

Child Protection Policy

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Record of Amendments

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Amendments	
Inclusion of child sexual exploitation as a form of sexual abuse	Section 2.3
Revised wording to reflect creation of Wheatley 360 and revised roles	Section 6
Revised to include GDPR	Section 8
Revised to include GDPR	Section 12

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1. Introduction

The Wheatley Group's (The Group) Child 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:

- Adult Support and 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.

We firmly believe that our customers are entitled to live their life without fear, harm or abuse, but we recognise that the number of children on the child protection register across Scotland, has increased by 34 per cent between 2000 and 2015 (from 2,050 to 2,751). It is therefore extremely important that where there are situations that children, young people or adults may be at risk of harm, we do all we can to minimise the risk.

This policy details the way in which we will assist and support partner agencies that have responsibility for investigating situations where children may be at risk of abuse or neglect. All staff within the Group will report suspicions or disclosures made about any child at risk.

In addition to our response to child protection, the policy details the wider service design and delivery being undertaken that promotes the wellbeing of children in our communities and supports the principles of Getting it Right For Every Child (GIRFEC). Children in many of our communities face additional challenges affecting their wellbeing and development in the current climate of welfare reforms. Notwithstanding that, it cannot be ignored that it has been well evidenced the positive impact that good quality housing and supports can have on physical and mental health, educational attainment and employment opportunities. Our response to, and investment in, supporting children and families in our communities is even more pivotal in the current climate.

Through the development, implementation and monitoring of our Child 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.

This Child Protection Policy provides information to customers, staff and partners in relation to how we will all work together to support and protect people in our communities.

2. What is Child Protection?

In order to protect the children in our communities we must be able to recognise the signs to look out for to enable us to identify when to be concerned. The sections below provide more detail on the definition of a child; what constitutes child protection; and signs to look out for.

2.1 A Child

A child can be defined differently in different legal contexts. For the purposes of this policy all reference to children and young people mean:

A person under 16 years of age, or a child between the age of 16 and 18 who is still subject to a supervision requirement by a Children's Hearing.

2.2 Child Protection

Child Protection means protecting a child from child abuse or neglect. Abuse or neglect need not have taken place; it is sufficient for a risk assessment to have identified a likelihood or risk of significant harm from abuse or neglect.

(National Guidance for
Child Protection in Scotland, 2014)

2.3 Child Abuse and Neglect

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting, or by failing to act, to prevent significant harm to the child. Children may be abused in a family or institutional setting, by those known to them, or more rarely, by a stranger. Assessments need to consider whether abuse has occurred or is likely to occur.

All children have a fundamental right to proper care and protection. Children may need protection when their basic needs such as food and warmth are neglected or they may need protection from harm from other people.

The definitions listed below show some of the ways in which abuse may be experienced by a child but they are not exhaustive, as the individual circumstances of abuse will vary from child to child. Possible signs of harm have been provided to accompany each definition: they should be considered a helpful guide but not used as a checklist.

It may be that the child or young person tells someone they are being abused, but show no obvious signs. It is crucial that if a child or young person says that they are being abused that the matter is taken seriously and the concerns are passed on as a matter of urgency.

Physical Abuse is the causing of physical harm to a child or young person. It may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or

suffocating. Physical harm may also be caused when a parent or carer feigns the symptoms of or deliberately causes, ill health to a child they are looking after.

Possible signs of physical abuse:

- Unexplained injuries or burns, particularly if they are recurrent
- Improbable excuses given to explain injuries;
- Refusal to discuss injuries;
- Untreated injuries or delay in reporting them;
- Excessive physical punishment;
- Arms and legs kept covered even in hot weather;
- Fear of returning home;
- Aggression towards others;
- Running away; and
- Administration of toxic substances

Emotional Abuse is the persistent emotional neglect or ill treatment that has severe and persistent adverse effects on a child's emotional development. It may involve conveying to a child that they are worthless or unloved, in adequate or valued only in so far as they meet the needs of another person. It may involve the imposition of age - or developmentally – inappropriate expectations on a child. It may involve causing the child to feel frightened or in danger, or exploiting or corrupting children. Some level of emotional abuse is present in all types of ill treatment of a child; it can also occur independently of other forms of abuse.

