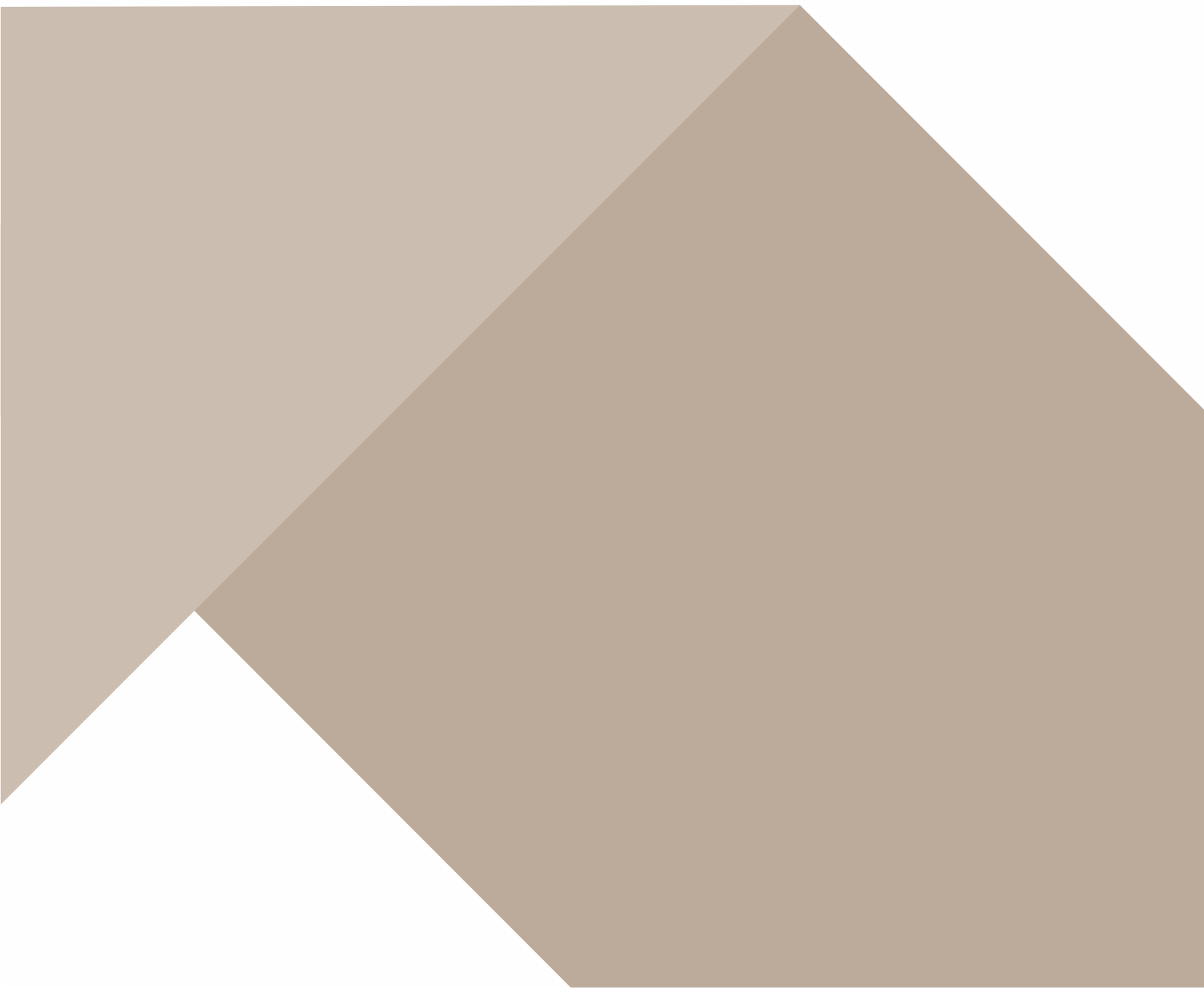


Protecting People Policy Framework.

