

POLICY TITLE		Adult Safeguarding Policy (Adults at Risk or in Need of Protection)		CCG-AS-P11	
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Policy to be followed by		This policy applies to all staff in Residential and Day Services, members of the Management Committee, carers and advocates who act on behalf of the organisation and who come directly into contact with Adult residents.			
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1. Policy Statement

Camphill Community Glencraig provides Residential and Day Services for adults with learning disability. There is also an Independent School and a Registered Children's Home on site.

This policy outlines the actions needed in response to adults at risk of abuse or harm. For the purpose of this policy, safeguarding processes will apply to both 'Adults at Risk of Harm' and 'Adults in Need of Protection'.

We recognise that promoting the welfare of all adults and safeguarding them from harm is paramount to all our practices.

Camphill Community Glencraig affirms that all adults have the right to be protected from harm and abuse. It requires that all staff will take the necessary steps and appropriate measures to ensure that abuse does not occur and will respond to all cases of suspected or alleged abuse of adults at risk with whom it comes into contact whether the source is a member of staff, a relative or any other person.

We are committed to multi-agency collaboration in safeguarding the welfare of all adults and will continuously review our protocols with placing Agencies in the interest of best practice.

Camphill Community Glencraig is committed to upholding the rights of all adults, balancing civil liberties with care and protection and always acting in the best interests of all adults and with their consent.

We are committed to creating and maintaining an environment which aims to ensure, as far as possible, that adults who take part in activities or avail of the organisation's services are kept free from abuse and exploitation.

Adult Rights

The rights of adults at risk to live a life free from neglect, exploitation and abuse are protected by The Human Rights Act 1998 – their right to life is protected (under Article 2); their right to be protected from inhuman and degrading treatment (under Article 3); and their right to liberty and security (under Article 5).

Camphill Community Glencraig will:

- Promote zero-tolerance of harm, exploitation or neglect.
- The staff (employed and volunteers) are committed to practice which promotes the welfare of the people who live here and recognises every adult's right to respect and dignity, honesty, humanity and compassion in every aspect of their life.
- Prevent and reduce the risk of harm to adults, while supporting people's right to maintain control over their lives and make informed choices free from coercion.
- Introduce a range of preventative measures to promote an individual's capacity to keep themselves safe and to prevent harm occurring.
- Establish clear guidance for reporting concerns that an adult is, or may be, at risk of being harmed or in need of protection and how these will be responded to.
- Promote a continuous learning approach to adult safeguarding.

- Offer staff appropriate safeguarding training and support. This training will be updated in line with best practice.
- Carefully follow the procedures laid down for the recruitment and selection of staff.
- Providing effective management for staff through supervision, support and training as per organisational policy and regulations.
- Ensure that general safety and risk management procedures are adhered to.
- Implement and follow a code of behaviour.


All staff will safeguard adults who may be at risk by:

- Recognising that adult harm is wrong and that it should not be tolerated.
- Being aware of the signs of harm from abuse, exploitation and neglect.
- Reducing opportunities for harm from abuse, exploitation and neglect to occur.
- Knowing how and when to report safeguarding concerns to Line Managers, Safeguarding Champions, Trusts or PSNI as required by their role within the organisation.

2. Key Policy Principles

Camphill Community Glenraig supports and promotes safeguarding principles as outlined in the working regional policy document produced by the Department of Health, Social Services and Public Services in conjunction with the Department of Justice '*Adult Safeguarding: Prevention and Protection in Partnership July 2015*' that applies across Northern Ireland and has specific relevance to Camphill Community Glenraig and other service providers. To ensure that the highest standards of care, welfare and safety are maintained at all times within Camphill Community, Glenraig, all staff are required to understand and to adhere to the following principles:

1. **A rights-based approach** – Camphill Community Glenraig will protect the rights of adults at risk and in need of protection through effective recording, reporting, prevention and protection systems. Camphill Community Glenraig will promote and respect the rights of adults at risk and in need of protection to be safe and secure; to freedom from harm and coercion; to equality of treatment; to the protection of the law; to privacy; to confidentiality, and freedom from discrimination.
2. **An empowering approach** – Camphill Community Glenraig promotes an approach to ensure that all adults at risk and in need of protection are empowered to make informed choices about their lives; to maximise their opportunities to participate in the wider society; to keep themselves safe and free from harm and enabled to manage their own decisions in respect of exposure to risk.
3. **A person-centred approach** – Camphill Community Glenraig will ensure that it promotes and facilitates full participation of residents in all decisions affecting their lives taking full account of their views, wishes and feelings and, where necessary, their views of others who have an interest in his or her safety and well-being.
4. **A consent-driven approach** – Camphill Community Glenraig acknowledges that consideration of consent is central to adult safeguarding. A consent driven approach will involve a presumption that the adult at the centre of a safeguarding decision or




action is able to give or withhold consent unless it is established otherwise. Acknowledgement that an adult who lacks capacity to make a decision cannot give consent but that he or she should still be involved in decision-making as far as possible and given appropriate support.

