

Child Protection Policy

Approved by Wheatley Group Board April 2017
Updated July 2022

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Approval body	Group Board
Date of approval	25 August 2022
Review Year	2025
Customer engagement required	No
Trade union engagement required	No
Equality Impact Assessment	Yes

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
Date Policy Reviewed	July 2022
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
Revised to incorporate new Group strategy	Section 1, Section 3.2, Section 6, Section 6.1, Section 6.2, Section 6.6, Section 7
Revised to bring Child Protection figures up to date	Section 1
Revised to bring social context up to date	Section 1
Revised to incorporate updated version of National Guidance for Child Protection in Scotland 2021	Section 2.2, Section 8
Revised to include wording that reports should be made to the statutory authorities and directing readers to the appropriate section in the document for details on this	Section 2.3
Revised to include point around bespoke training for staff in relation to identifying and responding to recognised Child Protection issues and our communications and engagement strategy	Section 3.2
Revised to enhance information on how concerns of child protection may originate and that they could be disclosed at Multi Agency meeting attendance.	Section 4
Revised wording around reporting concerns to the local authority and contact Police if any criminality established	Section 4, Section 5
Revised to take cognisance of fact there is now a Group Protection Team and no longer only a Group Protection Liaison Manager	Section 4, Section 5, Section 6.1
Revised to provide details of requirement to report Child Protection concerns into the Local Authority Area where the child resides, along with a link to contact details for all 32 Areas	Section 5
Reviewed to take cognisance of the creation of our wraparound support division, Wheatley 360	Section 6
Revised to update current multi-agency meeting structure attendance to support Child Protection	Section 6.1
Revised to account for organisational change to Wheatley Care	Section 6.3, Section 6.6

Revised to include supports available to help victims of domestic abuse remain within their property if this is this preferred option	Section 6.4
Revised to bring section on the Wheatley Foundation up to date with activity across Group	Section 6.5
Revised to incorporate changes to new divisions created within the organisation and split of services originally sitting within Wheatley 360	Section 6.6
Revised to update the section on our Eat Well service, to take cognisance of new element to service where supermarket vouchers are provided to support customers.	Section 6.6
Revised to update the section on the current wraparound services provided to help support families within our communities, adding our Safe and Secure Home Safety service and removing the partnership with One Parent Families Scotland, which is no longer in operation.	Section 6.6
Revised to include the Children (Scotland) Act 2020, where there will be modifications to the Children (Scotland) Act 1995 due to be implemented soon and also updated with Domestic Abuse legislation now in force	Section 8
Revised to remove reference to the planned 'named person scheme', where this proposed legislation was eventually withdrawn in September 2019	Section 8
Revised to reflect change of terminology from 'significant case review' to new term for process of 'learning review'.	Section 9
Revised to reflect change to staff performance tool from My Contribution to My Appraisal and to include information on Group Protection activity (including Group Protection Matters bulletin), use of online learning portals for delivery and access to centres of excellence.	Section 10
Updated to confirm Performance Management Framework established and utilised to monitor trends	Section 11
Revised to incorporate the correct section of the Group GDPR policy that must be considered which is appendix 2 and not appendix 3	Section 12
Revised to remove specific CoE's this work feeds in to, as it has expanded and is further reaching now and crosses the network of CoE's.	Section 13
Deletion of reference to complaints procedure being available at local offices in line with new operating model	Section 14
Section added to include reference to data and information provided throughout the document	Endnotes

Contents

1. Introduction
2. What is Child 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) 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 Your Home, Your Community, Your Future 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 remains a concern, with 2,104 children registered as of 31st July 2021¹. It is of note that this figure is a 20% decrease on the previous year's figure, however it is important to recognise that this reporting period covered 1st August 2020 – 31st July 2021, which was during the height of the global covid pandemic where challenges were experienced around access to, and provision of services. 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, particularly in the current climate of the global covid pandemic, Brexit, and the cost-of-living crisis, alongside ongoing challenges of welfare reforms that were introduced since 2015. 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?

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 means:

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 refers to the processes involved in consideration, assessment and planning of required action, together with actions themselves, where there are concerns that a child may be at risk of harm.

Child Protection procedures are initiated when Police, Social Work or Health determine that a child may have been significantly harmed or may be at risk of significant harm.

(National Guidance for Child Protection in Scotland, 2021)

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 to the statutory agencies tasked with investigating Child Protection concerns (see section 5 below for how to report concerns).

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, inadequate, 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 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 receives 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 provide bespoke **training** for our frontline staff, to ensure they are able to confidently recognise and respond to any issues of concern in relation to Child Protection;
- 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 Your Home, Your Community, Your Future 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;
- We will have a clear **Communications and Engagement Strategy** to support our prevention activity and facilitate getting key messaging in this area out across our networks;
- Through our ground-breaking. **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 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;
- Identification through customer insight from ASTRA; or
- Through attendance at a multi-agency partnership meeting (such as Domestic Abuse forums including Multi Agency Risk Assessment Conference (MARAC), Multi Agency Tasking and Coordination (MATAC) or Disclosure Scheme for Domestic Abuse Scotland (DSDAS).

These reports can either originate over a period of time or be in response to a specific incident; and can be resultant from direct observations or take the form of reports from a known person as noted above, or from an anonymous source. It could also be the case that the child/children are known to Social Work Services or have an existing Child's plan or may become part of a household where a person has committed any offences mentioned in Schedule 1 of the Criminal Procedure (Scotland) Act 1995.