April 2016

Updated July 2022



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如果你向我們提出要求，我們可以為你提供本資訊的其他語言的版本，或者是盲文或磁帶。如果你需要本資訊的任何一種這些版式的版本，請聯繫我們，電話號碼是 0800 479 7979。

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

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Record of Amendments

Date Approved by Wheatley Group Board and Designated as a Group Policy	April 2016
Date Reviewed	July 2022
Amendments	
Revised to bring up to date around Group structure and reach	Section 1
Revised to bring up to date around current Group strategy and strategic priorities set out within	Section 1, Section 2.2, Section 3.1, Section 3.2, Section 3.3, Section 3.4, Section 4.1, Section 6
Revised to bring figures around Child Protection up to date and link provided to publication	Section 1, Section 4.1
Revised to include our sector leading training for staff and communications and engagement strategy to support our prevention activity	Section 2.2
Revised to include details of the new National Guidance for Child Protection in Scotland (2021) as the updated version from the 2014 iteration previously quoted.	Section 4.1
Revised to reflect that Child Protection Policy is now fully embedded across Group to ensure a consistent approach	Section 4.1
Revised to reflect organisational change to Wheatley Care	Section 4.2
Revised to reflect that Adult Support and Protection Policy is now fully embedded across Group to ensure a consistent approach	Section 4.2
Revised to bring Domestic Abuse figures up to date and link provided to publication	Section 4.3
Revised to include information on the multi agency forums we actively attend in relation to domestic abuse, including MARAC, MATAC and DSDAS	Section 4.3
Revised to reflect that the Domestic Abuse Policy is now fully embedded across Group to ensure a consistent approach	Section 4.3
Revised to specify exact part of legislation which outlines RSLs as duty to cooperate agencies	Section 4.4
Revised to update the categories of offender managed under MAPPA in line with revised changes to the third category of offender	Section 4.4
Revised to bring Registered Sex Offender figures within Scotland up to date and link to publication	Section 4.4
Revised to reflect that MAPPA Policy and allocations processes in relation to Registered Sex Offenders is now fully embedded across Group	Section 4.4
Revised to include staff training and partnership establishment as a further 2 success measures around how we'll know we're making a positive impact	Section 6
Revised to include GDPR and Domestic Abuse specific legislation, as well as inclusion of the Children (Scotland) Act 2020, where there will be modifications to the Children (Scotland) Act 1995 due to be implemented soon	Section 7

Revised to update wording on process from significant case reviews to learning reviews in line with change	Section 8, Section 11
Revised to include other forms of awareness raising by Group Protection, including WE Connect page and Group Protection Matters Bulletin	Section 9
Revised to reflect that the Group Protection Performance Monitoring Framework has been established	Section 10
Revised to include information on requirement to share information for Domestic Abuse cases and reference to Group Protection policies supporting with this	Section 11
Revised to reflect that the Group Protection Team tie into more than the Protecting Communities CoE and tie into the network of CoE's	Section 12
Section added to include references to data and information provided throughout the document	Endnotes

1. Protecting People Introduction

The Wheatley Group (The Group) is Scotland's leading housing, care, and property management organisation. It comprises of ten subsidiary organisations, which includes five Registered Social Landlords (RSLs), one care organisation and three commercial organisations. Each subsidiary has responsibility for managing service delivery to their own tenants and customers.

The Group works across 19 local authority areas delivering a range of award-winning services to over 210,000 people, this includes: socially rented properties; mid-market rent properties; commercial properties; factoring services and care services.

Whilst we have a large geographic footprint across Scotland, we remain deeply rooted in the communities that we serve. We do this by actively encouraging each subsidiary to retain its own identity and autonomy for the way in which it delivers its respective services and by adopting localised models of service delivery to meet local needs.

Your Home, Your Community, Your Future – our five-year strategy – highlights a shared vision and passion for improving the homes and lives of those in our communities. It also provides a commitment to cementing our reputation as one of the UK's leading customer focused organisations.

By developing our Protecting People Policy Framework, we are taking our customer service to the next level, building on our existing high standards and passion for exceptional customer service.

The Group wide approach to keeping our communities safe will also provide a strong platform for sharing learning and best practice across all subsidiaries.

We firmly believe that we should do all we can to ensure our communities are safe and protected from harm. All our customers are entitled to live their life without fear, harm, or abuse. Notwithstanding this, we recognise that there will be occasions where children, young people or adults may be at risk of harm, in that situation we will do all we can to minimise the risk.

By embedding our Protecting People Policy Framework, we will define what it really means to keep our communities safe and set sector leading standards in Group Protection service areas.

