



## Child Protection and Protection of Vulnerable Adults Policy

Management Committee submission:	28 November 2023
Last Approved:	September 2019
Date Approved:	28 November 2023
Next Review date:	September 2026

### CHA Objectives:

- To work in partnership with others, supporting our tenants and other customers, to maximise opportunities for physical and socio-economic regeneration in Clydebank.
- To ensure that our resources are adequate to deliver our objectives by investing in our people, demonstrating value for money and through robust procurement practices.
- To promote social inclusion by applying principles of equality and diversity to everything we do.

### Regulatory Standards:

- The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.
- The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these objectives.
- The RSL conducts its affairs with honesty and integrity.
- The governing body and senior officers have the skills and knowledge they need to be effective.

**Any breach or non-compliance with legislation/regulatory requirements in relation to this Policy constitutes a Notifiable Event and the Regulator will be informed via the SHR Portal.**

***If you have difficulty with reading this policy, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.***

# Child Protection and Protection of Vulnerable Adults

## 1.0 Introduction

**Clydebank Housing Association (CHA) provides housing and related services to a wide range of people some of which may, at some point, be vulnerable to abuse or neglect.**

Clydebank Housing Association ('The Association') is committed to ensuring that staff are aware of their responsibility for safeguarding and promoting the welfare of all children, young people and adults and recognises its responsibility to take all reasonable steps to promote safe practice and to protect children and vulnerable adults from harm, abuse and exploitation. The Association acknowledges its duty to act appropriately to all allegations, reports and suspicions of abuse.

Through the implementation of this policy, the Association aims to do everything it can to protect children and vulnerable adults, and to ensure that all concerns for the welfare of a child or vulnerable adult are reported to the appropriate authorities.

## 2.0 Scope of Policy

This policy and related procedures apply to all employees, board/committee members and volunteers.

We have this policy in place because: -

- It is the law
- It is our duty as citizens and as staff to safeguard those that we work with
- It is our duty to take action if we think someone is at risk
- It protects staff and volunteers as well as the public

Children are at risk from: -

- Neglect
- Physical abuse
- Emotional abuse
- Sexual abuse
- Physiological abuse

## 3.0 Definition of “children” and “adults at risk” and “abuse”

**Child:** the “Protection of Children (Scotland) Act 2003 states a child will be considered anyone under the age of 18.

**Adults at risk:** The Adult Support and Protection (Scotland) Act 2007 seeks to protect and benefit adults at risk of being harmed and describes adults at risk as being person (aged 16 and over) who are:

- a) unable to safeguard their own wellbeing, property, rights or other interests
- b) are at risk of harm, and

c) because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than others who are not so affected.

An adult is at risk of harm for the purpose of the above if:

- a) another person's conduct is causing (or likely to cause) the adult to be harmed, or
- b) the adult is engaging (or is likely to engage) in conduct which causes (or is likely to cause) self-harm.

**Abuse:** is a violation of an individual's human and civil rights by any other person or persons. Friends, strangers, family members and professional staff can all be guilty of abuse. Abuse can include physical, mental, sexual, financial, discriminatory abuse and neglect.

Protection of Children (Scotland) Act 2003 - PoCSA states that each child has the right to protection from all forms of abuse, neglect and/or exploitation. It also states that children should have a right to express their views on any issues or decisions affecting them.

In the work we do, staff will promote the rights of children and adults at risk to be listened to and taken seriously so that an individual is able to express their views, thoughts, and concerns. Concerns about child protection and conduct towards adults at risk will be referred to Social Work in line with our procedures.

#### **4.0 Our Commitment**

Clydebank Housing Association recognises that child protection should not be treated in isolation. We aim to ensure that any vulnerable people, whether children, young people or vulnerable adults, are protected and kept safe from harm while they are with staff in our organisation.

We will take on board guidance given by West Dunbartonshire Council and others and will address recruitment and selection of volunteers and paid employees by doing the following: -

- 4.1** We accept that it is our responsibility as a group to check that all adults with substantial access to children have been appropriately vetted (PVG Scheme). We will not allow anyone who is full listed on the Disqualified from Working with Children List to work/volunteer in a childcare position within our organisation.
- 4.2** In line with our recruitment and selection procedures we will ensure that individuals, who are employed by The Association in a paid or voluntary capacity, are fit for the post they are appointed to. Where a post requires direct work with children or adults at risk, we will ensure that reasonable steps are taken not to appoint a person who is unsuitable or disqualified from working with these groups. A standard disclosure will be requested for all new staff. An Enhanced Disclosure will be requested only where this is considered relevant to the particular position. Recruitment documentation will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.

