



<b>HOUSING MANAGEMENT</b>
<b>CHILD PROTECTION POLICY</b>
<b>August 2024</b>
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## **1. Introduction**

This Policy is intended to represent the Association's philosophy and practice in relation to safeguarding the safety of children that we come into contact with during the course of carrying out our duties.

The Association considers it the duty of all those employed or involved with the organisation to prevent the physical, sexual or emotional abuse of all children with who they come into contact, including reporting any abuse discovered or suspected.

## **2. Definition of Child**

For the purposes of this policy:-

A child/young person means anyone under 16 years of age. This definition is also extends to young people between the ages of 16-18 if they are subject to a supervision requirement by a Children's Hearing.

## **3. Equal Opportunities/GDPR**

We are committed to the principles of equal opportunities and good practice.

We acknowledge the Scottish Social Housing Charter (2012): 1 Equalities, which states; "Every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services".

Accordingly, PHA promotes equal opportunities and will not discriminate between persons on grounds of gender or marital status, on racial grounds, or on grounds of disability, age, sexual orientation, language or social origin, or of other personal attributes, including beliefs or opinions, such as religious beliefs or political opinions.

PHA is committed to ensuring the secure and safe management of data held by them in relation to customers, staff and other individuals. PHA staff members have a responsibility to ensure compliance with the terms of the Data Protection Act 2018, which includes the General Data Protection Regulation (EU) 2016/679 (the GDPR) and PHA's Privacy Policy, and to manage individuals' data in accordance

with the procedures outlined in the policy and documentation referred to herein.

If you need any information to be in a different format/language please let us know - we may be able to help.

#### **4. Scottish Social Housing Charter and Legal Framework**

The Association in preparing this policy and any related procedures has given consideration to and sought compliance with;

Scottish Social Housing Charter, as defined by The Scottish Housing Regulator – the regulatory body for Housing Associations. The Relevant Charter Outcome Numbers 2,3,4,5,6 and 11 state:

2. Communication: Social landlords manage their business so that: “Tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the service it provides”

3.Participation: Social Landlords manage their business so that: “Tenants and other customers find it easy to participate in and influence their landlord’s decisions at a level they feel comfortable with”

6. Estate Management, anti-social behaviour, neighbour nuisance and tenancy disputes: Social Landlords working in partnership with other agencies, help to ensure as far as reasonably possible that: “Tenants and other customers live in well-maintained neighbourhoods where they feel safe”

11. Tenancy Sustainment, Social Landlords ensure that: “Tenants get the information they need on how to obtain support to remain in their home; and ensure suitable support is available, including services provided directly by the landlord and by other organisations”.

#### **Legal Framework**

Employees should familiarise themselves with the National Guidance for Child Protection Scotland 2021 (updated 2023) which can be accessed via the Scottish Government website. [Supporting](#)

documents - National Guidance for Child Protection in Scotland 2021  
- updated 2023 - gov.scot ([www.gov.scot](http://www.gov.scot))

This guidance highlights that child protection must be seen within the wider context of support families and meeting children's needs through 'Getting it Right for every Child' (GIFREC) Scottish Government.

### **5. Aims of the Policy**

The aim of this policy is to make all Paisley HA staff aware of their responsibilities for child protection under the Scottish Government's 'National Guidance for Child Protection in Scotland' which provides a national framework within which all agencies, organisations and services work together to safeguard and promote the welfare of children. It recognises that children and their families can come into contact with a range of services at different points for different reasons and with different and changing needs. All services, agencies and organisations have a responsibility to recognise and actively consider potential risks to a child, irrespective of whether the child is the main focus of their involvement.

Protecting children means recognising when to be concerned about their safety and understanding when and how to share these concerns.

### **6. Confidentiality**

Essential to a collaborative approach and the protection of children is the sharing of information and concerns. If there is reasonable concern that a child may be at risk of significant harm this will always override the professional agency requirements to keep information confidential (Scottish Executive 2004)

Generally, it is considered best practice to be open and honest with parents/ carers and where appropriate, children & young people, about our intention to share concerns about their situation, except in exceptional circumstances e.g. if it would put a child in danger. Where staff are in any doubt they should seek advice from their line manager.

