

# **Safeguarding Policy**

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Last Review: June 2025 Next Review: June 2028 Policy Number: H6

## **Our Vision, Our Values, Our Strategic Objectives**

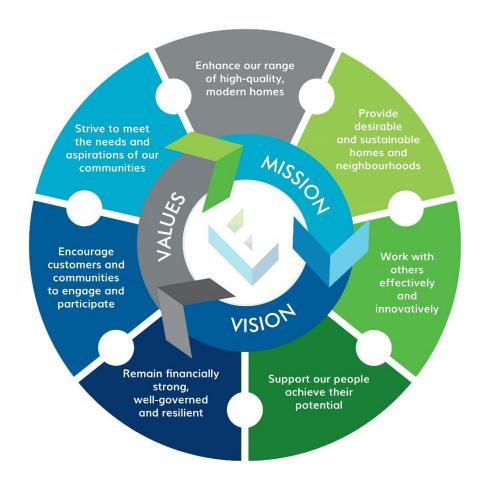
#### **Our Vision**

A vibrant neighbourhood where everyone can prosper.

#### **Our Values**

Caring, Reliable, Fair, Open and Adaptable

#### **Our Strategic Objectives**



#### **Equality and Diversity Statement**

Elderpark Housing are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

This document complies with our Equality and Diversity Policy.

We will regularly review this Policy and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Policy.

## **Executive Summary**

#### **Policy Author**

The Housing Manager has developed this policy on behalf of the organisation. It applies to all aspects of our responsibility for dealing with safeguarding tenants.

#### **Purpose of the Policy**

The Safeguarding Policy aims to ensure that all Elderpark Housing Association staff members know how to support vulnerable individuals and children, keep them safe from harm, and be able to respond appropriately to concerns.

#### Aims and Objectives of the Policy

The aims and objectives of the policy are:

- To give clear guidance on the process for dealing with safeguarding concerns
- To outline the process for dealing with safeguarding concerns
- To ensure that the process for dealing with issues of safeguarding is dealt with within the existing legal provisions, regulatory requirements and best practice guidance

#### **Legislative and Regulatory Compliance**

We will seek to meet all of our legal obligations as set out in the following legislation:

- The Adult Support and Protection (Scotland) Act 2007
- The Human Rights Act 1998
- The Date Protection (Scotland) Act 2018
- Adults with Incapacity (Scotland) Act 2000
- The Mental Health (Care and Treatment) (Scotland) Act 2015
- The Protection of Vulnerable Groups (Scotland) Act 2007
- The Sexual Offences (Scotland) Act 2009
- The Equality Act 2010
- Children (Scotland) Act 1995
- The Domestic Abuse (Scotland) Act 2018
- Housing (Scotland) Acts 2001 and 2014
- The Matrimonial Homes (Family Protection) (Scotland) Act 1981
- The Homelessness etc. (Scotland) Act 2003
- The Children Support Act 1991

In addition, we will meet the outcomes and standards contained within the Scottish Housing Regulator's Regulation Framework.

Outcome 1 Equalities - Social landlords perform all aspects of their housing services so
that 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.

- Outcome 2 Communication Social landlords manage their businesses 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 services it provides
- Outcome 11 Tenancy sustainment. 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
- Standard 2 -The landlord is open about and accountable for what is does. It
  understands and takes account of the needs and priorities of its tenants, service users
  and stakeholders. In addition, its primary focus us the sustainable achievement of
  these priorities.
- Standard 5 The RSL conducts its affairs with honesty and integrity

#### **Equalities**

Elderpark Housing will ensure there is a consistent approach in promoting equality and diversity across all areas and this policy will be administered in accordance with this policy.

#### **Privacy**

This document fully complies with General Data Protection Regulations (2018) and once approved will be published on our website to ensure transparency of how we will seek to ensure Equality and Diversity across everything we do.

#### **Related Policies**

Policy Title	Location
Equality & Diversity Policy	V:\Elderpark Policy Suite\Governance
	Policies\G13 Equality and Diversity
	Policy.pdf

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#### 1 Introduction

- 1.1 Elderpark Housing Association (EHA) is a registered social landlord, established in 1975. We have strived to improve the lives of our residents, create opportunities and build a safe and secure environment. The Association is a 'not for profit' organisation, registered and regulated by the Scottish Housing Regulator and is governed by a voluntary Management Committee of up to a maximum of 15 people who employ a team of staff to manage the Association on a day-to-day basis.
- 1.2 The Management Committee is responsible for approving this Policy, and for overseeing its implementation. The Chief Executive and Management Team have operational responsibility for policy implementation, and for reporting to the Management Committee on areas relevant to abandonments.

## **2** Purpose of Policy

- 2.1 The purpose of this policy and procedure is to ensure that all Elderpark Housing Association staff members know how to support vulnerable individuals and children, keep them safe from harm, and be able to respond appropriately to concerns and actions that may involve the abuse of individuals or families accessing the Association's services. Ensure that all sections are clear regarding their roles in tackling and responding to issues around any forms of abuse.
- 2.2 This policy is written in accordance with our Equality and Diversity Policy to ensure that tenants and residents in our community do not face discrimination, victimisation, harassment or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.
- 2.3 Elderpark Housing Association believes that individuals or families accessing services have the right to live their lives free from any form of abuse. The Association expects all employees to know what course of action to take if they observe or suspect abuse or if abuse is reported to them.

#### 3 Scope

3.1 This policy applies to all Elderpark Housing Association staff members, volunteers, and management committee members, where there are concerns about the potential or actual abuse of an individual who they come into contact with via the

Association's services or projects. This includes all circumstances where abuse may not have been intended but the outcome was abusive.

3.2 Elderpark Housing Association will ensure that the approach to safeguarding vulnerable adults and children takes into account the individual needs of the tenants and their households. Where required, appropriate arrangements will be made for communicating with the tenants.

#### 4 Accessibility

The Association's Customer Service Standards aim to ensure all of the service users receive an excellent standard of service. The Standards help define what customers can expect when contacting or engaging with staff members in the office. It is available on our website, directly from the office, or in other formats as required.

#### 5 Definitions

#### 5.1 Who is a vulnerable adult?

In this policy "adult" means a person aged sixteen years or over. The Adult Support and Protection Act 2007 gives greater protection to adults at risk of harm or neglect. The Act defines adults at risk as those aged 16 years and over who:

- are unable to safeguard their well-being, property, rights, or other interests
- and are at risk of harm
- And because they are affected by disability or mental health conditions, are more vulnerable to being harmed than adults who are not so affected.

This includes young people (aged 16-18 years old) where there is a need for consideration, particularly when a young person is deemed to be vulnerable due to their circumstances such as being looked after and accommodated in a care setting or being looked after at home or this could be a young person who is on a supervision order.

#### 5.2 Who is vulnerable child?

In this policy "child or children" means a person who is under the age of eighteen years old. Children (Scotland) Act 1995 is the cornerstone of child protection in Scotland, focussing on the needs of children and their families. The Act outlines the

duties and powers of local authorities in supporting children and families while the Child Support Act 1991 addresses child maintenance obligations. The welfare of children is also paramount, and the Act emphasises the importance of taking the child's view into account in decisions affecting their lives. Promoting an early intervention approach, with provisions for local authorities to support children and families facing difficulties.

### 5.3 What is meant by harm?

As per the Adult Support and Protection (Scotland) Act 2007, 'harm' includes all harmful conduct and, in particular, includes:

- conduct which causes physical harm;
- conduct that causes psychological harm (e.g. by causing fear, alarm, or distress);
- unlawful conduct that appropriates or adversely affects property, rights, or interests (e.g. theft, fraud, embezzlement, or extortion);
- · conduct which causes self-harm.
- As per the Children (Scotland) Act 1995, "harm" includes all harmful conduct and, in particular, includes:
- Physical abuse, neglect, emotional abuse, and sexual abuse,
- Conditions that negatively affect a child's physical well-being, including illness, injury, or inadequate care;
- Any conditions that negatively affect a child's physical, intellectual, emotional, social, or behavioural development;
- Witnessing or hearing the abuse of another person, such as domestic abuse;
- Impairment suffered from seeing or hearing the ill-treatment of another.

#### 5.4 Who may be the abuser?

Adults and children may be harmed or abused by a wide range of people, including relatives and family members, professional staff, paid care workers, volunteers, other service users, neighbours, friends and associates, and people who deliberately exploit vulnerable people and strangers.