- 4.3** The Association will commission standard disclosure information for all existing staff as required. In the case of Senior Staff members, or other posts which merit/require, an enhanced disclosure will be requested. All disclosures will be renewed on an ongoing basis to ensure information is kept up to date. Any information found on disclosures that has not been declared by the staff member and approved by CHA may result in disciplinary procedures.
- 4.4** The posts of Community Workers (Centre81) will be required to have a Protection of Vulnerable Groups Scheme check (PVG) undertaken as a condition of employment. These post holders will be working with adults at risk within 'regulated services.
- 4.5** The Association will ensure through training that all staff are aware of their responsibility to protect children, young people and adults at risk. The training will include this policy and highlight the need to report child protection issues or concerns about conduct towards adults at risk.
- 4.6** We will ask for the names of two referees who will be prepared to provide a written reference for every job applicant who will be working directly with children, young people and adults at risk.
- 4.7** We will follow up each reference with a telephone call or personal contact, during which we will confirm the applicant's suitability to work with children. A record of this discussion will be kept in the applicant's personal file.
- 4.8** We will interview prospective members of staff and we will note at interview all previous experience of applicants in working with children.
- 4.9** The successful applicant will undergo induction training, which will give an overview of the organisation and ensure they know our purpose, values and services and structure. Relevant training and support will be provided on an ongoing basis and will cover information about their role and opportunities for practicing skills needed for the work. Training on specific areas such as Health and Safety procedures, identifying and reporting abuse and confidentiality will be given as a priority to new staff and will be regularly reviewed.
- 4.10** We will ensure that all staff involved in recruitment, training and supervision are aware of this policy and have received appropriate training and support to ensure its full implementation.

## **5.0 Child Protection and Adult at Risk Procedures**

The Association understands that in addition to making a referral (a written report) to Scottish Ministers, Child Protection issues concerning workers (paid/unpaid), children and young people must always be referred to the child protection agencies (i.e. social work and/or police) for appropriate investigation.

We believe that every child regardless of age has at all times and in all situations a right to feel safe and protected from any situation or practice that results in a child being physically or psychologically damaged. If we have suspicions about a child's physical, sexual or emotional wellbeing, we will take action.

Staff are encouraged to share concerns (if a staff member notices one or more things that lead us to think that someone is at risk) and/or disclosures (when someone actually tells you they are being abused) with **Lynette Lees, the Association's Chief Executive**, who is the designated staff member with responsibility for child protection/adults at risk issues. If the situation is clearly an urgent case, or we have serious doubts about the child's safety, we will contact Social Work Services or the Police immediately. If concerns are more general about a child's welfare, then we will discuss these with designated staff member, who may then make a referral to Social Work. It is important that all staff communicate concerns and/or disclosures accurately.

Signs of abuse are as follows, but not restricted to: -

- Unclean clothes
- Unkempt appearance
- Marks appearing regularly on their skin
- Hunger
- Depression
- Inappropriate language
- Aggression
- Not wanting to go home
- Not having food or money for food
- Clinginess
- Anxiety
- Discussing unusual/inappropriate things
- Parents not collecting child/completing forms, etc.

During the course of their work should a member of staff receive information or suspects that a child or adult at risk may have been, or is being, abused in any way the following action will be taken;

### **5.1 Concerns**

- Upon receipt of any information and/or suspicions, list the reasons why you are concerned by recording what you have seen, heard or know accurately at the time the event occurs.
- Do not discuss your concerns with the individual. Discretely share concerns with your senior officer or the designated staff member, away from the public. The senior officer will then share these concerns with the designated staff member.
- The designated officer should then decide whether or not to contact the police or the Social Work Department or choose to monitor the situation or speak to a guardian.

- Always REFER never INVESTIGATE any suspicions or allegations of abuse.

## 5.2 Disclosures – Listen and reassure the child or adult at risk

- If you think someone is telling you that they are at risk/being abused, you must keep calm, remain sympathetic and listen.
- Show that you take the child/adult at risk seriously and listen to what they are saying, reassure them that they can trust you, that they are safe and that you will pass on this information to people who will be able to support them.
- Tell them that you cannot keep anything that they tell you a secret but assure them that they have been brave by telling you. The information provided by the child/adult at risk should only be shared with those who need to know.
- Tell them that it is your job to tell your senior officer
- **Record** what they said or where you as a staff member has concerns, on the appropriate form (attached to this policy). Only ask the child/adult at risk questions to clarify what he or she has said. All facts, incidents, assessments, and discussions related to the suspicions should be recorded clearly and accurately. Opinions and conjecture should be avoided, and an attempt made to capture only facts. Such records should be kept securely and safely as per the Data Protection Act 2018/GDPR and other applicable data protection legislation.
- Speak to your senior officer or directly to the designated child protection /adults at risk officer as soon as possible and show him/her what you have written.
- Your senior officer or the designated child protection officer will then contact the local police and/or the Social Work Department.
- Always REFER never INVESTIGATE any suspicions or allegations of abuse.