5. **A collaborative approach** – Camphill Community Glencraig supports a collaborative approach, acknowledging that adult safeguarding will be most effective when it has the full support of the wider public and of safeguarding partners across the statutory, voluntary, community and independent sectors working together and is delivered in a way where roles and responsibilities and lines of accountabilities are clearly defined and understood, working in partnership and person centred approaches.

3. Aims of Camphill Community Glencraig

- Camphill Community Glencraig aims to create an environment where all adults and young adults feel safe, respected and where any suspicion of abuse or disclosures are dealt with promptly and appropriately.
- Camphill Community Glencraig is committed to ensuring that all adults have the opportunity to gain new skills and develop their independence in a safe and supportive environment, where personal dignity of each adult will be recognised and upheld at all times.
- All adults in need of safeguarding will be treated equally and their background and their culture will be valued and respected.
- All adults in need of safeguarding will know that information about them is managed appropriately and that there is a clear understanding of confidentiality amongst all staff.
- All adults in need of safeguarding will be supported and empowered to make informed choices about their lives, maximising their opportunities to participate in the wider society, they will be supported to keep safe and free from harm and enabled to make decisions in respect of exposure to risk.
- All adults will be supported to report any form of abuse and to receive appropriate support following abuse for as long as required.
- Human Rights of all adults will be central to any decision making and all decisions will be documented.
- Camphill Community Glencraig promotes a collaborative approach with other agencies and partners across the statutory, voluntary, community and independent sector, promoting person-centred care and holistic approaches in safeguarding all adults in an effective and transparent way, establishing clear guidance for reporting concerns and how these will be responded to.
- Camphill Community Glencraig will ensure all staff working with adults in need of safeguarding are provided with sufficient and appropriate training, continuing



support, supervision and appraisals in accordance with minimum standards and relevant regulations.

- Camphill Community Glenraig will ensure that the organisation follows all correct recruitment and selection procedures and necessary pre-employment checks in partnership with other agencies.

4. Definitions

4.1 Safeguarding

Camphill Community Glenraig is committed to a practice, which complies with the relevant Legislation in place to protect all adults who are unable to safeguard their own interests from harm.

Safeguarding is everyone's responsibility. Safeguarding means protecting an adult's right to live in safety, free from harm, abuse and exploitation regardless of age, gender, religion or ethnicity. It is vital that all adults at risk and in need of protection feel safe and protected at all times. Adults in need of safeguarding and protection may be those suffering 'harm' and also 'at risk of harm'.

Safeguarding is a broad continuum of activity which prevents harm from occurring and activity which protects adults at risk and in need of protection at risk where harm has occurred.

It ranges from the empowerment and strengthening of communities, through prevention and early intervention, to risk assessment and management, including investigation and protective intervention.

At all stages along this continuum, safeguarding interventions will aim to provide appropriate information, supportive responses and services which become increasingly more targeted and specialist as the risk of harm increases.


4.2 Harm

The regional policy defines harm as the impact on the victim of abuse, exploitation or neglect. It is the result of any action whether by commission or omission, deliberate, or as the result of a lack of knowledge or awareness which may result in the impairment of physical, intellectual, emotional, or mental health or wellbeing.

4.3 Adult at Risk of Harm

An 'adult at risk of harm' is a person aged 18 and over whose exposure to harm through abuse, exploitation or neglect MAY be increased by their personal characteristics and/or life circumstances. Personal characteristics may include, but are not limited to, age, disability, special educational needs, illness, mental or physical frailty or impairment of, or disturbance in, the functioning of the mind or brain. Life circumstances may include, but are not limited to, isolation, socio-economic factors and environmental living conditions.

4.4 Adult in Need of Protection



An 'adult in need of protection' is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their:

a) Personal characteristics

AND / OR

b) Life circumstances

AND

c) Who is unable to protect their own wellbeing, property, assets, rights or other interests

AND

d) Where the action or inaction of another person or persons is causing, or is likely to cause, him / her to be harmed.

In order to meet the definition of an adult in need of protection, either (a) or (b) must be present, in addition to both elements (c) and (d).

(Adult Safeguarding: Prevention and Protection in Partnership, 2015, p.11)

4.5 Definitions of Abuse

Is defined as 'a single or repeated act, or lack of appropriate action, occurring within any relationship where there is expectation of trust, which causes harm or distress to another individual or violates their human or civil right'.

Abuse is the misuse of power and control that one person has over another. It can involve direct and indirect contact and can include online abuse.

4.5.1 Physical Abuse

Physical abuse is the use of physical force or mistreatment of one person by another which may or may not result in actual physical injury. This may include hitting, pushing, rough handling, exposure to heat or cold, force feeding, improper administration of medication, poor use of moving & handling techniques, denial of treatment, misuse or illegal use of restraint and deprivation of liberty. Physical abuse may also cause psychological harm.

4.5.2 Psychological / Emotional Abuse

Psychological Abuse is a behaviour that is psychologically harmful or inflicts mental distress by threat, humiliation or other verbal/non-verbal conduct. This may include threats, humiliation or ridicule, provoking fear of violence, shouting, yelling and swearing, blaming and controlling, intimidation and coercion.

4.5.3 Sexual Abuse

Sexual abuse is any behaviour (psychological, physical, verbal, virtual/online) perceived to be of a sexual nature which is controlling, coercive, exploitative, harmful, or unwanted that is inflicted on anyone (irrespective of age, ethnicity, religion, gender, gender identity, sexual orientation or any form of disability). Sexual violence and abuse can take many forms and may include non-contact sexual activities.

4.5.4 Financial / Material Abuse

Financial abuse is borrowing money or property, withholding money or possessions from a resident, inappropriate handling of a resident's money or possessions.

4.5.5 Neglect

Neglect occurs when a person deliberately withholds, or fails to provide, appropriate and adequate care and support which is required by another adult. It may be through a lack of knowledge or awareness, or through a failure to take a reasonable action given the information and facts available to them at the time.

4.5.6 Institutional / Organisational Abuse

Institutional abuse may occur when the routines, systems and regimes result in poor standards of care, poor practice and behaviours, inflexible regimes and rigid routines which violate the dignity and human rights of the adults and place them at risk of harm. Institutional abuse may occur within a culture that denies, restricts or curtails privacy, dignity, choice and independence. It involves the collective failure of a service provider or an organisation to provide safe and appropriate services and includes a failure to ensure that the necessary preventative and / or protective measures are in place.


4.5.7 Exploitation

Exploitation is the deliberate maltreatment, manipulation or abuse of power and control over another person; to take advantage of another person or situation usually, but not always, for personal gain from using them as a commodity.

4.6. Behaviour Management, Sanctions and Restraint, Deprivation of Liberty:

The inappropriate use of sanctions and/or restrictive physical intervention constituting of deprivation of liberty may cause harm to an adult and could give rise to criminal charges, action under civil law or prosecution under the Mental Capacity Act (NI) 2016 and Health and Safety legislation. It also contravenes Human Rights. Camphill Community Glenraig will therefore ensure that Deprivation of Liberty Safeguards are embedded in practice and any behaviour management interventions will be agreed and signed off by the multi-disciplinary team. Staff will be trained in the use of Positive Behavioural Support Strategies (PBS) and Crisis Prevention & Intervention (CPI MAPA®), and act in line with the BILD code of Practice 2010.

The term MAPA® describes the full CPI curriculum and is divided into two distinct programmes : Verbal Intervention™ involves all the CPI preventative approaches and Safety Intervention™ involves all the CPI preventative interventions The use of restrictive physical intervention must be minimal and guided by fully documented risk assessments and preventative strategies including a signed off Care Plan.



Any restrictive physical intervention should always be designed to achieve outcomes that reflect the best interest of the adult and must be agreed and signed off by multi-disciplinary team.

The above is not an exhaustive list. Appendix 1 contains an overview of recognising the signs of abuse, further training is included in the staff induction.

5. Adult Safeguarding Procedure (What to do if you have a Safeguarding Concern)

5.1 Confidentiality

All information relating to an Adult is confidential and shared on a need to know basis only. Any information relating to a concern, disclosure or allegation should not be discussed either inside or outside Camphill Community Glencraig other than with those who need to know.

5.2 Recognising Adult Safeguarding Concerns

Knowing what to look out for and being alert plays a major role in ensuring that adults are safeguarded. It is important that all concerns about a possible abuse are taken seriously and appropriate action is taken.

All staff have the responsibility to report any suspected abuse. Failure to do so is in itself a form of abuse.

There are different ways that you could become aware that an adult may be suffering harm:

An adult may tell you

Someone else may share concerns

There may be signs of unexplained injury

There may be changes in behaviour

The behaviour of another may give rise to concern

You may be concerned about the safe practices of another staff or volunteer

5.3 What to do if an adult makes an allegation or discloses abuse

All staff must be aware of what to do in the event that an Adult at Risk makes a disclosure to them.

DO:

- Stay Calm, Listen and Hear.
- Express concern and acknowledge what has been said.
- If urgent medical help is required contact the Emergency Services (999).
- Reassure the person – They did the right thing in telling you.
- Let the person know that the information will be taken seriously.
- Let the person know what is going to happen next (Reporting).
- **Ensure the immediate safety of the person** and any other adults at risk and in need of protection or children.
- Be aware that medical and/or forensic evidence might be needed.
- **Report immediately** to the Registered Manager/Appointed Safeguarding Champion (ASC) or Deputy Registered Manager/Appointed person without delay. When an

incident occurs out of office-hours you must report to the Safeguarding On-Call team without a delay as per rota.

- Record the disclosure or what you witnessed as soon as possible.
- Reassure the person.
- Follow the procedure “What to do if you believe an adult is at risk or in need of protection”

DO NOT:

- Stop someone from disclosing to you.
- Promise to keep secrets.
- Press them for more detail or question them on detail, asking them to repeat the story.
- Contact, inform or interview the alleged perpetrator.
- Attempt to investigate yourself.
- Delay in carrying out the correct actions.
- Leave your concerns on a voicemail or email.
- Leave the person at risk of further harm.
- Gossip or share the information with others who do not need to know
- Do nothing

5.4 What to do if you believe an adult is at risk or in need of protection”

If any member of staff has a reason to believe that a person we support is experiencing harm, exploitation or neglect or is at risk of that occurring, they must follow the steps outlined below.

- Report immediately to the Registered Manager/ Adult Safeguarding Champion (ASC) or Deputy Registered Manager/Appointed person or Duty Manager
- This will be followed by a written ‘Incident Report Form’ as per ‘Accident, Incident and Near Miss Policy & Procedure’ asap. **Noting a Safeguarding Concern**
- Where the incident occurs out of office - hours you must inform the **Safeguarding On-Call team** without delay as per monthly rota.
- If necessary, ensure the **safety** of the adult and seek medical advice.
- There may be emergency situations where it is appropriate to contact the Regional Emergency Social Worker Service or PSNI immediately.
- The Registered Manager /ASC or Appointed person will ensure that the Adult is in no immediate danger and that any medical or police assistance required has been sought.
- The Registered Manager/ASC or the Appointed person will liaise with Adult Social Service Gateway Team if required, seeking advice from a Trust Designated Adult Protection Officer (DAPO) without delay.

- If staff or volunteer considers the Manager to be involved or unwilling to take the correct action they should:
- Report directly to the Head of Social Care or CEO (They will notify the Responsible Person)
- Seek support from the local Adult Support and Protection Services or the Police.

6. Safeguarding On - Call Team (Out of Office Hours)

Camphill Community Glencairg **Safeguarding On-Call Team** provides support during out of office-hours by the Appointed and appropriately trained staff, ensuring that the organisation has an available Safeguarding Support 24 hours a day, 7 days a week and is operating as per Safeguarding On-Call rota available to all staff within the organisation.

The Safeguarding On-Call Team are to be contacted when:

- Significant incidences occur which fall outside of the standard care planning processes.
- An incident necessitating the use of a restrictive practice not already approved in the care plans/risk assessment.
- In the case of significant injury /illness to resident, staff or volunteers (including hospital admissions).
- A missing person.
- A complaint or allegation pertaining to abuse or neglect of a resident.
- Need for Emergency Services
- A death.

7. Staff and Organisational Responsibilities

- All staff must recognise the need to maintain clear and professional boundaries between themselves and the residents. These boundaries define the limits of behaviour which allow staff and residents to engage safely in a therapeutic relationship. The boundaries are based on trust, respect and appropriate use of power, with the focus on the needs of the resident. Blurring of these boundaries and moving the focus of care away from the resident's needs can lead to confusion and the possibility of the development of harm. Private exclusive relationships with Adults in our care is never acceptable.
- The Manager will foster an atmosphere where staff feel able to discuss stressful or disturbing situations and seek advice, without feeling threatened or inadequate in accordance with the Organisation Whistleblowing procedures. Systems of support will be put in place to give staff the opportunity to air grievances, discuss difficulties and gain support in working in stressful situations.
- Fear of the consequences can often be a barrier to reporting of suspicions of harm. All staff can be reassured that their jobs will not be at risk if they alert Managers to harmful behaviour, or the risk of harmful behaviour, to a resident or residents by a member of staff, another resident, relative or visitor.
- The Registered Provider / Responsible Person has responsibility to monitor the implementation of the policy within the Organisation, supervising any investigations into abuse if permitted and has the responsibility of authorising if a member of staff or a volunteer is suspended pending investigation.

8. The Adult Safeguarding Champion (ASC)

Adult Safeguarding: Prevention and Protection in Partnership (2015) sets out the requirement for organisations to have Adult Safeguarding Champion (ASC). The ASC should hold a senior position within the organisation and should have the necessary training, skills and experience to carry out the role.

In Glencraig the ASC's are the Adult Residential Manager and Adult Day Services Manager

Responsibilities:

- Provide strategic and operational leadership in relation to adult safeguarding and implement organisational Adult Safeguarding Policy.
- Act as the main point of contact with HSC trusts and the PSNI for all adult safeguarding matters. In the absence of ASC, any concerns should be reported to the Appointed person.
- Ensuring that Camphill Community Glencraig as an absolute minimum, safeguards adults at risk by being aware of signs of harm, reducing the opportunities for such activities and knowing how and when to report concerns to the correct authorities.
- ASC is responsible for ensuring this policy is implemented within their facility and ensuring the regional protocols and local procedures are followed when suspected, alleged or actual abuse has been reported.

- All staff have a duty to report any suspected or alleged allegations of abuse to the Manager/ASC or a person in charge as soon as it is suspected, alleged or actual incidents have occurred.
- Reporting governance issues to the Head of Social Care, Responsible Person and Social Care Governance Committee
- Production of an Annual Adult Safeguarding Positioning Report

9. Preventing Safeguarding Concerns

In accordance with statutory guidelines, Camphill Community Glenraig will safeguard adults at risk of harm by ensuring the following measures are in place:

9.1 Recruitment of Staff (Employees and Volunteers):

- Pre-employment interviews are held
- New staff are employed in line with Employment Rights (NI) Order 1996
- Two written references are obtained
- An appropriate level Access NI check will be completed
- A comprehensive induction is carried out including appropriate Safeguarding Training
- All appointments are subject to a six-month probationary period
- Supervisions and Appraisals take place in accordance with the Minimum Residential/Day Care Standards and Regulations