Possible signs of emotional abuse:

- Low self esteem;
- Continual self deprecation;
- Sudden speech disorder / refusal to speak;
- Fear of carers;
- Severe hostility / aggression towards other children;
- Significant decline in concentration span; and
- Self harm.

Sexual Abuse is any act that involves the child in any activity for the sexual gratification of another person, whether or not it is claimed that the child either consented or assented. Sexual abuse involves forcing or enticing the child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative and non-penetrative acts. They may include non-contact activities, such as involving the child in looking at, or in the production of indecent images or watching sexual activities, using sexual language towards a child or encouraging children to behave in sexually inappropriate ways.

Child Sexual Exploitation is a form of child sexual abuse in which a person(s), of any age takes advantage of a power imbalance to force or entice a child into engaging in sexual activity in return for something received by the child and / or those perpetrating or facilitating the abuse. As with other forms of child sexual abuse, the presence of perceived consent does not undermine the abusive nature of the act.

The key difference between child sexual exploitation and other forms of sexual abuse is there is some form of exchange: that is the child and / or someone else receive something in exchange for the sexual activity.

Possible signs of sexual abuse or child sexual exploitation:

- Sleep disturbances or nightmares;
- Complaints of genital itching or pain;
- Self harm;
- Eating disorders;
- Unexplained pregnancy;
- Acting in a sexually explicit manner;
- Anxiety / depression / withdrawn;
- Fear of undressing eg for physical exercise;
- Low self esteem;
- Inappropriate sexual awareness;
- Running away;
- Developmental regression; and
- Lack of trust in adults or over familiarity with adults.

Neglect is the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or care giver failing to provide adequate food, shelter and clothing, to protect a child from physical harm or danger, or to ensure access to appropriate medical care or treatment. It may also include, neglect of, or failure to respond to, a child's basic emotional needs. Neglect may also result in the child being diagnosed as suffering from "non-organic failure to thrive", where they have significantly failed to reach normal weight, growth or development milestones and where physical and genetic reasons have been eliminated. In its extreme form children can be at serious risks from the effects of malnutrition, lack of nurturing and stimulations. This can lead to serious long term effects such as greater susceptibility to serious childhood illnesses and reduction in potential stature. With young children in particular the consequences may be life threatening within a relatively short period of time.

Possible signs of neglect:

- Constant hunger or inappropriate / erratic eating patterns;
- Poor hygiene;
- Constant tiredness;
- Lack of adequate clothing;
- Failure to seek appropriate / necessary medical attention; and
- Unhygienic home conditions.

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 child protection activity at both a local and national level;
- We will work in **partnership** with those agencies who have a duty to investigate child 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 neglect, 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 child 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 child protection at the heart of our processes while ensuring a level of consistency in the implementation of this policy.

4. Our Role

Child protection is the responsibility of all who work with children and families, regardless of whether that work brings them into direct contact with children. Local Authority Social Work Departments and Police Scotland have a legal responsibility to investigate child protection concerns; they can only do this if they are made aware of those concerns.

As a leading Housing and Care Organisation, whilst we may not be directly involved in the investigation of suspected or reported abuse, we can play a key role in child protection. The successful introduction of our Group CRM (ASTRA) platform has transformed our service delivery and depth of customer insight. 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. Our staff have an intimate knowledge of our customers and are in a unique position to be alert to potential signs of children being at risk of neglect or abuse. They are in daily contact with our customers; this could be through our customer conversations, investigating incidents of antisocial behaviour or delivering our housing support and other wraparound support services. It is therefore important that our staff are aware of what they should do if they have concerns that a child may have been abused or neglected.

As soon as we are alert to possible child protection concerns within a household it is extremely important that our response is appropriate.

We may become aware of child protection concerns from a number of sources, these include:

- Disclosure by the parent or carer of a child;
- Disclosure by a third party;
- Identification by a member of staff; or
- Identification through customer insight from ASTRA

More rarely the child themselves may also disclose to staff information that indicates they are at risk of harm.