There is often a particular concern when abuse is perpetrated by someone in a position of power or authority, who uses his or her position to the detriment of the health, safety, welfare, and general well-being of a vulnerable person.

Agencies not only have a responsibility to all vulnerable adults and children who have been abused but may also have responsibilities towards agencies/people with whom the perpetrator is employed or works as a volunteer.

The roles, powers, and duties of the various agencies, concerning the perpetrator, will vary depending on whether the latter is:

- A member of staff
- A member of a recognised professional group
- A volunteer or member of a community group such as a place of worship or social club
- A service user
- A spouse, a parent, a relative, or a member of the person's social network
- A paid care worker or carer
- A neighbour, member of the public, or stranger
- A person who deliberately targets vulnerable people to exploit them

## 6 Principles

Elderpark Housing Association adopts the following principles to tackle all forms of abuse:

- Provide the uttermost consideration to the welfare of individuals or families supported by services or projects to keep them safe from harm
- Act to safeguard the right of every person to have safety and adequate physical, emotional, and social support
- Require every staff member who suspects or has evidence that a
- a person is suffering or is likely to suffer harm, to report the matter to their
   Line Manager
- Require repair contractors to report any indications of abuse or harm to a member of the Customer Service or Asset Management Team
- Take whatever steps are necessary to protect the person and such action will take priority over all other work
- Work within the guidelines issued by and give every assistance to Local Authority Social Work Services and all other agencies on matters of abuse
- Work with all relevant agencies to develop and maintain a shared understanding of aims, objectives, and standards of practice

- Recognise the right of every person using a service to have their needs understood and their views taken into account and an individual approach taken when planning for their future welfare
- Ensure that when the right to an independent lifestyle and choice is at risk
  the individual concerned receives appropriate help, including advice,
  protection, and support from relevant agencies e.g. independent advocacy
- Actively work within ethical principles to provide services that promote: dignity, privacy, choice, safety, realizing potential, equality, and diversity

#### 7 Standards

The following standards are expected to ensure the protection, welfare, and safety of all individuals using our service all staff and service users have access to this policy.

- all services must have a clear understanding of the relevant Glasgow City
   Council adult protection guidelines (see
  - https://www.glasgow.gov.uk/article/3825/Information-for-adults-and-their-representatives-and-families
- Staff clearly understand the circumstances which would justify the involvement of the police or any other external agency
- Reporting and recording of incidents is prompt, accurate, and impartial and follows the procedures contained within this policy
- Staff must be aware of the types of abuse and the signs of
- potential abuse
- Staff should be aware of the good practice standards

Staff will promote and encourage the independence of service users while protecting them as far as possible from danger or harm. This includes:

- Promoting the independence of service users and assisting them to understand and exercise their rights
- Using established processes and procedures to challenge and report dangerous, abusive, discriminatory, or exploitative behaviour and practice.
- Following practice and procedures designed to keep staff, customers, and other people safe from violent and abusive behaviour at work

- Informing your line manager (or a senior leader if more appropriate) where the practice of colleagues may be unsafe or adversely affecting standards
- Assisting service users and carers to make complaints, taking complaints seriously, and responding to them or passing them to the appropriate person
- Recognising and using responsibly the power that comes from your work appropriate with service users and carers

#### 8 Implementation

#### 8.1 Recognition and Response to Abuse

All harm and abuse are serious, and need to be recognised, and an appropriate response made.

The Association recognises that there are many forms of abuse, including emotional, financial, misuse of medication, neglect, physical, racial, sexual, verbal, etc.

The following, though not exhaustive, list several types of abuse:

#### **Neglect and Acts on Omission**

- Abandonment
- Deprivation of basic needs: water, food, housing, heat, clothing or medical care
- Failure to provide access to appropriate health, social care, or educational services

#### **Physical Abuse**

- Hitting
- Pushing
- Causing unnecessary pain
- Intentional misuse of medication
- Causing injury
- Unauthorised restraint

#### **Sexual Abuse**

- Inappropriate exposure to pornographic material
- Inappropriate sexual advances

- Inappropriate sexual contact
- Sexual Exploitation
- Rape

#### **Emotional or Verbal Abuse**

- Humiliation
- Name-calling
- Threats of harm or abandonment
- Isolation
- Non-Communication
- Intimidation