9.2 Adult Safeguarding Training:

- Adult Safeguarding Training will be undertaken by all staff as part of the induction programme.
- The appropriate levels of Adult Safeguarding Training will be provided and must be kept up-to-date
 - Level 1 Adults At Risk Introduction Online - For All Staff – Renew annually
 - Level 2 Adults At Risk – In person - For All Staff – Renew 3 yearly
 - Level 3 Adult Safeguarding Champion - For ASCs - Renew 3 yearly
 - Level 3 Adult Safeguarding Appointed Person - Renew 3 yearly
(For all members of the Out of Hours Safeguarding Team)
- All staff are required to complete all the mandatory trainings and other trainings relevant to their roles and responsibilities, for example First Aid, Epilepsy, CPI (MAPA), PBS, Medication training and renew as appropriate.

10. External Reporting and Investigations

10.1 External Reporting

In dealing with an allegation against a member of staff, Camphill Community Glenraig has a dual responsibility:

1. Firstly, to the Adult in need of safeguarding.
2. Secondly, to the staff member.

There may be emergency situations where it is appropriate to contact the Regional Emergency Social Worker Service or PSNI immediately

In the event of a Safeguarding Adult enquiry being undertaken, the HR Department will notify the following organisation:

- NI Social Care Council or relevant Professional Body.

In the event of a Safeguarding Adult enquiry being upheld, the HR department will notify the following organisation:

- The Disclosure & Barring Service.

Health & Social Care Trusts and the RQIA will be notified
The Charities Commission are notified for certain criteria

10.2 Service User to Service User Abuse

Camphill Community Glencraig has a responsibility to respond to all cases of suspected or alleged abuse from whatever source. This includes the protection of adults from each other.

- While it is acknowledged many incidents are behavioural, all adults at risk and in need of protection have a right to live in safety without fear of violence or abuse in any form.
- All incidents where one adult is aggressive/violent towards another, must be reported on the Adult Incident Report Forms, noting a Safeguarding concern.
- Taking account of the safeguarding thresholds, the Adult Safeguarding Champion/Appointed Person, will screen incidents and report to the relevant Trust and RQIA as appropriate

10.3 Staff to Service User Abuse : Safeguarding Investigations Guidance for employees only.

Please contact the HR department for specific guidance on managing safeguarding concerns for bank staff, volunteers and also agency workers.

There may be up to four possible processes involved in responding to a concern or allegation which may run concurrently:

- i. a police investigation of a possible criminal offence (known as Joint Protocol)
- ii. enquiries and assessment by Health and Social Care Trust Safeguarding Teams about whether an adult is in need of protection/support (known as a Single Protocol)
- iii. an internal employment investigation (including misconduct or performance action)
- iv. A NISCC Fitness to Practise investigation

If during the internal employment investigation, information comes to light regarding the worker's involvement in other activities with adults, then this information should be passed to the safeguarding team who will consider whether the information is relevant to others and there is evidence to justify the concern being shared.

A police investigation will take precedence over any internal safeguarding or employment investigation. As such an internal employment investigation will not usually commence until the police investigation has been completed and only after being discussed with the Care Manager/Social Worker at the safeguarding meeting.

Once it has been agreed, the internal employment process and the internal safeguarding investigation run in parallel.

As with any other concern or allegation, it is normal to carry out a preliminary enquiry to establish the initial facts. Doing so should also help to identify whether the concern/allegation raises a misconduct or a performance issue. Guidance to help with this decision can be found in the appropriate procedure and by contacting HR.

When a safeguarding allegation has been reported against a member of staff, they are removed from that area of work to other duties or placed on restricted duties, where possible for their own and service user protection. Where it is not possible to offer suitable redeployment opportunities the Organisation will move to place the member of staff on pre-cautionary suspension. Suspension from duty on pay is typically based on your average working hours during the previous 6 months and is not regarded as disciplinary action.

Appendix 1 Types of Abuse

1. Types of Abuse

1.1. Physical abuse including:

- Slapping
- Kicking
- Pushing
- Hitting
- Force feeding
- Exposure to heat or cold
- Misuse of Medication/Improper administration of medication
- Denial of treatment
- Misuse or illegal use of Restraint and Deprivation of Liberty
- Inappropriate sanctions

1.2. Sexual abuse including:

- Rape
- Sexual assault
- Sexual acts to which the person has not consented, or could not consent or was pressured into consenting
- Inappropriate touching or exposure
- Sexual advances which may not involve direct contact with the person with the learning difficulty/disability, such as repeated sexual remarks, taunts, exposure to pornographic material or being made to witness sexual activity against their wishes

1.3. Psychological / Emotional abuse including:

- Emotional ill treatment
- Threats of harm or abandonment
- Deprivation of contact
- Humiliation
- Blaming
- Controlling
- Intimidation
- Coercion
- Harassment
- Verbal cruelty
- Isolation or withdrawal of services or support networks

1.4. Financial or Material abuse including:

- Theft
- Fraud

- Exploitation
- Pressure in connection with wills, property, inheritance or financial transactions (this should include witnessing service user's wills and benefiting from their wills)
- Misuse or misappropriation of property, possessions or benefits (including borrowing)

1.5. Neglect and Acts of Omission including:

Neglect occurs when a person deliberately withholds, or fails to provide, appropriate and adequate care and support which is required by another adult. It may be through a lack of knowledge or awareness, or through a failure to take a reasonable action given the information and facts available to them at the time.