Regardless of how we become aware of the child protection concern 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.

If someone begins to disclose to a member of staff that a child / children has been abused or is currently being abused, we will:

- Take the information seriously. It is not our role to decide if the information is true or false. Our role is to report the concerns;
- Inform the person disclosing the abuse that the information cannot be kept confidential and must be passed on to the relevant statutory agencies;
- Listen to the person without asking unnecessary questions;
- Reassure the person that they are doing the right thing in disclosing the information;
- Remain calm and do not display strong feelings. This is particularly important where it is a child who is disclosing. A display of strong feelings may be misconstrued by the child as a sign that they have done something wrong and they may refuse to disclose further information;
- Not attempt to investigate the incident / allegation or ask probing questions. This is to avoid possible contamination of any investigation
- If a child is at imminent risk of harm the priority is to ensure the safety of the child. If immediate emergency support is required (eg Police Scotland / ambulance) staff should not delay in arranging the appropriate support;
- In ensuring the child's safety, staff must not put themselves at risk of harm;
- Inform the child and adult that they will make an assessment about reporting concerns. It is acknowledged that on occasion this may not be possible; and
- If in any doubt staff should discuss the situation with their line manager or Group Protection Liaison Manager.

5. Reporting Concerns

Using supporting procedures and guidance, staff will make an assessment whether to report suspicions or concerns raised about a child.

If we are passing on concerns reported to us by a third party (eg neighbour) or disclosures by the parent or care giver, 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 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 child protection concerns involving someone who uses their services to the Care Inspectorate via the E-Forms System.

6. Designing and Delivering Services

Improving outcomes for children and young people is a fundamental objective for all services and organisations. IioF 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.

In addition to being alert to, and responding to, signs of abuse and neglect, we will proactively design and deliver services that promote the wellbeing of children and their families. This will be achieved by our W.E. Solutions Platform: part of our high quality support services, and will fully support Getting It Right For Every Child (GIRFEC).

GIRFEC is the national approach in Scotland to improving outcomes and supporting the wellbeing of our children and young people by offering the right help, at the right time, from the right people. It supports children and their parent(s) to work in partnership with the services that can help them. It puts the rights and wellbeing of children and young people at the heart of the services that support them.

Our approach to delivering excellent homes, services and products will help to support, promote and safeguard the wellbeing of our most vulnerable families allowing children and young people the opportunity to flourish ensuring they get the help they need, when they need it.

Some of the ways in which we will do this are detailed below:

6.1 Group Protection Liaison Manager

Within The Group we have a dedicated link 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 IioF, creating the best solutions for all customers in relation to child protection.

Child protection is not something that can be addressed in isolation. Partnership working is a key feature of our response to child protection. The Group Protection Liaison Manager represents the Group in a number of multi agency setting for

example, Glasgow's Child Protection Committee and Multi Agency meetings in relation to Child Sexual Exploitation.

In addition to the strategic focus, there is also an operational focus responding to any concerns staff have for children who may be at risk of abuse or neglect.

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. In order to deliver excellent services for our customers we need to understand who our customers are and what services they need and want.

Through our appropriately differentiated range of products that can be delivered to meet the needs of our customers we can design and deliver service outcomes for these 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 child protection and promoting the wellbeing of children so that our customer facing staff will be empowered to deliver personally tailored holistic packages of services to our most vulnerable families. Every interaction with our most vulnerable households where there are children should feel personal and should capture individual priorities for that family as we know there is no such thing as a one size fits all.

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, supporting people through life transitions, and building lasting relationships.

We will draw down on this support as and when required to support our most vulnerable families.

The inbuilt flexibility in our W.E. Care model allows us to recognise and respond effectively to the challenges our most vulnerable families face. Through our unique approach we will ensure self-reliance and control can be facilitated and maintained when it is right for the family; safe in the knowledge that that re-engagement can easily be facilitated at any time.

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

6.4 Housing Options and Solutions

Our housing options model is now embedded into our processes and is very much considered business as usual. During the life of this policy we will work with colleagues to further develop staff knowledge of housing options, wraparound

supports and pathways available for accessing specialist support to our most vulnerable families, ensuring any concerns highlighted during our housing options interviews are responded to.

In circumstances where the current home is no longer safe for the children to reside (eg domestic abuse) we will work with the family to identify the most suitable housing solution for them, which may include assisting with moving to a new home. We will do this through MyHousing our new Housing Information Advice and Letting platform.

6.5 Wheatley Foundation

Within Wheatley Foundation: the Wheatley Group's charitable trust we have Foundation Officers. Our Foundation Officers develop innovative solutions, finding creative ways to support our customers and their communities. Some of the initiatives they have supported or are in development include:

- Win Carnwadric – a project working with vulnerable adults, providing counselling, child services and support;
- West Young Carers – a group for children and young people who have a caring responsibility for a parent and / or siblings, due to parents ill health, alcohol or drug dependence;
- Aberlour Youth Project – providing services to vulnerable young people; and
- Within Dunedin Canmore we have Dunedin Canmore Youth Projects - A joint initiative between Dunedin Canmore and City of Edinburgh Council - providing a range of services and activities for children and young people aged 12 – 24 years, ranging from youth cafes to employability support hubs.

The benefit of being part of the Group has now facilitated new inter subsidiary collaborations being developed between the Foundation and Loretto Care. Such as the proposal for a family hub in one of the multi storey flats community rooms in the north east of Glasgow.

6.6 Wraparound Support

Our ambition on 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 families as we recognise the importance of having a warm safe home environment where children can flourish. We have designed practical wraparound supports services to benefit children and families in our communities. We brought many of our wraparound supports together into one wraparound support division: Wheatley 360. We launched Wheatley 360 in April 2018. Some of the wraparound support services are listed 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 offers support for 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 wraparound services identify and tackle the root of the main problem.

Welfare Benefits Advisors are our in house officers who advise families 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.

Fuel Advisors support families 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.

Lone Parent Support and Advice Network is a partnership with One Parent Families Scotland. They provide weekly group support sessions for lone parents in the Maryhill area of Glasgow with further groups planned to open. Practical and social support is provided to lone parents who may need advice and help to access employment, training and volunteering opportunities or to apply for welfare benefits.

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.

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 children, promoting environments for them to flourish;
- Our staff are confident in dealing with all aspects of child protection being alert to signs of abuse and neglect, knowing when to make referrals to Social Work and / or call Police Scotland;
- We have appropriate pathways and referral systems in place to ensure children and their families 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:

Legislation

Social Work (Scotland) Act 1968

Children (Scotland) Act 1995

Human Rights Act 1998

Children's Hearings (Scotland) Act 2011

Children and Young People (Scotland) Act 2014*

UN Convention on the Rights of the Child

Data Protection Act 2018;

General Data Protection Regulation (Regulation (EU) 2016/679)

Strategic Drivers

- National Guidance for Child Protection in Scotland (2014),
- Getting it Right for Every Child (GIRFEC)

*The Named Person Service that was due to be implemented in August 2016 has been postponed. This follows a decision from the United Kingdom Supreme Court on 28th July 2016. It ruled that the information sharing provisions of the Children and Young People (Scotland) Act 2014 are not compatible with Human Rights and current law. The Scottish Government is proposing amendments to rectify this. We will update our Toolkits, when the scheme is implemented. It is important to note that child protection processes are not affected by the Supreme Court Judgment.

This policy also takes account of the Data Protection Act 1998.

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 key stakeholders. Similar consultation will take place for all proposed policy reviews.

10. Support, Procedures, Awareness and Training

To enable us to protect the children in our communities, all staff will be made aware of the existence of this policy, their responsibilities and the benefits of delivering this policy.

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 child 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 Performance Monitoring Framework in Child Protection.

We will use trend analysis from the Performance Monitoring Framework to inform our future allocation of resources and identify training and support needs.

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.

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.