## **DON'T**

- Ask any leading questions such as “What did they do to you?”
- Tell them that you can keep what they have told you a secret
- React in an emotional way to what they have told you
- Make ANY promises about what will happen next
- Tell anyone else (apart from your line manager or the designated Child Protection/Adults at Risk Officer

***If we have concerns we must act – it may be the final piece of the jigsaw that is needed to protect that child – or we may prevent further children from being hurt.***

### **5.3 Refer**

Any member of staff who has a concern or has received information from an individual must immediately inform the Association's designated child protection/adult at risk named person.

- The designated named person for Clydebank Housing Association is Lynette Lees, Chief Executive Officer. In the event that the named person detailed is not available the member of staff should make contact with Social Work.

**If urgent medical assistance is required, take the child or adult to the Accident and Emergency department, or telephone for an ambulance.**

Both the local Area Social Work Office and Police Office telephone numbers are to be found in the telephone directory. For ease of reference, they are noted below: -

<b>WDC Social Work Office:</b>	<b>0141 562 8800</b>
<b>Clydebank Police Station:</b>	<b>0141 308 1070</b>
<b>Out of Hours Social Work:</b>	<b>0300 3431505</b>

### **6.0 Child Sexual Exploitation (CSE)**

The sexual exploitation of children and young people is often hidden. In practice, it might involve children and young people being coerced, manipulated, forced or deceived into performing and/or other performing on them, sexual activities in exchange for receiving some form of material goods or other things, such as food, accommodation, drugs, alcohol, cigarettes, gifts, affection.

Sexual exploitation can occur through the use of technology and without the children's immediate recognition. Victims rarely directly disclose abuse, not recognising that they have been exploited and may believe they are in an 'adult relationship' with their abuser, due to the sophisticated grooming processes and power imbalance involved.

Where staff have concerns over the welfare of a child and suspect Child Sexual Exploitation, they should follow the Child Protection Procedures aforementioned.

### **7.0 Missing Children and Vulnerable Adults**

The links between going missing, sexual exploitation, homelessness and abuse are widely recognised. Children and young people who go missing are at particular risk with 1 in 6, who slept rough or with strangers experiencing sexual exploitation or serious violence while missing.

Clydebank Housing Association will assist the Police and/or Local Authority however possible in the search for children or vulnerable adults reported as missing. This will include utilising office space and staff to support in the search if required.

## **8.0 Disciplinary Procedures**

In the event that the referral to social work relates to the actions of a member of staff the Chief Executive will liaise closely with West Dunbartonshire Council Social Work department should there be the need to implement our disciplinary procedures. This is to ensure that our disciplinary action does not impinge on any criminal proceedings that may be implemented as a result of the Interagency Child Protection Procedures.

In the absence of the Chief Executive, the Senior Management Team will be responsible for liaising with Social Work.

## **9.0 Declaration**

Each member of staff dealing with children/adults at risk must sign the following statement: -

1, \_\_\_\_\_ accept and will adhere to this Policy on behalf of Clydebank Housing Association.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

## **10.0 Equality and Human Rights**

We will not discriminate on the grounds of Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, and Sexual Orientation. An Equality Impact Assessment has been carried out and none of these protected groups will be unduly affected by this Policy. The Policy applies to all.

The Association will provide equality of opportunity and fair treatment for all, ensuring that no individual or group is treated less favourably than anyone else. We work closely with community stakeholders, to provide assurance that we are achieving these aims.

The Association will meet, and where appropriate exceed our obligations under the Equality Act 2010, including the general equality duty in the Act, to ensure we do not discriminate against, harass or victimise a person because they have one or more of the nine protected characteristics described in the Act.

An Equality Impact Assessment has been carried out as part of the review of this policy, in order to assess where the aims of this policy may have a positive, negative or neutral impact upon any of the nine Protected Characteristics set out in the Equality Act 2010



**For Office Use Only – Actions**

Customer Consultation Required/Arranged	No
Intranet Update	Yes
F Drive Update	Yes
Website Update	Yes
Leaflet change required?	No
Newsletter Promotion?	No
Other information updated, e.g. posters, automatic email responses, post cards, answering machine messages, etc.	No
Equality Impact Assessment completed	Yes
Policy Declarations signed by staff	Yes

**Appendix 1**

**Clydebank Housing Association – Child Protection and Vulnerable Adults Policy**

**Incident Report Form**

Name	Address
Date of Birth	Date and Time of Report

**Brief Description of Incident/Report:**  
**(Avoid opinions and conjecture. Record only what is disclosed)**

*Continue on a separate sheet if necessary (note date/time and attach to this sheet)*

Action Taken:

Persons informed:

Reported By: