities is that they are empowered, through support from all public services including Social Services, Police Scotland, Health, Housing and Care Organisations to be free from preventable harm or exploitation. They are enabled to make their own choices about their lives and to live as independently as their personal circumstances may permit.

Many of our most vulnerable customers are affected by additional factors that affect their wellbeing and quality of life, these include: welfare reforms; physical and mental health; feelings of isolation. Through our customer insight, we know the value our customers place on additional wraparound supports that we can provide.

This policy provides information to customers, staff and partners in relation to how we will work together to support and protect people in our communities. It details our response to adults who are defined as adults at risk under the Adult Support and Protection (Scotland) Act 2007, as we firmly believe that we should do all we can to ensure our communities are safe and protected from harm. All staff within the Group will report suspicions or disclosures made about any adult at risk of harm.

In addition to our response to adults at risk, it also provides information on the wider wraparound support services that we have in place to assist our most vulnerable customers who may require some additional support.

Through the development, implementation and monitoring of our Adult Support and Protection Policy, along with our other policies within the PPPF, we will define what it really means to keep our communities safe and set sector leading standards in Group Protection service areas.

2. What is Adult Support and Protection?

The Adult Support and Protection (Scotland) Act 2007 (The 2007 Act) was developed to protect and benefit adults at risk of being harmed. The 2007 Act requires councils and a range of public bodies to work together to support and protect adults who are unable to safeguard themselves, their property and their rights. The 2007 Act clearly defines an adult at risk. Key definitions within The 2007 Act are noted below:

2.1 Definition of an Adult

For the purpose of The 2007 Act an “adult” is an individual 16 or over.

(For those aged 16-18 years and subject to child care legislation, consideration should be given to the best way of managing the risk of harm and what would best meet the needs of the adult.)

2.2 Who is an Adult at Risk of Harm?

Under The 2007 Act, an adult at risk of harm is any individual aged 16 or over who:

- Is unable to safeguard their own wellbeing, property, rights or other interests;
- Is at risk of harm; and
- Because they are affected by disability, mental disorder, illness, physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.

All of the above risk criteria must apply to identify an individual as an “adult at risk”.

The presence of a particular condition does not automatically mean an adult is an “adult at risk”. Someone could have a disability but safeguard their own wellbeing, property, rights or other interests; all three elements of this definition must be met. It is the entirety of an adult’s particular circumstances which combine to make them more vulnerable to harm than others.

2.3 What is Risk of Harm?

Section 3(2) of The 2007 Act makes clear that an adult is at risk of harm if:

- another person’s conduct is causing (or is likely to cause) the adult to be harmed; or
- the adult is engaging (or is likely to engage) in conduct which cause (or is likely to cause) self-harm.

2.4 What is Harm?

Section 53 of The 2007 Act states that harm includes all harmful conduct and in particular includes:

- Conduct which causes physical harm;
- Conduct which causes psychological harm (eg causing fear, alarm, or distress);

- Unlawful conduct which appropriates or adversely affects property, rights, or interests (eg theft, fraud, embezzlement or extortion);
- Conduct which causes self harm.

The harm can be accidental or intentional, as a result of self-neglect or neglect by a carer, or caused by self harm and/or attempted suicide.

2.5 Types of Harm or Abuse

The definition of “harm” in The 2007 Act sets out the main broad categories of harm that are included. The list in the definition (at section 2.4) is not exhaustive and no category of harm is excluded simply because it is not explicitly listed. Domestic abuse, gender based violence, forced marriage, human trafficking, stalking, hate crime and ‘mate crime’ are further examples of what can also generally be considered harm.

Harm can be a single or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust, which causes harm or distress to an adult. It can occur in any setting: when an adult lives alone or with a relative; within a nursing, residential; supported living or day care setting; hospitals; custodial situations; supported services in people’s own homes; any other place previously assumed safe; or in public places.

On some occasions the perpetrator of harm might be at risk of harm themselves; such as one of our tenants or someone who our care subsidiaries provide a service to, who regularly becomes inebriated and puts others at risk or staff into a state of fear.

Multiple forms of harm or abuse may occur in an ongoing relationship or service setting or to more than one person at a time. It is important therefore to look not only at a single incident, but to also consider the underlying dynamics and patterns of harm.

We also recognise that the type of accommodation someone lives in can also increase the possibility of harm occurring, for example, someone residing in an upper floor of a multi storey property, when they have displayed suicidal behaviours, could be at increased risk of self harm. It is extremely important in those situations that we work with the customer and partner agencies to mitigate as far as possible the risk of self harm.

