

# SAFEGUARDING POLICY & PROCEDURES

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Equality, Diversity, Inclusion & Safeguarding (EDIS) Unit

May 2025

# Housing Executive Safeguarding Policy

Equality, Diversity, Inclusion and Safeguarding Team

	<b>Housing</b> Executive
Title	Housing Executive Safeguarding Policy
Aim	The purpose of this Safeguarding Policy is to ensure that employees are aware of the issues that can cause harm to children and adults at risk or in need of protection and the procedures in place to report concerns.
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# Contents

<b>Contents</b> .....	<b>4</b>
<b>Introduction</b> .....	<b>5</b>
<b>Section 1: Safeguarding Policy Statement</b> .....	<b>6</b>
<b>Section 2: Recruitment and Selection of Employees</b> .....	<b>14</b>
<b>Section 3: Procedures for the effective management, support, supervision and training of employees</b> .....	<b>14</b>
<b>Section 4: Safeguarding Children and Adults</b> .....	<b>16</b>
<b>Section 5: Procedures for Reporting</b> .....	<b>22</b>
<b>Section 6: Code of Behaviour</b> .....	<b>25</b>
<b>Section 7: Guidelines for Sharing Information</b> .....	<b>28</b>
<b>Appendix 1: Safeguarding Officers&amp; Deputies</b> .....	<b>300</b>
<b>Appendix 2: Types of Abuse in Relation to Children</b> .....	<b>311</b>
<b>Appendix 3: Types of Abuse in Relation to Adults at Risk/in Need of Protection</b> .....	<b>34</b>
<b>Appendix 4: Guidance on Dealing with Disclosures of Abuse or Safeguarding Concerns</b> .....	<b>37</b>
<b>Appendix 5: Reporting Procedure Flowchart</b> .....	<b>39</b>

## Introduction

The Housing Executive has a zero-tolerance of abuse wherever it occurs or whoever is responsible. We treat the safeguarding of children and young people and adults at risk and in need of protection as a matter of priority. This is closely linked with the organisations vision of 'working in partnership to ensure that everyone has access to a good affordable home in a safe and healthy community'.

Families with children, and some adults who are at risk or may be in need of protection are Housing Executive customers and access Housing Executive premises and services. This Policy and Procedures sets out the Housing Executive's policy with regard to the safeguarding of both adults and children; and what is expected from employees. We have both a moral and legal obligation to ensure that we provide the highest professional standard of care at all times and that proper procedures are in place for safeguarding.

We acknowledge the rights of children, and adults at risk or in need of protection, and make a clear commitment to uphold those rights by creating and maintaining an environment which aims to ensure, as far as possible, that where they avail of Housing Executive services e.g. our tenants they are kept free from abuse and exploitation.

Everybody who works for the Housing Executive has a responsibility for the safety of children and adults in need of protection. In accordance with relevant legislation we are committed to ensuring that this policy actively promotes and enhances safeguarding at all times.

The purpose of this Safeguarding Policy<sup>1</sup> is to ensure that employees are aware of the issues that can cause harm to children and adults at risk or in need of protection and the procedures in place to report concerns.

This safeguarding policy applies to everyone involved with the organisation, including members of the Board, senior and all managers, staff, children and their families, and adults who may be at risk or in need of protection, and their carers, advocates and visitors. The policy also outlines our expectations with respect to contractors or other third parties who use or are working in Housing Executive accommodation or premises.

It is important that this policy is implemented effectively, efficiently and in a professional manner. To ensure that this happens the Housing Executive will review the policy every three years. A Safeguarding Champion's report on both the

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<sup>1</sup> The policy is a consolidation of the Housing Executive's previous 'Child Protection' and 'Safeguarding Vulnerable Adults' policies which were developed in consultation with a wide range of stakeholders including both statutory and voluntary sector professionals.

effectiveness of the policy and its implementation will be completed on an annual basis.

## **In Summary:**

The Housing Executive will endeavour to safeguard children and adults we work with by:

- adhering to our safeguarding policy, procedures and guidelines
- carefully following the procedures laid down for the recruitment and selection of employees;
- providing effective management for employees through support, supervision and training;
- implementing clear procedures for reporting concerns to the Safeguarding Team/statutory agencies;
- implementing a code of behaviour for employees;
- appropriately managing personal information, confidentiality and information sharing;
- Ensuring all adults at risk or in need of protection irrespective of their age, religion, culture, disability, gender, ethnicity, sexual orientation, nationality, family, dependency, or marital status have the right to protection from abuse.

## **Section 1: Safeguarding Policy Statement**

### **1.0 The Scope of this Policy**

This Safeguarding Policy is intended to cover all functions and services of the Housing Executive where there is the potential for direct or indirect contact with children or adults who may be at risk or in need of protection.

Employees of the Housing Executive, relevant employees of contractors who carry out work for the Housing Executive, and relevant employees and volunteers of organisations funded by the Housing Executive, should all be committed to practices which protect children and adults in need of protection.

### **1.1 Who is a Child?**

- Children, child or young person is used to refer to anyone under the age of 18 years.
- Parent is used as a generic term to represent parents, carers and guardians.

## 1.2 Who is an Adult at Risk and an Adult in Need of Protection?

An 'adult at risk of harm' is a person aged 18 or 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.

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 (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.) **AND/OR**
- b) Life Circumstances (may include, but are not limited to, isolation, socio-economic factors and environmental living conditions); **AND**
- c) Who is unable to protect their own well-being, 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 or 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).

An adult may be at risk of harm because he or she has a mental health problem, a disability, a sensory impairment, is old or frail, or has some form of illness. An individual may go through periods of temporarily being at risk or may be at risk on a more permanent basis.