#### **Financial Abuse or Misuse of Material Responses**

- Pressure to sign or hand over property or money
- Misuse of property, possessions, or welfare benefits
- Theft, fraud, or embezzlement
- Undue influence to change legal documents
- Pressure to sign or hand over property or money

#### **Institutional Abuse**

- Not being treated as an individual
- Routines of regimes that fail to recognise service user's individuality
- Being restrained physically or through medication
- Derogatory nicknames
- Taking away independence
- Disrespect for private space

#### **Information Abuse**

- Denial of information/advice
- Failure to provide adequate or accurate information
- Being misinformed

#### **Cyber Abuse**

Behaving in a bullying or threatening manner using the following

- Email
- Social networking
- Mobile phone
- Interactive gaming

Any or all of these types of abuse may be perpetrated as the result of deliberate intent, negligence, or ignorance.

In all cases of abuse, it is important to alert your line manager or allow them to engage in discussion and decision-making.

Abuse which is a criminal offence must be addressed appropriately with other agencies, including the Police Scotland if necessary.

#### 8.2 Signs and Symptoms

This section is included as a basis for understanding the nature of abuse and to assist staff in appreciating the issues that will be considered by the Local Authority. They are not a definitive guide to the recognition of abuse but more a guide to how awareness should be triggered, i.e. indications, to prompt thinking about action.

The descriptions of abuse that follow, signify that abuse covers not only acts of commission of violence but also acts of omission on the part of the carers. Abuse can be both active and passive. When accidents are reported, consideration should be given as to whether the person was deliberately or consciously put in the way of danger.

#### 8.3 Recognition of Abuse

Many of the symptoms in the following lists might have an alternative cause, other than abuse, but they should lead any professional person to at least consider whether the person has been abused. Suspicions of adult abuse or neglect can come to light in several ways. The clearest indicator is a statement or comment by the adults themselves, by their regular carer, or by others disclosing or suggesting abuse or neglect.

Such statements invariably warrant further action, whether they relate to a specific incident, a pattern of events, or a more general situation.

There are many other factors which may indicate abuse or neglect. Indicators that could give rise to suspicion include:

#### **Physical Neglect**

Weight – significant loss, failure to maintain weight

- Loss of skin 'bloom' plus chronic dirt; smell; patchy baldness; poor hair texture
- Where incontinence pads are used, severe rash is caused by failure to care
- Skin sore with infected areas
- Inadequate or inappropriately poor clothing
- Smell: chronic stale smell often associated with urinary incontinence
- Scavenging or stealing food
- Sudden increase in confusion e.g. dehydration produces toxic confusion

#### **Emotional Neglect**

- Silent, watchful, frozen awareness
- Head rocking or banging
- Slowness of response to stimulation
- Poor interaction
- Weight loss

#### **Physical Abuse**

Any bruise, which does not have an adequate explanation, especially:

- Small circular bruise to the facial area, the distribution of which indicated firm gripping of the cheeks with an adult hand
- Bruising to the lips and gums
- Torn fraenulum (on the underside of the tongue) particularly important with people who cannot feed independently
- Bruising to cheeks, ears, and forehead caused by finger marks
- Bruising to any limb that foes all the way around

Special attention should be taken to any bruising which is obviously of differing ages.

#### Other skin marks, in particular burns or bites:

With any burn or scald, special attention should be paid to the history as to whether the explanation is plausible.

More severe injuries, especially fractures, should always be taken as an indication of abuse unless there is clear evidence that the injury has resulted from an accident.

- Neglected injuries: lacerations, abrasions
- Bruises resulting from the clenched fist or the use of a weapon
- Burns and scalds, including assault with a cigarette
- Lack of hygiene and clothing

- Diseases not rarely seen due to lack of nutrition, e.g. scurvy, and rickets (note that within ethnic minority families, this could be the innocent result of a diet)
- Unusual or unexplained behaviour of care including a delay in seeking advice, dubious or inconsistent explanation of injuries, and bruising
- A prolonged interval between illness/injury and presentation for medical care