Our Protecting People Policy Framework includes four key areas that have been identified as instrumental for supporting and protecting our communities. A suite of Group policies in each of the key areas has been developed to underpin the framework. These areas are:

- Child Protection
- Adult Support and Protection
- Domestic Abuse
- Multi Agency Public Protection Arrangements (MAPPA)

Due to the complex nature and individual importance of each of these service areas, it is necessary, and regarded as good practice, to develop separate policies. We do, however, recognise that each policy does not sit in isolation, as they are often interrelated. For example, of the 6,374 concerns identified at child protection case conferences during 2020/2021, the most common concern identified was domestic abuse (16%), followed by neglect (15%), parental mental health problems (15%), parental substance use (15%) and emotional abuse (12%) ¹. There were 2,104 children on the child protection register on 31 July 2021.

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

2. Policy Framework Aims and Objectives

2.1 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.

2.2 Our Objectives

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

- Where possible we will implement processes to **prevent** situations where harm may arise;
- We will ensure our policies are **fit for purpose** and promote the wider prevention activity at both a local and national level;
- We will have a clear **Communications and Engagement Strategy** to support our prevention activity and facilitate getting key messaging around Group Protection activity out across our networks;
- We will build robust **risk mitigation** processes into our policies, for example, we will further develop our allocation processes to, and around, high risk offenders;
- We will work in **partnership** with relevant organisations 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 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 what constitutes protecting our communities and ensure everyone who is employed or involved in our organisation is aware of this. Leaders within the organisation will support and promote this;
- Our staff will receive **training** to the highest standard utilising specialist services and organisations to work with our Wheatley Academy to facilitate 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;
- Our approach will be sufficiently **flexible** to ensure we have our customer's wellbeing at the heart of our processes, and we will work with them to deliver a range of personalised services to support and protect them from harm;

- Where possible we will ensure that Group subsidiaries adopt a **consistent approach** to implementing this framework.

Underpinning all our objectives will be our suite of policies clearly detailing how we will make homes and lives better and safer for all.

3. Helping us Achieve Your Home, Your Community, Your Future

- 3.1 Our Your Home, Your Community, Your Future Strategy sets a very clear benchmark for the standard of service our customers should expect over the next 5 years and beyond. We will use our qualitative and quantitative customer insight to ensure we have an in-depth understanding of all customer bases. This will inform our strategic planning, design of services, and enable us to intervene at the earliest opportunity.

The five strategic themes allowing us to deliver our vision of customers having control over their services, communities and lives are:

- Delivering Exceptional Customer Experience;
- Making the most of our Homes and Assets;
- Changing Lives and Communities;
- Developing our Shared Capability; and
- Enabling our ambitions.

Our Protecting People Policy Framework cuts across a number of our strategic outcomes and will support and assist other parts of the business to achieve these. The key platforms it will support are Delivering Exceptional Customer Experience, Changing Lives and Communities and Developing our Shared Capability.

Highlighted below are examples of ways in which our Protecting People Policy Framework will directly support our Delivering Exceptional Customer Experience, Changing Lives and Communities, and Developing our Shared Capability platforms:

3.2 Delivering Exceptional Customer Experience

Our Your Home, Your Community, Your Future strategy outlines that *providing exceptional experience is, and always will be, at the heart of everything we do. Our customers deserve the very best and through the life of this strategy, that is what we will deliver.*

We will assist and support the realisation of this strategic vision through our Protecting People Policy Framework by:

- Working closely with partners and key stakeholders we will ensure our allocation processes to, and around, high risk offenders are as safe as possible. This will minimise the potential for putting our customers at risk of harm;
- We will raise awareness and provide training to staff to ensure they are adept at spotting early signs of when a customer may be at risk of harm;
- Developing and raising awareness of appropriate support pathways for vulnerable or at risk customers;
- Providing a seamless customer service. For example, when managing the risk around high-risk offenders, our customers will not and should not be aware of the work being undertaken to protect and keep them safe. Instead, they will experience a high-quality, personalised customer journey.

3.3 Changing Lives and Communities

Through our Changing Lives and Communities strategic theme, *our aim is to deliver safe, calm, and peaceful communities where people want to live.*

We will assist and support the realisation of this strategic vision through our Protecting People Policy Framework by:

- Having bespoke Group Protection Policies detailing our strategic response for dealing with any issues impacting our customers from living safely and free from harm;
- Transforming traditional responses to domestic abuse by giving our customers unrivalled choice in the options available to them. One way in which we will maximise choices for our customers is through our Housing Options Model;
- Deliver services to support customers with tenancy sustainment, helping them to feel empowered and confident to remain within their home, such as through access to service provision from our Safe and Secure Home Safety Service;
- Working collaboratively with partners to ensure our staff are empowered and confident in supporting our customers;
- Designing our support services in a way that they are easy to access and re-engage with as circumstances change;
- Supporting our customers returning to the community after periods in custody to assist tenancy sustainment; and
- Ensuring our customers receive the appropriate support and advice through the provision of wraparound services and signposting to specialist agencies.