Below are some examples of the type’s harm that staff may come across or have disclosed to them. It is not exhaustive and should only be used as a guide.

Physical harm or abuse involving actual or attempted injury to an adult defined as at risk. For example:

- Slapping, pushing, hitting, kicking;
- Misuse of medication;
- Pinching, biting, shaking;
- Forcible feeding;
- Improper use of medication;
- Restraining or holding an individual back – locking in a room, tying to a bed or chair;

- Inappropriate touching; and
- Being threatened with a weapon.

Sexual harm or abuse involving activity of a sexual nature where the adult at risk cannot or does not give consent. For example:

- Inappropriate sexual contact, touching kissing;
- Sexual assault, rape, non-consensual contact, sexualised conversation / comments;
- Indecent Exposure;
- Being made to listen to or watch pornography without consent; and
- Voyeurism.

Psychological and Emotional harm or abuse resulting in mental distress to the adult at risk. For example:

- Threats, manipulation, inappropriate treatment;
- Humiliation, overt control and dominance;
- Isolation and abandonment;
- Bullying and intimidation by word or act;
- Access to a person being denied;
- Misuse of power or influence;
- Threats of harm or abandonment;
- Putting down, ignoring someone;
- Controlling behaviour;
- Taking away privacy; and
- Constant criticism.

Financial or Material harm or abuse involving the exploitation of resources and property belonging to the adult at risk. For example:

- Theft or fraud;
- Misuse of money, property or resources without the informed consent of the adult at risk; and
- No control over household finances, with the adult at risk being given an allowance at the perpetrators discretion.

Verbal harm or abuse involving use of language to cause distress to the adult at risk. For example:

- Inappropriate use of language, disrespect, name calling, shouting, sarcasm, inappropriate use of humour, using language to confuse or exclude.

Institutional harm or abuse involves the adult at risk having their individuality ignored. For example:

- Removal of individuality within an institution by strict inflexible regimes and routines, lack of accommodation to individual choice, lifestyle etc.

Discriminatory harm or abuse can affect the adult at risk in several ways. For example:

- Racist, homophobic, ageist, sexist behaviours, harassment and any other discriminatory acts, e.g. transphobia;
- Preventing someone from accessing appropriate sexual support/education;
- Denying someone the right to exercise their religion or belief;
- Forcing an individual to participate in a religious or belief practice;
- Denying someone access to culturally appropriate meals; and
- Inappropriate “nicknames”.

Neglect and acts of omission by others charged with the care of the adult, including ignoring medical or physical care needs. For example:

- Inadequate heating or nutrition, isolation and abandonment, withholding key essentials, denying access to social or educational services;
- Person alone and at risk;
- Failure to give privacy and dignity;
- Failure to take an adult at risk to medical appointments or to correctly administer medicines;
- Neglect of accommodation, self neglect; and
- Not re-setting a night alarm or buzzer.

Self harm where the adult at risk carries out acts to cause injury or distress. For example:

- refusal to eat or drink;
- Drug/alcohol misuse;
- Cutting, burning, scalding or hitting parts of own body;
- Calculated and dangerous risk taking;
- Banging head or other parts of the body;
- Swallowing harmful substances;
- Attempts or makes threats of suicide; and
- Overdosing.

2.6 Possible Signs of Harm

There are many signs of harm. Our staff are well placed to be alert to signs of harm, with our local teams in operational subsidiaries focused on face to face interactions with our customers, often taking place in our customers’ homes.

In identifying signs of harm, it is important to consider any changes to the wellbeing of a person at risk. Our unique WE Care model is a personalised approach responsive to our customers’ needs and greatly assists us in not only identifying signs of harm but also allows all parts of the Group to draw down quality support for our customers as and when required. Often when we believe a customer is an adult at risk, any referral to statutory agencies will be accompanied by a referral to our Loretto Care Tenancy Support Service.

Some examples of signs of harm are:

- Unexplained or unusual injuries;
- Misuse of medication eg not giving medication properly;

- Unexplained changes of behaviour eg becoming anxious and withdrawn, fear of another person;
- Unexplained debt, not paying bills for services or accrual of rent arrears;
- The use by another person of the adult's possessions, bank account or property with his or her informed consent;
- Pressure by family or professionals to have someone moved into or taken out of care;
- Hostile or unkind behaviour by a care-giver (paid or unpaid);
- The adult at risk is not receiving appropriate care, which would protect them from harm;
- Unexplained deterioration in health or appearance;
- A long delay between illness or injury and the person getting appropriate treatment;
- The deprivation of basic needs, such as adequate food or heating;
- Prejudicial actions or remarks to the adult at risk about age, gender, disability, race, colour, sexual or religious orientation;
- Failure to provide adequate information, not being informed of their rights or being misinformed; and / or
- Repeatedly being victimised in incidents of antisocial behaviour.

The above list is not exhaustive and should be used as a guide only.

3. Policy Aims and Objectives

3.1 Our Aim

We will work with customers, staff and partners to make homes and lives better and safer for all. We will design and deliver services to minimise the risk of harm and abuse within our communities.

3.2 Our Objectives

We will achieve our aim and strategic vision by successfully implementing the following objectives across all subsidiaries:

- We will ensure our policies are **fit for purpose** and promote wider adult support and protection activity at both a local and national level;
- We will work in **partnership** with those agencies who have a duty to investigate adult support and protection and proactively work to develop those relationships;
- We will embed a culture of **early intervention**. For example, our Housing Officers have intimate knowledge of our communities and are therefore in a unique position to be alert to early indications of violence, abuse or any other concerns within a household;
- Through our Investing in our Futures Strategy we will continue to inspire and empower our staff to develop **innovative solutions** to support our individual customer's needs;
- We will **raise awareness** of adult support and protection and ensure everyone who is employed or involved in our organisation is aware of this. Leaders within the organisation will support and promote this;

- Through our groundbreaking **W.E. Care** approach we will ensure we are in a unique position to access support for all customers, not just the needs of those in traditional care groups; and
- Our approach will strike the balance of being sufficiently **flexible** to ensure we have our customer's wellbeing at the heart of our processes, working with them to deliver a range of personalised services to support and protect them from harm, while ensuring we have a level of consistency in our approach.

4. Our Role

Our role in adult support and protection, as a leading housing and care organisation, is predominantly awareness and identification, followed by, where appropriate, reporting our concern to the relevant Local Authority Social Work Department and, if required, Police Scotland. This is discussed in more detail in section 5.

4.1 Awareness, Identification and Response to Adults at Risk of Harm

We may become aware of adults at risk from a number of sources, these include:

- Disclosure by the customer;
- Disclosure by a third party;
- Identification by a member of staff; or
- Identification through customer insight from ASTRA (our Group CRM).

Regardless of how we become aware of the adult at risk we will obtain as much information as possible (if it is safe to do so) in order to inform our response and take any necessary action.

Anyone who approaches us and discloses they are being harmed can expect the following response:

- Our starting point will be that we will believe them;
- A disclosure alone is sufficient for the adult at risk to be given advice and assistance as a matter of priority for staff;
- We will offer suitable interview provisions including accessible venue, same sex interviews and translation service if necessary;
- We will ensure that anyone experiencing abuse is treated in a sympathetic, supportive and non-judgemental way; and
- We will reassure the person that while reports are confidential, there are circumstances where information must be passed to the relevant authorities eg Social Work or Police Scotland.

4.2 Awareness, Identification and Response to Adults at Risk of Self Harm (including Suicide)

We know that a number of our customers in our communities are at risk of self harm and in particular, suicide.

Someone may be at risk of suicide if they appear: stressed, anxious or depressed; don't seem to be coping with any problems they may have; are distracted, moody or withdrawn; show marked changes in their eating, sleeping or drinking habits. Our staff are in regular contact with our customers in their homes, and are in a unique

position to be alert to these signs. If we have any concerns that someone is having suicidal thoughts, we will:

- Take all signs of distress seriously, even if the person seems to be living a normal life;
- Ask the person about what's troubling them;
- Listen carefully to what they have to say; and
- Let them know we care and are here to help through support and referral to specialist agencies.

In cases where there is an immediate threat or risk of harm to the customer or others we will contact the relevant services ie Police Scotland, NHS 24 or Scottish Ambulance Service.

During the life of this policy we will access appropriate training opportunities for staff to equip them with the skills to feel competent at responding to concerns where customers may be suicidal.

5. Reporting Concerns

We recognise that whilst Local Authorities have the lead role in adult protection, effective intervention will only come about as a result of productive cooperation and communication between a range of agencies and professionals. What one person or public body may know, may only be part of a wider picture. Good practice dictates that all relevant stakeholders should cooperate with inquiries and investigations.

As soon as we are alert to possible abuse within a household it is extremely important that our response is appropriate. Where we have concerns that an adult is potentially an adult at risk, as defined in the 2007 Act, using supporting procedures and guidance, we will make an assessment whether to report our concerns to the appropriate Local Authority using standardised templates. If it is believed a crime has been committed we will also report our concerns to Police Scotland either via 101 or 999, depending on the circumstances.

If we are passing on concerns reported to us by a third party (eg neighbour) or disclosures by the victim, it is good practice to advise the person making the disclosure that concerns are being reported, but that may not always be possible. If staff are in any doubt they should discuss this with their line manager or the Group Protection Liaison Manager.

Within Wheatley we have our unique Community Information Reports which allow us to share information / intelligence with Police Scotland. While this is actively encouraged, it should not be used as a substitute for calling Police Scotland where there is a threat or risk of harm to our customers. When there is a threat or risk of harm this must always be reported to Police Scotland by calling 101 or 999 depending on the circumstances.

Care Inspectorate Notifications

Our care subsidiaries will also report any adult support and protection issues involving someone who uses their services to the Care inspectorate via the E-Forms System.

6. Designing and Delivering Services

In addition to our response to cases where an adult meets the definition of an adult at risk, as described in The 2007 Act, we will also continue to design and deliver services that support the wellbeing and safety of our most vulnerable customers (some of whom may also be considered an adult at risk as defined in The 2007 Act).

lioF demonstrates our continued focus on providing excellent homes, services and products and the benefits of coming together as Wheatley to learn from our joint experience and expertise to implement our shared learning.

Some of the ways in which we will support our most vulnerable customers are detailed below:

6.1 Group Protection Liaison Manager

Within The Group we have a dedicated officer (Group Protection Liaison Manager) who forms part of Wheatley 360: our wraparound support division.

The Group Protection Liaison Manager has a dual focus of driving forward the strategic outcomes contained in lioF, creating the best solutions for all customers in relation to adult support and protection. In addition to the strategic focus, there is also an operational focus responding to any concerns staff have for our customers who may be at risk of harm.

6.2 Personalised Customer Service Outcomes

Our vision for 2020 is to deliver outstanding personalised customer service – putting our customers in control of how they engage with us by offering a unique service mix. Our vision supports the principles of The 2007 Act, which places importance on the adult participating as fully as possible and their wishes being taken into account in all interventions under The 2007 Act.

In order to deliver excellent services for our customers we need to understand who our customers are and what services they need and want. We have developed a number of customer insight tools to enable us to fully understand our customers and our communities, this includes:

- Our unique Community Improvement Partnership intelligence, which analyses data from Police Scotland, Scottish Fire and Rescue, and our in house Antisocial Behaviour Database enabling trend analysis of issues affecting our communities;
- ASTRA (our Group CRM) where all information relating to customer contacts is held in one place (repairs, housing options, rent). The insight gained from ASTRA allows us to deliver real value to individual customers by targeting and tailoring services focussed on their particular needs; and
- Customer Conversations are our individual contacts with each customer on a regular basis.

This layered analysis of insight from a range of sources allows us to fully understand who our customers are and the issues affecting them. We are in a unique position as

a landlord to be alert to abuse within households, for example, sudden unexplained rent arrears; repeated reports of antisocial behaviour; discussions through our housing options and solutions model, could all provide indications that an adult is potentially being harmed.

In cases where we believe customers are adults at risk, as defined in The 2007 Act, we will always seek to make referrals to the statutory agencies subject to conducting an appropriate assessment on whether to report our concerns. We will also compliment and support this action through designing personalised customer service outcomes with an appropriately differentiated range of products that can be delivered to meet the needs of our most vulnerable customers

By engaging with our customers to help them feel more in control of how and when they access support and improving access to information they need to make better decisions, we will improve their perception of value. We know that helping people feel more in control contributes to improving resilience, health and wellbeing outcomes.

We will build staff skills around adult support and protection so that our customer facing staff will be empowered to deliver personally tailored holistic packages of services to our most vulnerable customers. Every interaction with a customer who is considered an adult at risk should feel personal and should capture individual priorities for that customer, as we know there is no such thing as a universal customer.

6.3 W.E. Care

Our unique W.E. Care model delivers a personalised service for all customers. The model focuses on maintaining and maximising well-being, safety and or self-reliance, by supporting people through life transitions, and building lasting relationships.

We will draw down on this support as and when required to support our customers who are at risk of harm.

The inbuilt flexibility in our W.E. Care model allows us to recognise and respond effectively to the challenges people at risk of harm face. This approach will ensure self-reliance and control that can be facilitated and maintained when it is right for the individual; safe in the knowledge that re-engagement can easily be facilitated at any time

Our specialist teams within Loretto Care and Barony are fully trained in adult support and protection. We will use their expertise to up skill staff across all areas of the Group in adult support and protection.

6.4 Smart and Assistive Technology

Our W.E. Care model provides a continuum of support to our customers as they experience the challenges of life transitions. A key area where we are developing our responses over the lifetime of lioF is the use of smart and assistive technology to support us in managing the risk for our most vulnerable customers in an affordable and effective way. Examples could include door alarms that 'speak' to people in a voice they recognise if they open the main door at inappropriate times during the day or night or motion sensing lights.

Development of our smart and assistive technology will be driven by both our W.E. Care model and our review of our Community Improvement Partnership which will create bespoke roles focusing on improving the safety of our most vulnerable customers.

6.5 Housing Options and Solutions

We recognise that there are situations where it may not be safe for adults at risk to remain in their current accommodation (eg the perpetrator resides in the same household). In those situations we will work with all relevant partners to utilise our housing options model, in order to find the most appropriate and safe solution for that customer.

(In situations where the adult is at risk of harm from a neighbour it may also be appropriate to refer to our Antisocial Behaviour Policy Framework).

6.6 Foundation Officers

Our Foundation Officers within the Wheatley Foundation develop innovative solutions, finding creative ways to support our customers and their communities. Some of the initiatives they have supported or that are in development include:

- The Coming Home Project – working with former armed forces personnel, providing support and referrals to specialist treatment and work placements;
- G43 Project – working with vulnerable adults on a range of projects including gardening, arts and craft; and
- Potentially developing a Community Room in one of our multi storey blocks in the north east of Glasgow to provide support networks for those with addiction issues;

The benefit of being part of the Group has now facilitated new inter subsidiary collaborations being developed between the Foundation and other part of Group.

6.7 Wraparound Support

Our ambition in IioF is that we transform our services so that we exceed customer expectation in everything that we do. We will continue to offer practical support to our most vulnerable customers. Some of the wraparound support services we can draw down are noted below:

Home Comforts is our furniture and white goods re-distribution service for new or existing customers who need help to furnish their homes. Furniture which is found in empty homes or is donated by staff or customers is up-cycled before being delivered to customers who need it. The furniture is stored and up-cycled in our workshop and can be delivered to any of our RSL customers.

Eat Well is a support we offer to customers experiencing severe hardship. We have a partnership with Fareshare that gives us direct access to free, in-date surplus supermarket food. We then re-distribute this food to our customers while other wrap around services identify and tackle the root of the main problem.

Welfare Benefits Advisors are our in house officers who advise customers what benefits they are entitled to and work to maximise their income through applications for relevant welfare benefits and any other grants or charitable funds they may be entitled to. They advocate for customers in all disputes with regards to benefits and income and also attend tribunal hearings to advocate on their behalf. Advisers often refer customers to other agencies if they need support with mental health, addiction issues, fuel debt, money advice and food poverty.

Fuel Advisors support customers to get the best value for money for their electricity and gas bills. The team of advisers visit new tenants in their homes, help them register with a supplier and show them how to get the best use of their systems, particularly if they have vulnerabilities which would make this difficult for them to do so themselves. They also visit existing tenants to advise them how to cut the price of their bills and ensure they are on the most affordable tariff. Advisers negotiate with energy companies to reduce customers' bills and monthly payments if they are struggling to pay and can assist customers to apply to have any debts written off or request any rebates they may be entitled to. They also make applications for warm home discounts and to the Energy Saving Trust for fuel debts.

Loretto Care Tenancy Support Service is designed to provide short-term, low-level support to help customers who are vulnerable, at risk, or in crisis to develop the skills they need to make a success of their tenancy. It is designed with the customer, working with them to identify and achieve their outcomes. Support is provided in the customer's home, usually for an average of eight weeks. Support can range from practical support with budgeting to supporting people to build support circles.