#### **Sexual Abuse**

- Difficulty in sitting still
- Over-displaying sexualise behaviour or verbalisation
- Sleep disturbance
- Other signs (non-specific physical complaints):
- Under-eating, weight loss
- Overeating, obesity
- Excessive preoccupation with sexual matters
- Frequent genital touching
- Re-enactment of the abuse with friends
- Drinking, sometimes leading to intoxication
- Overdose
- Deliberate self-harm
- Depression
- Physical signs are rare unless aggressive rape has occurred but be alert to signs of bruising on the upper arms and thighs.
- Involvement with pornography, paedophilia
- Sexually explicit art/drawings
- Sexually transmitted disease or pregnancy in someone unable to give consent
- 'New' sexual words acquired without an alternative explanation, e.g. a sexeducation course
- Sudden fear or marked dislike of a particular man/woman

#### **Emotional Abuse**

- Behavioural disorders
- Temper tantrums
- Prolonged crying
- Petty theft
- Telling untruths
- Lack of co-operation
- Running away
- Disruptive, aggressive behaviour

- Poor feeding habits too much, too little
- Lethargy and depression
- Tiredness
- Loss of appetite
- Lack vitality

#### Consider abuse as a possibility if there are signs of stress such as:

- Return to earlier behaviours such as bed-wetting and soiling
- Mood swing
- Withdrawal
- An onset of or an increase in difficult behaviour
- Crying

#### **Financial Abuse**

- A change in the ability of a service user to pay for goods/services
- Unexplained debt
- Reduction in assets
- Sudden unexplained lack of funds/withdrawal of money from accounts
- Unusual interest in another's finances
- Unexplained disappearance of possessions

#### **Institutional Abuse**

- Shared bedrooms
- Shared clothing and linen
- No respect for dignity and privacy
- Medication given and withdrawn as punishment

#### Misuse of Medication

- Not administered as prescribed.
- Over-medication results in apathy, drowsiness, slurring of speech, lack of sleep, continual pain, etc.
- Using medication to control or reward

#### Other, Considerations

• Over-frequent or inappropriate contact/referral to outside agencies

- Demonstration of fear by the service user to another person/also a demonstration of fear of going home
- Difficulty in speaking to service users, e.g. another adult unreasonably insists on being present
- Pressure exerted by families or professionals to have someone committed to care
- Staff with a history of moving jobs without notice or inadequate references

#### 9 Roles and Responsibilities

Several responsibilities are common to all staff and volunteers within Elderpark Housing Association irrespective of their function within individual services and the wider Association. These are:

- Ensure they are aware of the importance of the Safeguarding Policy
- (Vulnerable Adults) good practice guidelines
- ensure that they are aware of the types of abuse
- ensure that they are aware of the signs of potential abuse
- ensure that they know how to respond quickly and appropriately if abuse is suspected, witnessed, or reported
- ensure that the environment is safe and secure and enables service users to confide in staff
- ensure that staff are aware of the Whistleblowing Policy
- ensure that they are clear of the good practice standards of conduct
- ensure the implementation of this policy
- ensure that they are aware of local authority reporting procedures

All Elderpark Housing Association services users, staff, volunteers, and management committee members will:

- respond appropriately to disclosures of and incidents of abuse
- record the incident on the Concerns Incident Form
- seek guidance from their line manager or senior manager if more appropriate

#### 10 Measuring and Monitoring Reports of Safeguarding

Each departmental manager and director is responsible for ensuring that this policy is implemented as required. They will undertake regular reviews of any safeguarding issues that have been identified and in particular, they will:

- Support and advise staff in dealing with all incidents or concerns relating to abuse
- Ensure that staff are trained in the recognition, prevention, and reporting of abuse
- Arrange specialist training where appropriate
- Ensure that staff are aware of the procedures to follow in the event of abuse being witnessed, reported, or suspected.
- Require that all staff who suspect or have evidence that a service user is suffering, or is likely to suffer harm, report the matter to a line manager.
- Ensure that staff are aware of the good practice standards expected by the Association.
- Ensure suitably qualified and competent staff in appropriate numbers are deployed to ensure the welfare and safety of service users.

#### 11 Complaints

Our complaint handling procedure was established by the Scottish Public Services Ombudsman (SPSO).

Following housing law, we provide our tenants with thorough information about our complaint-handling process. Moreover, advice is given to all service users on their right to complain.

A complaint is defined as: "An expression of dissatisfaction by one or more members of the public about the housing association's action or lack of action, or about the standard of service provided by or on behalf of the housing association".

Elderpark Housing Association's handling process includes explicit reference to customer complaints relating to equality issues. In addition, the Association has a regulatory requirement to provide information to the Scottish Housing Regulator on the number of customer complaints the Association receives that relate to equality issues in the Annual Return on the Charter.