3.4 Developing our Shared Capability

Within this theme of our strategy, we set out our ambition that *our staff will be role models in developing relationships of trust and ensuring our customers feel that we care about them. A significant part of this is that they will be fully equipped to empower and inspire customers to lead.*

We will assist and support the realisation of this strategic vision through our Protecting People Policy Framework by:

- Challenging misconceptions around domestic abuse through awareness raising and appropriate training for our staff;
- Provide sector leading training for staff across the organisation in all areas of Group Protection activity, to ensure they are adept at recognising and responding to issues of harm that affect our customers;
- Design and embed clear support pathways for staff to access the appropriate advice, support and services to help keep our customers free from harm or abuse;
- Development of a communications strategy to raise awareness of the safeguarding issues impacting our customers, to ensure staff receive consistent and clear messaging around risks, reporting mechanisms, and how to access the appropriate support.

4. Our Policies within the Framework

The policies that underpin our Protecting People Policy Framework will provide a clear strategic statement on how we will plan and deliver services to keep our communities safe within each of the following Group Protection areas:

4.1 Group Child Protection Policy

Child 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 in an institutional setting, by those known to them or, more rarely, by a stranger. Types of abuse can include physical, emotional, or sexual.

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.

The National Guidance for Child Protection in Scotland (2021) acknowledges that whilst housing staff will not be directly involved in the investigation of suspected or reported abuse, we should still play an active role in supporting and identifying vulnerable children. This early intervention can play a key contributing role in identifying children and young people who may require support and assistance.

There were 2,104 children across Scotland on the child protection register as of 31 July 2021. There has been a 20% decrease in children on the child protection register since 2020, which is the lowest figures since 2002, however cognisance must be taken around the timing of this in line with the global covid-19 pandemic ¹.

Our Your Home, Your Community, Your Future strategy provides a commitment to designing a range of person-centred services based on in depth customer insight for all our customers. By broadening our philosophy to include children, this will mean we are truly supporting our customers to reach their full potential.

Our Child Protection Policy puts children at the heart of our processes and at the forefront of staff thoughts. For example, when Antisocial Behaviour Intervention and Prevention Officers are investigating incidents of antisocial behaviour, if there are any children in the household, we will focus on the child by ensuring they are not at risk. If appropriate, we will ensure referrals to statutory agencies are made timeously.

4.2 Group Adult Support and Protection Policy

The Adult Support and Protection (Scotland) Act 2007 was introduced to make provision for protecting adults who are unable to safeguard their own interests and are at risk of harm or self-harm, including neglect. The 2007 Act defines Adults at Risk, through a 3-Point Test as adults aged 16 years or over, who:

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

Many vulnerable adults must rely on others to help them with basic day-to-day living. Whilst the majority have excellent care provision, some are at risk of harm. This could be due to another person, or people, deliberately taking advantage of the adult. But it could also be the adult who is unintentionally putting themselves at risk, simply because they don't have the right level of support in place. Harm can take the following forms:

- Sexual Harm
- Neglect
- Physical
- Institutional
- Verbal
- Financial or material
- Discriminatory
- Psychological/emotional
- Self-Harm

Through our customer research and segmentation work, we know a significant proportion of our customer base is vulnerable. Whilst our staff are already competent at responding to our customer's needs, often utilising group wraparound support services and signposting to specialist agencies, the addition of Wheatley Care to the Group brings significant expertise in adult support and protection.

When developing our Group wide Adult Support and Protection Policy we utilised the expertise of Wheatley Care, who are advanced in their awareness of Adult Support and Protection, to ensure that all subsidiaries are working to the same high standards.

Our Group Adult Support and Protection Policy provides a clear framework, through which we can demonstrate the positive impact our person-centered approach is having on our customer's lives.

4.3 Group Domestic Abuse Policy

We know that domestic abuse has been, and continues to be, a significant problem in our communities. There were 65, 251 incidents of domestic abuse reported to Police Scotland during 2020/21, where 80% of the victims were female. Of significance for Wheatley as Scotland's leading housing, care, and property management organisation, is that in 2020/2021, 91% of all reported incidents occurred in a home or dwelling ².