## **7. Indicators of Risk**

Below are indicators of risk:

### **Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

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

### **Sexual Abuse**

Sexual abuse involves forcing or enticing a 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 or non-penetrative acts.

They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or in watching sexual activities, using sexual language towards a child or encouraging children to behave in sexually inappropriate ways.

### **Emotional Abuse**

Emotional abuse is where persistent emotional ill treatment of a child causes severe and persistent adverse effects on the 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 feature age or developmentally inappropriate expectations being imposed on children.

It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is present in all types of ill treatment of a child, though it may occur independently of the other forms of abuse.

## **Neglect**

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 carer 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.

## **Parental Substance Misuse**

Substance abuse can involve either alcohol or drug misuse (including the misuse of prescription as well as illegal drugs). Neglect, as detailed above, may occur due to substance misuse. Staff should be aware of the potential risks to children from substance abusing parents/ carers.

## **Children placing themselves at risk**

Some children place themselves at risk by displaying certain behaviours. While not exhaustive the following lists the different types of concern that may arise:

- Self-harm or suicide attempts
- Alcohol and /or drug misuse
- Running away/going missing
- Inappropriate sexual behaviour or relationships
- Sexual exploitation
- Problematic or harmful sexual behaviour
- Violent behaviour
- Criminal activity

## **Domestic Abuse**

Children and young people living with domestic abuse are at increased risk of significant harm, potentially as a result of direct abuse from the perpetrator as well as from witnessing harm to other members of the family. It is not necessary, however, for children to witness directly or be subject to abuse to be affected by it. Domestic abuse can profoundly disrupt a child's stable and nurturing environment and affect their physical, mental and emotional health.

## **Child Exploitation**

Child exploitation is a broad term which includes forced or dangerous labour, child trafficking & child prostitution. The term is used to refer to situations where children are abused physically, verbally or sexually or when they are submitted to unsatisfactory conditions as part of their forced or voluntary employment.

## **8. Responsibilities**

The Board is responsible for approving the policy.

The Head of Housing is responsible for reviewing the policy and for identifying suitable training for staff.

All staff have the responsibility for implementing the policy with line managers acting to provide guidance for staff prior to referrals being made to Social Work.

PHA staff regularly come into contact with children through:

- carrying out house visits to tenants/ housing applicants
- people visiting our office
- carrying out property & estates visits
- people attending public meetings/events

## **Recognising Abuse**

Dealing with child abuse is rarely straightforward and it isn't always easy to recognise a situation where abuse may occur or has already taken place. Staff are not expected to be experts but in their day-to-day contact with families they may come across situations where they are made aware of or have suspicions that a child may be at risk. These may include: -

- An allegation of a specific incident requiring further investigation.
- An allegation that a child is at risk.
- General concerns about a child's welfare.
- An accumulation of concerns that have been gathering over a period of time.



The following situations, while not exhaustive, highlight some examples where staff should be extra vigilant where there are children in the household:

- Child describes an abusive act involving him/her.
- Someone else expresses concerns about the welfare of a child e.g. a neighbour reporting that a child is being left alone for long periods, comes to their door hungry, parents under the influence of substances, drug dealing, anti-social behaviour.
- Suspicious injuries where the explanation seems unlikely.
- Inappropriate sexual awareness and or engaging in sexually explicit behaviour.
- Domestic violence within the home.
- Parent(s) regularly under the influence of substances.
- Home full of people under the influence of substances.
- Home conditions are poor e.g. no food, no hot water, unclean bedding, children unclean and unkempt, doors off hinges, parents not being available for repairs.
- Child continually at home instead of school.
- Child being verbally abused repeatedly by parent.

The above list is by no means exhaustive nor does the presence of one indicator mean a child is being abused. Where a staff member has concerns, they will discuss it with their line manager.

Non engagement with services could be the result of the family having other issues. Where there has been a period of non-engagement staff should highlight this to their line manager to determine how to gain access to the property and establish if there are any grounds for concern.