## 12 Review of Policy

This policy will be reviewed within 3 years from the date of approval by the Management Committee, following Elderpark Housing Association's policy review framework and approval process

## **GDPR Impact Assessment**

Name of Policy to be assessed	Safeguarding Policy	New policy or revision of existing?	New Policy
Person(s) responsible for assessment		Rachel Cooper	
Briefly describe the aims, objectives and purpose of the policy.	<ul> <li>The aims, objectives and purpose of the policy is to:</li> <li>To identify and protect adults and children at risk from harm.</li> <li>To ensure all Elderpark Housing Association staff members, volunteers, and committee members know how to support vulnerable individuals to keep them safe from harm and respond appropriately to concerns and actions that may involve the abuse of individuals or families accessing our service.</li> </ul>		
Which type of data will be used by implementation of this policy? (e.g. personal, sensitive or special category)	Personal and potentially sensitive information will be used by implementation of this policy.		
What outcomes are wanted from this policy? (e.g. necessary to meet legal obligations)	<ul> <li>To give clear guidance to staff when dealing with vulnerable tenants and children.</li> <li>To ensure that any actions taken are dealt with within the existing legal provisions, regulatory requirements and best practice guidance</li> <li>To have effective engagement with the appropriate external enforcement and support agencies</li> <li>To ensure that any actions taken are dealt with in accordance with our equality and diversity policy</li> </ul>		
Which groups could be affected by the policy? (note all that apply)			
Tenants	X	Committee	X
Employees	Х	Contractors	Х
If the policy is not relevant to any of the data groups listed above, state why and end the process here.			ny and end the
Have those affected by the	oolicy / decision been in	nvolved?	

Tenants will be made aware that the association is adopting a safeguarding policy. There is no requirement for consultations

Describe the likely positive or negative impact(s)	Positive Impact(s)	Negative Impact(s)
that the policy could have on the groups identified		
above.		
	None	None
What actions are required to address the impacts	The Association has systems and checks	
arising from this assessment? (This might include:	in place to ensure that personal data	
additional data, putting monitoring in place,	remains confidential.	
making adjustments, taking specific action to	Information will be shared with work	
mitigate any potentially negative impacts)	colleagues on a stric	tly 'need to know'
	basis.	

Signed:	Rachel Cooper
Dated:	07.05.2025

## **Equality Impact Assessment**

Name of Policy to be assessed	Abandonment	New policy or	Revision of Policy
Person(s) responsible for as	 sessment	revision of existing? Housing Manager	
1. Briefly describe the aims, objectives and purpose of the policy.	The abandonment policy aims to ensure that EHA has an accountable process to identify, record and put in place procedures to deal with abandoned properties.		
2. Who is intended to benefit from the policy? (e.g applicants, tenants, staff, contractors)	It applies to all tenants and staff that are responsible for implementing policy and procedures for abandoned properties		
3. What outcomes are wanted from this policy? (e.g the measurable changes or benefits to members/ tenants / staff)	<ul> <li>To give clear guidance on the process for dealing with tenants that have abandoned their properties</li> <li>To ensure that any actions taken are dealt with within the existing legal provisions, regulatory requirements and best practice guidance</li> <li>To have effective engagement with the appropriate external enforcement and support agencies</li> <li>To ensure that any actions taken are dealt with in accordance with our equality and diversity policy</li> <li>To advise tenants who's properties has been terminated through the abandonment of the appeal process</li> </ul>		
4. Which groups could be af	fected by the policy? (n	ote all that apply)	
Age	Х	Disability	х
Gender reassignment	х	Marriage and Civil Partnership	х
Pregnancy and Maternity	x	Race	х
Religion or Belief	х	Sex	x
Sexual Orientation	х		
5. If the policy is not relevant to any of the equality groups listed above, state why and end the process here.			

## 6. Have those affected by the policy / decision been involved?

Tenants will be provided with details on how the association deals with abandoned properties if they request information and information will be made available on our website.

7. Describe the likely positive or negative	Positive Impact(s)	Negative Impact(s)
impact(s) that the policy could have on the groups identified above.	None	none
8. What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)	N/A	

Signed:	Rachel Cooper
Dated:	06.02.2025