This, without doubt, still underestimates the problem, as Police Scotland and other domestic abuse specialist services confirm high levels of underreporting.

We have well established processes in place to assist those at risk of, or experiencing domestic abuse, through individual subsidiary allocation policies, our housing options work and our duties under homelessness legislation.

In addition to this we participate in Multi Agency Risk Assessment Conferences (MARAC), Multi Agency Tasking and Co-ordinating meetings (MATAC) and Disclosure Scheme for Domestic Abuse Scotland (DSDAS) meetings and have done so for several years. These are meetings where the highest level of victim and most prolific domestic abuse perpetrators are identified, and action taken to safety plan for the victim and minimise the risk of harm the perpetrator poses.

The Community Improvement Partnership (CIP) provide us with detailed intelligence on all antisocial and violent behaviour in or within 20 meters of Wheatley properties. This information can be broken down by subsidiary and then by Local Housing Office or 'patch.' An agreed Information Sharing Protocol is in place to facilitate this activity.

Analysis of this data shows that, between 1st April 2021 and 31st March 2022 there were 3,293 incidents recorded at, or within 20 metres of, a Wheatley property in relation to a domestic incident.

This shows the impact of domestic abuse across our communities and customer base, and the need for us to continuously develop our wraparound support services and W.E Care model to fully include support for those affected by domestic abuse.

Our Group Domestic Abuse Policy provides our strategic response to this significant and on-going issue. It clearly articulates the way in which we will respond to our customer's needs, this will include both the victim and the perpetrator, and allows for a consistent approach to be adopted across all subsidiaries within Group.

4.4 Group MAPPA Policy

Multi Agency Public Protection Arrangements (MAPPA) formalise the arrangements between agencies who work together and share information to mitigate the risk certain categories of offender pose (ie Registered Sex Offenders, Restricted Patients and Other Risk of Serious Harm Offenders (previously referred to as violent offenders)).

RSLs are a Duty to Co-operate Agency under The Management of Offenders etc (Scotland) Act 2005 (Specification of Persons) Order 2007. As such, we do not have responsibility for assessing or managing risk. We do, however, contribute to the risk management through effective information sharing with the Responsible Authorities.

Registered Sex Offenders

As of 31st May 2022, there were 6,188 Registered Sex Offenders in Scotland. This is broken down to 4,565 Registered Sex Offenders residing within the community and 1,623 Registered Sex Offenders in custody or hospital ³. The national increase is reflected in the number of Registered Sex Offenders residing in our communities.

We have robust processes in place in relation to allocations of tenancies to Registered Sex Offenders and for any allocations within close proximity to a Registered Sex Offender.

Our Group MAPPA Policy provides a clear statement on how we work with our partners, across all the local authority areas in which we operate, to minimise the potential risk Registered Sex Offenders pose.

Restricted Patients

Restricted Patients are persons detained in hospital under a compulsion order with a restriction order. They have usually committed an offence punishable by imprisonment but because of mental disorder are not imprisoned, but ordered to be detained in hospital for treatment, without limit of time. They are dealt with through a programme of treatment and rehabilitation - the aim being to prevent recurrence of offending by dealing with the mental disorder.

There are approximately 290 Restricted Patients in Scotland at any one time. Just over half are detained in the State Hospital with the remainder detained in local psychiatric hospitals or living in the community on conditional discharge.

Treatment plans for Restricted Patients are geared to individual circumstances and reflect the health and safety requirements of the patient, issues in relation to victims and their families and public safety considerations.

We have streamlined and improved our Community Care Allocations Process for Restricted Patients who are returning to the community. This process will be monitored to ensure positive outcomes are consistently being achieved and tenancies are being sustained.

To minimise the potential risk posed by the small number of Restricted Patients living in our communities we have, as part of the development of our Group MAPPA policy, developed and improved joint working arrangements with the relevant Health and Social Care Partnerships.

Other Risk of Serious Harm Offenders

Certain categories of the 'critical few' other offenders came under the risk management of MAPPA on 31st March 2016 (formerly referred to as violent offenders). It was envisaged that the number of individuals who meet the criteria to be classed as other risk of serious harm offenders would be low and the risk management of these offenders would be aligned to current arrangements for Registered Sex Offenders.