- Ignoring medical or physical needs
- Incorrect administration of medication
- Failure to provide access to appropriate health or social care or education services
- The withholding of the necessities of life, such as adequate nutrition and heating
- Failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the capacity to assess risk

1.6. Institutional / Organisational abuse including:

Institutional abuse is the mistreatment or neglect of an adult by a regime or individuals in setting which adults who may be at risk reside in or use.

- Lack of positive responses to complex needs
- Rigid routines resulting in poor standards of care, poor practices and behaviours. Rigid routines which violate the dignity and human rights of the adults and place them at risk of harm.
- Culture that denies, restricts or curtails privacy, dignity, choice and independence.
- Collective failure of a service provider or an organisation to provide safe and appropriate services.
- Failure to ensure that the necessary preventative and/or protective measures are in place.
- Insufficient knowledge base within the service
- Lack of basic easily understood information

1.7. Exploitation abuse including:

- Maltreatment
- Manipulation
- Taking Advantage / abuse of Power
- Slavery
- Servitude
- Forced Labour
- Domestic Violence

- Human Trafficking

2. Signs and Symptoms:

It is important to be aware of and alert to signs and symptoms, non-verbal communication, or change of behaviour as this could indicate poor practice that may be being hidden or denied. Sexual and psychological signs and symptoms can be very similar due to the emotional impact and degree of manipulation that may be carried out in 'grooming' a victim.

2.1. Signs and Symptoms of Physical abuse:

- Injuries in the shape of objects
- Persistent injuries
- Injuries that have not received medical attention
- Going to a range of different medical facilities
- Skin infections
- Dehydration
- Unexplained weight changes or medication being lost
- Behaviour that shows the person is afraid
- Change of behaviour or avoidance
- Injuries consistent with physical abuse

2.2. Signs and Symptoms of Sexual abuse:

- Sexually transmitted diseases
- Pregnancy
- Tears / bruises/soreness in genital/anal area
- Soreness when sitting
- Anorexia, bulimia or self-harm
- Sexualised behaviour

2.3. Signs and Symptoms of Psychological abuse:

- Difficulty for the person to gain access to others outside of their main carer
- No access to medical care or appointments to see other agencies
- Low self esteem
- Lack of confidence and increased anxiety
- Increased levels of confusion
- Incontinence
- Sleep disturbance
- Feeling or acting as if being watched
- Difficulties with communication
- Unusual/different language
- Deference/submission to the perpetrator

2.4. Signs and Symptoms of Financial or Material abuse:

- Sudden loss of assets
- Unusual or inappropriate financial transactions

- Visitors arrive each week on the same day a person's benefits are cashed
- Insufficient food in the house
- Bills not being paid
- A person's life experiences and wishes are being ignored or disregarded due to the finances they are bringing into the home
- Malnutrition
- Rapid or continuous weight loss
- Not having access to necessary physical aides
- Inadequate or inappropriate clothing

2.5. Signs and Symptoms of Neglect or Acts of Omission:

- Untreated medical problems
- Dirty clothing/bedding
- Lack of personal care

2.6. Signs and Symptoms of Institutional abuse:


- Poor Corporate Governance and Collective Moral Responsibility
- Poor care standards
- Inadequate staffing
- Poor training

2.7. Signs and Symptoms of Discriminatory abuse:

- A person overly concerned about race, sexual orientation
- A person tries to be more like others
- An angry reaction to comments about 'differences'
- Disparaging remarks
- A person is made to dress differently
- A person's religious/cultural beliefs are not supported or enabled

Appendix 2 Relevant Legislation, Policies and Frameworks

- The Human Rights Act 1998
- The Equality Act 2010
- The Criminal Law (NI) Act 1967
- Health and Social Care Act 2012
- Mental Health Capacity (NI) Act 2016
- Safeguarding Adults at risk and in need of protection DHSSPS, September 2006
- Protection of Children and Adults at risk and in need of protection (Northern Ireland) Order 2003
- Health and Personal Social Services (Regulation & Quality Improvement) (Northern Ireland) Order 2003 and Associated Regulations
- Seeking Consent: Working with People with Learning Disabilities
- The Disability Discrimination Act 1995

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- The Public Interest Disclosure (NI) Order 1998
 - Protocol for Joint Investigation of Adult Safeguarding Cases (NIASP, 2016)
 - The Mental Health (NI) Order 1986
 - The United Nations Convention on the Rights of the Child 1989
 - The Children (NI) Order 1995
 - The Safeguarding Vulnerable Groups (NI) Order 2007 (as amended by The Protection of Freedoms Act 2012)
 - The Sexual Offences (NI) Order 2008

Alongside legislation, the Department of Health, Social Services and Public Safety, in conjunction with the Department of Justice, have produced a working policy document for safeguarding adults '*Adult Safeguarding, Prevention and Protection in Partnership July 2015*'.