Changing Lives Employability Programme supports customers back into employment by providing training and work experience opportunities for some of our most disadvantaged customers. The Changing Lives programme provides a mix of environmental apprenticeships and employability programme opportunities, both of which last for a two-year period.

7. How we will Know we are Making a Positive Impact on our Customers Lives and in our Communities

We will know we are making a positive impact on our customers' lives and our communities when:

- Our communities are safer places for all with our most vulnerable adults being protected from harm;
- Our staff are confident in dealing with all aspects of adult support and protection, being alert to signs of harm and knowing when to make referrals to Social Work and / or call Police Scotland;
- We have appropriate pathways and referral systems in place to ensure customers are getting the right support at the right time, first time, through our unique range of wrap around supports; and
- We are realising the vision and outcomes contained within our Investing in our Futures Strategy.

8. Legislation and Strategic Drivers

This policy framework has been developed taking into account the legislation and guidance relevant to areas of protection:

- Adults with Incapacity (Scotland) Act 2000;
- Mental Health (Care and Treatment) Scotland Act 2003;
- Adult Support and Protection (Scotland) Act 2007;
- Protection of Vulnerable Groups (Scotland) Act 2007;

This policy also takes account of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

9. Policy Review & Consultation

We will review this policy every three years. Reviews will consider legislative, performance and good practice changes.

More regular reviews may be considered where, for example, there is a need to respond to new legislation / policy guidance or any recommendations from significant case reviews.

We have developed this policy in consultation with key stakeholders. Similar consultation will take place for all proposed policy reviews.

10. Support, Procedures, Awareness and Training

All staff will be made aware of the existence of this policy, their responsibilities and the benefits of delivering this policy, to enable us to protect the most vulnerable people in our communities.

Training needs of staff across the organisation will be informed by insight from My Contribution (The Group's skills analysis and employee performance review tool).

Where skills gaps are identified, training by both external partners and key internal personnel will be provided for adult support and protection and wider Group Protection issues throughout our network of Academies.

Regular blogs will be added to Wheatley Group Intranet Systems to ensure staff awareness levels are maintained.

Staff will be supported by our W.E. Solutions Support Services and supplied with clear written pathways, a quick reference guide and a detailed toolkit on how and where to report concerns.

Clear leadership and accountability mechanisms will be established, these will be complemented with robust governance arrangements.

11. Performance, Monitoring and Reporting

During the first year of this policy we will establish our baseline and from there develop a Trend Analysis Framework in Adult Support and Protection.

We will use the Trend Analysis Framework to inform our future allocation of resources.

12. Confidentiality and Data Protection

Those employed or involved in our subsidiaries have a responsibility to act to make sure that a child, young person or adult whose safety or welfare may be at risk is protected from harm.

In certain circumstances (and subject strictly to conditions set out in the Data Protection Act 2018, General Data Protection Regulations and any other applicable data protection legislation) personal information may be shared by the Group with other organisations and partners. Before the Group can share personal information it must consider all of the legal implications of doing so, not simply the terms of applicable legislative requirements. Appendix 3 of Wheatley Group Data Protection Policy must be considered.

Once a decision has been made as to whether or not information should be shared, that decision must be recorded, together with the reasoning behind that decision. Where a decision was taken to share the information, this will be on a “need to know” basis and an audit trail must be kept.

Staff members must consult the Wheatley Group Data Protection Policy and if in doubt will seek advice from the Group Information Governance Team.

13. Engagement and Communication

Within the Wheatley Group we have Communities of Excellence (CoE) which consist of various members of staff from across the Group. Our CoE networks are at the heart of our Group wide ecosystem of innovation, generating learning ideas from across Group and learning from other sectors.

One of the key ways we will engage and communicate with staff in relation to the Group Protecting People Policy Framework is through the Protecting Communities CoE. Through the CoE we will develop effective feedback loops between frontline staff and senior management. This will be the main channel for open and effective communication on the implementation of the Group Protecting

People Policy Framework. Any blockages hindering the delivery of this policy framework will also be addressed through the CoE.

A key inter dependency of our Protecting Communities CoE is the Care Virtual Centre of Excellence being developed. It is envisaged that the Centre of Excellence will comprise of four CoE's that will have close linkages to our group wide approach to adult support and protection. We will ensure there are clear communication lines where there are links between the CoE's.

14. Complaints

Our aim is to get it right first time, however, where there is dissatisfaction with this policy or its operation, customers can make a complaint.

A summary of our Complaints Policy and Procedure is available on our website and in local offices.