We work closely with the responsible authorities of Police Scotland, Health, Local Authorities, and the Scottish Prison Service to deal with these cases and support our strategic response to minimising any potential risk to our customers and communities.

5. When We Need to be Reactive

We will always aim to support and protect our communities from harm with interventions at the earliest possible opportunity; however, we acknowledge there will be occasions when this may not happen. In these situations, once we have been alerted to concerns, we will react to the needs of our customers appropriately and ensure we reduce the risk of further harm as far as possible.

We will use any learning from these situations to inform our future processes and where possible mitigate the risk of a similar situation.

6. How We will Know We are Making a Positive Impact on our Customers Lives and 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;
- Our staff are confident in dealing with all aspects of Group Protection;
- We have appropriate pathways and referral systems in place to ensure customers are getting the right support at the right time, first time;
- We have developed the appropriate partnerships to help achieve the best outcomes for our customers;
- Staff are well trained, informed and educated on all forms of Group Protection activity; and
- We are realising the vision and outcomes contained within Your Home, Your Community, Your Future.

7. Legal Framework

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

- Management of Offenders (Scotland) Act 2005;
- Children (Scotland) Act 1995;
- Children and Young People (Scotland) Act 2014;
- Adult Support and Protection (Scotland) Act 2007;
- Abusive Behaviour and Sexual Harm (Scotland) Act 2016;
- Data Protection Act 1998;
- General Data Protection Regulation (Regulation (EU) 2016/679);
- Housing (Scotland) Act 2001;
- Housing (Scotland) Act 2014;
- Domestic Abuse (Scotland) Act 2018;
- Children (Scotland) Act 2020.

8. 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 internal stakeholders and key partners. Similar consultation will take place for all proposed policy reviews.

9. Support, Procedures, Awareness and Training

We will ensure all staff understand this policy and deliver services in a consistent manner.

All staff will be made aware of the existence of this Policy Framework and their responsibilities to protect the most vulnerable people in our communities.

Training by both external partners and key internal personnel will be provided for all areas of Group Protection.

Regular blogs will be added to Wheatley Group Intranet Systems to ensure staff awareness levels are maintained, quarterly Group Protection Matters bulletins will be issued to frontline staff with key safeguarding content, and the Protecting People page on WE Connect will be kept fully up to date with all necessary information for staff to protect our most vulnerable customers.

Staff will be supplied with clear written pathways, a quick reference guide and a detailed toolkit on how and where to report concerns.

10. Performance Monitoring and Reporting

The Group Protection Team have developed a Performance Monitoring Framework to capture information on Group Protection areas and routinely provide management information across all workstreams.

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

Clear leadership and accountability mechanisms are well established and complemented with robust governance arrangements. Staff at all levels will be fully aware of the importance and benefits of delivering this Policy Framework.

11. Information Sharing, Confidentiality and Data Protection

Every enquiry into a child's death over the last 40 years has found that effective sharing of information within and between agencies is fundamental to improving protection of children and young people. The various enquiries all showed that no single service had a full, clear picture about what was going on in the child's life. In all cases, early indications of a threat to wellbeing had been missed or hadn't been responded to at the earliest opportunity. This is a theme that has been evident in all Group Protection areas where there have been learning reviews.

In cases of Domestic Abuse, it is the same in that no one single agency holds the full picture of risk a victim and their children face, therefore only by sharing information and working collectively, can the appropriate action planning around safety planning be undertaken in the best interests of the individual. The Group Protection Team have developed the appropriate channels for safe and secure information sharing and our suite of policies within the Protecting People Policy Framework draws this out.

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.

We will always adhere to the Wheatley Group Data Protection Policy and if in doubt will seek advice from the Group Information Governance Team.

12. Engagement and Communication

Within the Wheatley Group we have Communities of Excellence (CoE) which consist of various members of staff from across the Group.

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.

13. 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/>
- 2 Domestic Abuse Recorded Incidents Police Scotland – 2020/2021
<https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2021/11/domestic-abuse-recorded-police-scotland-2020-212/documents/domestic-abuse-recorded-police-scotland-2020-21/domestic-abuse-recorded-police-scotland-2020-21/govscot%3Adocument/domestic-abuse-recorded-police-scotland-2020-21.pdf?forceDownload=true>
- 3 Registered Sex Offender numbers in Scotland as of 31st May 2022
<https://www.scotland.police.uk/about-us/what-we-do/specialist-crime-division/sex-offender-policing-units/registered-sex-offender-rso-information/>