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) to inform our response and take any necessary action.

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

- Take the information seriously. It is not our role to investigate the concerns, 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;
- Report our concerns to the appropriate Local Authority and if it is believed a crime has been committed, also report our concerns to Police Scotland accordingly; and
- If in any doubt staff should discuss the situation with their line manager and/or the Group Protection Team.

5. Reporting Concerns

Using supporting procedures and guidance, we will 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 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 and/or the Group Protection Team.

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.

It is important that any Child Protection concerns are reported into the Local Authority Social Work Department where the child/children reside, using the defined reporting process for each area. You will find details of each Child Protection Team across the 32 Council Areas here, with links to contact details to report concerns:

<https://www.childprotection.scot/useful-links/council-social-work/>

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. Your Home, Your Community, Your Future 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 Wheatley 360 division: part of our high-quality wraparound 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 Team

Within The Group we have a dedicated Group Protection Team who form part of Wheatley 360: our wraparound support division.

The Group Protection Team is focussed on driving forward the strategic outcomes contained in Your Home, Your Community, Your Future, through creating the best solutions and outcomes 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 Team represents the Group in various multi-agency forums, for example Child Protection Committees, Violence Against Women and Girls Committees, Domestic Abuse forums, 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. Our attendance at the Multi Agency Risk Assessment Conference (MARAC), Multi Agency Tasking and Coordination (MATAC) and Disclosure Scheme for Domestic Abuse Scotland (DSDAS) meetings play a huge role in supporting this.

6.2 Personalised Customer Service Outcomes

Our vision for 2021-2026 in Your Home, Your Community, Your Future, is to deliver outstanding personalised customer service – putting our customers in control of how they engage with us by offering a unique service mix. 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 re-engagement can easily be facilitated at any time.

Our specialist teams within Wheatley Care 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. If remaining within the property is the most preferable and best option for the family, then we will work to support them remain by offering access to Wheatley wraparound services such as our Safe and Secure Home Safety Service, to help with feelings of safety within the property and provide safety planning advice.

6.5 Wheatley Foundation

Wheatley Foundation, The Groups Charitable Trust focuses on 2 main strategic aims supporting Wheatley households and families:

- maximising access to employment, training and learning opportunities for customers of all ages;
- supporting customers by tackling social exclusion and alleviating the impact of poverty.

The Foundation Team develop innovative solutions and creative ways to work with partners to support customers and communities. This includes providing families and households with a variety of opportunities and increasing access to services and support with employability, financial inclusion, digital skills, and community activities. This includes;

- Wheatley Works employability advice and support;
- Practical support to households through Eat Well, My Great Start, Home Comforts and Higher Education bursaries;
- Services for children and young people such as the Imagination library books for pre-school children; Youth Projects providing a range of services and activities for young people in the East; Click and Connect digital provision in local centres, and a range of local activities and community support.

6.6 Wraparound Support

Our ambition in Your Home, Your Community, Your Future is that we offer services that 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, which launched in April 2018 and sits within our Communities division. Some other wraparound support services sit within our Care division and some within our Wheatley Foundation. A selection of these wraparound services in place to support our children and families 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 can offer support to customers experiencing severe financial hardship by providing supermarket vouchers. This allows customers to access food directly themselves, providing an element of choice and empowerment, whilst other wraparound services identify and tackle the root of the main financial issue.

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 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.

Wheatley 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.

Safe and Secure (Home Safety) Service offers customers who require this, advice, and guidance in relation to safety planning, as well as access to pioneering products to enhance feelings of safety, including video doorbells, window/door alarms, door braces and personal safety alarms. This service is of particular use for victims of domestic abuse and their children.

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 Your Home, Your Community, Your Future Strategy.

8. Legislation and Strategic Drivers

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

Social Work (Scotland) Act 1968

Children (Scotland) Act 1995

Children (Scotland) Act 2020

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);

Domestic Abuse (Scotland) Act 2018.

Strategic Drivers

- National Guidance for Child Protection in Scotland (2021);
- Getting it Right for Every Child (GIRFEC).

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 learning 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

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 Appraisal (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 through our centres of excellence and online learning portals. The Group Protection Team will also host regular overview sessions, surgeries, or case discussions as/when required for teams when there are either identified issues, or on request; to continue to build resilience and confidence in this area for staff.

Regular blogs will be added to Wheatley Group Intranet Systems to ensure staff awareness levels are maintained and the Group Protection Matters Bulletins will be issued to all frontline teams, with information on Child Protection featuring regularly

Staff will be supported by our Group Protection Team 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

The Group Protection Team have developed a Performance Monitoring Framework to capture information on Child Protection across Group and routinely provide management information on all areas of importance and relevance pertaining to Child Protection. This Performance Monitoring Framework will continue to evolve as the service further develops in this area.

We use trend analysis from the Performance Monitoring Framework to inform our activity, future allocation of resources and to 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 the legal implications of doing so, not simply the terms of applicable legislative requirements. Appendix 2 of Wheatley Group Data Protection Policy must be considered.

Once a decision has been made as to whether 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 network of CoE’s. Through the CoE’s 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 Group and subsidiary websites.

Endnotes

- 1 Children's Social Work Statistics Scotland 2020/2021
<https://www.gov.scot/publications/childrens-social-work-statistics-scotland-2020-21/documents/>