The Association has an increasing number of vulnerable tenants and families with mental health issues can be more vulnerable than others. Staff should be aware of this and if they have any concerns to highlight this to their line manager.

Staff should be aware of the household composition prior to visiting a tenant, particularly if there are pre-school children in the household.

Staff should pay attention to the condition of the house (is it a suitable environment for children) and be alert to whether child or the children are never present when visited or where there is no apparent evidence that a child or children live in the house. If staff have concerns about not seeing a child or children when they are normally there when they visit, then they should speak to their line manager.

If a member of staff suspects abuse or has received a report of abuse they will:

- Report it to their line manager immediately
- Refer any concerns over the abuse or neglect of a child to Social Services in the first instance and where appropriate, Police Scotland
- Record any discussions and actions carried out following suspected abuse or neglect accurately, thoroughly and promptly, including dates and times.
- Co-operate with any agencies involved with cases of alleged abuse or neglect
- Work with other agencies to investigate any alleged breach of tenancy agreement and act through policies and procedures where appropriate

Whilst adult client confidentiality guidelines should be adhered to, concerns regarding child protection will always override the confidentiality requirement in order to protect children and young people.

Information regarding the signs to look out for and the importance of reporting concerns can be found on the Child Protection Scotland website <https://www.childprotection.scot/>

Further information can be found on Renfrewshire Council's website <http://www.no-worries.org.uk/>

### **Referrals to Social Work**

If a staff member has concerns about a child he/she must without delay discuss this with their line manager.

After discussion/ agreement with their line manager, the staff member must then immediately report their concerns by telephone call to the duty social worker at the local area team, followed up on the same day, with a written referral. As the Association does not have secure email under no circumstances should a referral form be emailed to SW.

On receipt of the referral, Social Work will decide how to proceed.

As the referrer Social Work will send a written response outlining their action within 5 working days from receipt of the referral form.

A copy of the referral form and Social Work response should be given to The Housing Manager.

If we are unhappy or disagree with the Social Work Department decision, we should raise our concerns with their Head of Services. If no further action is agreed and further concerns emerge, a further referral should be made.

### **Recording of Information**

The Association is regulated by the Data Protection Act 2018. As such our customers can request access to the personal information we hold on them. It is the responsibility of our staff to ensure all written information is accurately recorded and reported in a suitable format for public scrutiny.

Any significant incidents or changes subsequent to a referral being made should be reported to Social Work who is the lead agency for child protection records.

### **Abandoned / Repossessed Tenancies**

If a tenancy is suspected of being abandoned and there are children in the household, staff, along with the usual enquiries should also consult with schools, health visitors, Social Work (if family known to have Social Work Support) where these details are known.

Where the property is repossessed at the end of the 28-day abandonment and there are children in the household, the staff member should notify Social Work where known to have SW involvement

Where we are raising legal action against a tenancy and there are children in the household the staff member raising the action will notify Social Work.

### **Photographs**

Children will not be photographed by any member of staff and/or Board member for whatever purpose unless written permission has been given by the child's parent or carer. Images will not be retained by the Association after they have been used for the purpose they have been taken for.

### **9. Staff Training**

We will ensure that all staff are aware of this policy and receive appropriate training.

Joint training with Renfrewshire Council/ Social Work will be carried out through partnership working.

### **10. Complaints**

Although we are committed to providing high levels of service, we accept that there may be occasions where customers may not be satisfied with the service received from us. We value all complaints and use this information to help us improve our services. Our complaints policy details our complaints procedure and how to make a complaint.

### **11. Policy Review**

This policy will be reviewed every 5 years or earlier if required to respond to a change in legislation or good practice.

## 12. Telephone Numbers/websites for services

- ChildLine                      0800 011 11
- NSPCC – Scotland            0808 800 5000
- Social Work                    0300 300 1199
- Social Work out of hours    0300 343 1505
- Police                            101 or 999 *in a case where there*
  - *an ongoing crime being committed*
  - *e.g.*
  - *assault*
- [www.no-worries.org.uk](http://www.no-worries.org.uk)