All staff in Camphill Community Glencraig accept and recognise their responsibilities to develop awareness of issues which cause harm and to report and record these in compliance with the guidance provided by the Care Regulator and local Adult Support and Protection Service. Please refer to:

HSC Adult Safeguarding Operational Procedures – Adults at Risk of Harm and Adults in Need of Protection, September 2016.

Appendix 3 Related Policies Summary

Confidentiality

Any information relating to an adult at risk should be confidential and shared on a need to know basis only. Staff should be clear that information relating to a concern, disclosure or allegation or suspicion should not be discussed inside or outside the organisation, other than with those who need to know (line manager, registered manager, appointed person, responsible individual).

Suspected or alleged incidents of abuse can be reported from several sources. Regardless of the source, all complaints of suspected, alleged or actual abuse must be acted on immediately and appropriately. Some sources of reporting may come from:

- The resident
- A member of staff
- A relative of visitor
- One of the statutory agencies
- Other healthcare professionals
- Local MPs

Whistleblowing

Where a member of staff raises a concern about misconduct, illegal or underhand practices by another staff member in the Organisation, or about the way care and support is being provided, such as practices that cause harm or risk of harm to others or are abusive, the staff member should disclose this information to their manager under the Organisation Whistle Blowing Policy.

Anyone making a complaint, allegation or expressing concern should be assured:

- that they will be taken seriously;
- that their comments will be treated confidentially but their concerns may be shared if they or others are at risk;
- that they will be dealt with fairly;
- that staff will be given support and protection under Whistleblowing Legislation

Staff Training

All staff will receive training on Adult Safeguarding on commencement of employment and annual refresher training thereafter. The training provided ensures staff can demonstrate knowledge of:

- Protection from abuse
- Indicators of abuse
- Responding to suspected, alleged or actual abuse
- Reporting procedures



Recruitment of Staff

All staff must be recruited in line with the Safe Recruitment and Selection of Staff Policy. All staff will be required to have the appropriate checks completed prior to commencement of employment under the Protection of Children and Adults at risk and in need of protection (NI) Order 2003 (ACCESS NI).

Code of Behaviour

Camphill Community Glencraig expects an appropriate standard of behaviour from all staff. These standards are based on the values and a mission of the organisation and are based on the principles of care. These standards are also in conjunction with the standards of expected behaviour of NISCC and NMC.

Disciplinary Policy

Where the outcome of the safeguarding investigation suggests that misconduct has occurred, a disciplinary investigation of the allegations against the staff member should be undertaken in accordance with the Organisations Disciplinary Policy. This should be conducted separately from any enquiry or investigation under the Adult Safeguarding Policy, although there may be need for simultaneous action for the co-ordination and sharing of information.

Appendix 4 Managing Safeguarding Investigations

Further Information on Safeguarding related Investigations

APP4.1 Guidance on managing misconduct and managing performance safeguarding cases

An internal employment investigation is perhaps more likely to apply to a misconduct issue, however even where a safeguarding allegation is thought to relate to a performance issue there is a need to ascertain the facts and draw together relevant material.

For the purposes of this guidance, an investigation that relates to either a misconduct or a performance issue will be referred to as an employment investigation (as opposed to a safeguarding or police investigation).

Reference should be made to the appropriate policy throughout the management of any employment investigation that involves safeguarding concerns.

In an employment investigation involving a safeguarding concern it is important to note that:

- when a safeguarding concern arises (as opposed to a specific allegation) it is still important to treat this seriously and to investigate the circumstances. A singular concern may appear relatively minor however there may be a series or pattern of such concerns that collectively amount to a much bigger issue. If the staff member is registered with NISCC a referral should be made to [NISCC](#) Fitness to Practise team. An employment investigation will identify the circumstance and an appropriate means of managing this
- the purpose of an employment investigation is to gather evidence in order for the employer to decide whether an employee has engaged in misconduct or whether an employee is capable (or not) of carrying out their role. An employment investigation is distinct from a police investigation and should be carried out even where a police investigation has already taken place
- during any key stages of the employment investigation process contact should be maintained with the relevant health and social care team as either investigation process could impact on the other. Keeping safeguarding colleagues informed of the progress made in the employment investigation supports them to fulfil their role
- a safeguarding allegation, by its very nature, will be sensitive and confidential and therefore must be treated accordingly. There will however, in the interests of safeguarding, be a need to share information.
- the views and account of the service user should be taken into consideration as part of the employment investigation process where possible. The investigating officer / manager will need to consider how this can be achieved. Usually this can be through a verbal / written statement provided by the service user. If the preference is to interview a service user, advice should be sought from the social care team as to the capacity of the service user. Consideration should also be given as to who is best to undertake an interview.
- once it has been agreed with the police and relevant agency that it is appropriate to do so, the worker subject to a concern or allegation should be kept informed of the progress of the employment investigation and provided with information regarding the next steps

- the service user / parents / relatives can be informed that the matter is being managed but the details of the way it is being managed nor the outcome should be shared. The suggested approach is to simply confirm this is a confidential employment matter but any allegations are dealt with under the appropriate internal policies and procedures
- obtaining a clear view from the relevant agency and internal safeguarding team of the nature of the concerns and their severity will help inform and direct any employment investigation.

APP4.2 Investigations involving multiple employment / working

It is not uncommon for employees to work in more than one area of Glenraig. Following a concern being raised, an assessment of the situation will be carried out to consider whether the concern is relevant to one or both/all of the employment relationships. This assessment should be reviewed throughout the investigation to ensure the situation is managed appropriately.

Following an assessment, where it is considered to be relevant, thought needs to be given to how the internal employment investigation will be managed. Where possible it will be managed as a single case. This is beneficial for the department/s from a resource perspective and also for the employee to minimise undue stress. If the worker's second role is within a school or training college environment, contact should be made with the relevant manager. Care must be taken to fully explain to the employee how the case will be managed in these particular circumstances.

Both departments should remain in contact throughout the duration of the investigation and key decisions should be shared with the relevant manager in that area.

APP4.3 When an employee leaves before a case is concluded

An employee may decide to resign from their position before the internal employment investigation has reached a conclusion.. In such circumstances, due to the allegations being of a safeguarding nature, the investigation should continue and a formal meeting held where appropriate.

- The employee should be informed of this principle and offered the opportunity to continue to participate in the investigation and hearing process. If they decline, the case will continue without their co-operation.
- If the outcome of a panel hearing is that the employee would have been dismissed, had they not resigned, where the employee works in a regulated activity this will result in a referral to the [Disclosure and Barring Service](#)
- The employee will be informed in writing of the outcome of the investigation.
- The resignation, plus the outcome of the internal employment investigation, will be shared if requested in any future reference provided by Camphill Community Glenraig.

APP4.4 Termination of employment by mutual agreement or settlement agreement

An employee subject to an investigation of a safeguarding nature might approach Camphill Community Glencraig to seek to end their employment by a mutual agreement or settlement agreement.

Entering into such an agreement is inappropriate where there is a serious concern regarding the employee's suitability to work with children or adults and is contradictory to safeguarding guidance. Therefore, such agreements will only be used in exceptional cases.

Appendix 5 Safeguarding Poster (Aug 2022)

Sep 2022

Safeguarding Team

ADULT RESIDENTIAL

8am – 6pm

What do I do if I'm worried or concerned about someone?



Ellen McVeigh

Safeguarding Champion

0789 004 2446



Fiona Robinson

Appointed Person

0794 925 7924



Deborah Rice

Appointed Person

0798 070 5776



Tracey McCoubrey

Appointed Person

0743 658 3993

IN THE EVENT OF ANY SAFEGUARDING CONCERNS, ALL MEMBERS OF STAFF HAVE A DUTY TO REPORT DIRECTLY IN THE FIRST INSTANCE, TO THEIR LINE MANAGER OR IF NOT AVAILABLE, TO THE SAFEGUARDING OFFICER ON DUTY.

Sep 2022

Safeguarding Champions

DAY SERVICES

What do I do if I'm worried or concerned about someone?



Anna Picmanova

Safeguarding Champion

0781 407 9217



Dáire McGrattan

Appointed Person

0798 968 9624

IN THE EVENT OF ANY SAFEGUARDING CONCERNS, ALL MEMBERS OF STAFF HAVE A DUTY TO REPORT DIRECTLY IN THE FIRST INSTANCE, TO THEIR LINE MANAGER OR IF NOT AVAILABLE, TO THE SAFEGUARDING OFFICER ON DUTY.

Sep 2022

Out of Hours On Call

What do I do if I'm worried or concerned about someone?

Siobhan Dornan	0798 070 5528	Ellen McVeigh	0789 004 2446
Jennifer Gallanders	0758 313 6887	Stephen Murphy	0792 987 0176
Suzanne Gillespie	0798 070 5913	Anna Picmanova	0779 438 1748
Tracey McCoubrey	0743 658 3993	Deborah Rice	0798 070 5776
Dáire McGrattan	0798 968 9624	Fiona Robinson	0794 925 7924

Please see this month's on-call rota to contact the appropriate person

Please phone the Safeguarding On-Call in Camphill Community Glenraig as per rota if an incident occurs outside office hours.

For further reference in regards contacts for Children Safeguarding at Glenraig

Sep 2022

Safeguarding Children and Young People

What do I do if I'm worried or concerned about someone?

CHILDREN'S RESIDENTIAL

Suzanne Gillespie

Safeguarding Champion

0798 070 5913



Jenny Gallanders

Appointed Person

0758 313 6887

SCHOOL

Tracy Yandall

Designated Teacher

0798 070 5916



Patricia McIlhone

Deputy Designated Teacher

0798 070 5787

IN THE EVENT OF ANY SAFEGUARDING CONCERNS, ALL MEMBERS OF STAFF HAVE A DUTY TO REPORT DIRECTLY IN THE FIRST INSTANCE, TO THEIR LINE MANAGER OR IF NOT AVAILABLE, TO THE SAFEGUARDING OFFICER ON DUTY