The individual may be in receipt of a care service in his or her own home, in the community or be resident in a residential care home, nursing home or other institutional setting; however they do not require to be in receipt of formal care for this safeguarding policy to apply.

Where there is a concern about an "adult at risk" who is not an 'adult in need of protection' further advice and guidance is available from the Equality & Safeguarding Manager.

### 1.3 Legal Context

Children and adults at risk or in need of protection are safeguarded in the same way as any other person against criminal acts. If a person commits theft, rape or assault against a child or an adult at risk or in need of protection, s/he should be dealt with through the criminal justice system in the same way as any other perpetrator.

Where there is a reasonable suspicion that a criminal offence may have occurred, it is the responsibility of the police to investigate and make a decision about any subsequent action.

The police should always be consulted about criminal matters.

There are a number of pieces of legislation relating to safeguarding and protecting children and adults these include:

- **The Human Rights Act 1998** (enacted 2000) - The rights of children and adults at risk to live a life free from neglect, exploitation and abuse are protected by the Human Rights Act 1998. Specifically, 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).
- The Safeguarding Vulnerable Groups (Northern Ireland) Order 2007 (amended by the Protection of Freedoms Act 2012).
- The Criminal Law Act (Northern Ireland) 1967.
- The United Nations Convention on the Rights of the Child.
- The Children (NI) Order 1995.
- The Sexual Offences (Northern Ireland) Order 2008.
- The Family Homes and Domestic Violence (Northern Ireland) Order 1998.
- The Mental Health (Northern Ireland) Order 1986.
- Mental Capacity Act (NI) 2016.
- The Public Interest Disclosure (Northern Ireland) Order 1998.
- The Human Trafficking & Exploitation (Criminal Justice & Support for Victims) Act (NI) 2015.
- Section 75 of the Northern Ireland Act 1998.
- The Disability Discrimination Act 1995.
- The Human Rights Act (1998)
- Children's Services Co-operation Act (Northern Ireland) 2015
- The Health and Personal Social Services (Northern Ireland) Orders and the Health and Social Care (Reform) Act (Northern Ireland) 2009.
- The Police and Criminal Evidence (Northern Ireland) Order 1989.
- The Race Relations (Northern Ireland) Order 1997.
- The Criminal Evidence (Northern Ireland) Order 1999.



- The Health and Personal Social Services Act (Northern Ireland) 2001.
- The Health and Personal Social Services (Quality, Improvement and Regulation) (Northern Ireland) Order 2003.
- Domestic Abuse and Civil Proceedings Act (NI) 2021.
- Protection from Stalking Act (NI) 2022.
- Offence of non-fatal strangulation or asphyxiation (2023)

## **1.4 Values and principles underpinning this policy**

Our safeguarding policy is underpinned and guided by a number of values and principles.

In relation to safeguarding children and young people, we recognise in particular the following principles guided by the Children (NI) Order 1995 and the Children's Services Co-operation Act (Northern Ireland) 2015. The Housing Executive are a named organisation in both pieces of legislation. Both pieces of legislation provide the Housing Executive with the legal basis to work with Health and Social Care Trusts in relation to child safeguarding. This is further explained in section 4.

### **Children (NI) Order 1995**

1. The child or young person's welfare is paramount – the welfare of the child is the paramount consideration.
2. The voice of the child or young person should be heard – children and young people have a right to be heard, to be listened to and to be taken seriously, taking account of their age and understanding. They should be consulted and involved in all matters and decisions which may affect their lives and be provided with appropriate support to do so where that is required.
3. Partnership – safeguarding is a shared responsibility and the most effective way of ensuring that a child's needs are met is through working in partnership. Sound decision-making depends on the fullest possible understanding of the child or young person's circumstances and their needs. This involves effective information sharing, strong organisational governance and leadership, collaboration and understanding between families, agencies, individuals and professionals.
4. Prevention – the importance of preventing problems occurring or worsening through the introduction of timely supportive measures.
5. Protection – Children should be safe from harm and in circumstances where their needs are not being met they must be protected.

## **Children’s Services Co-operation Act (Northern Ireland) 2015**

Section 1 (2) of the Children’s Services Co-operation Act (Northern Ireland) 2015 documents what is meant by the well-being of children and young persons (for the purpose of the act):

(1) The functions conferred by this Act are to be exercised for the purpose of improving the well-being of children and young persons.

(2) For this purpose the “well-being” of children and young persons includes—

(a) physical and mental health;

(b) the enjoyment of play and leisure;

(c) learning and achievement;

(d) living in safety and with stability;

(e) economic and environmental well-being;

(f) the making by them of a positive contribution to society;

(g) living in a society which respects their rights;

(h) living in a society in which equality of opportunity and good relations are promoted between persons who share a relevant characteristic and persons who do not share that characteristic.

With respect to safeguarding adults, we recognise the principles set out in the Adult Safeguarding: Prevention and Protection in Partnership (DOH and DOJ, July 2015) document. On the advice of our Data Protection Team we further acknowledge that this document and the Adult Safeguarding Operational Procedures constitute statutory guidance and provide the legal basis for the Housing Executive to make safeguarding referrals for Adults at Risk/in Need of Protection under public task<sup>2</sup>.

The Housing Executive also adheres to the following principles:

1. Employees of the Housing Executive, relevant employees of contractors who carry out work for the Housing Executive, and relevant employees of

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<sup>2</sup> UK GDPR Article 6(1)(e) provides a lawful basis for processing where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. This applies if we are:

- Carrying out a specific task in the public interest which is laid down by law; or
- Exercising official authority (e.g. a public body’s tasks, functions, duties or powers) which is laid down by law.

- organisations funded by the Housing Executive, should all be committed to practices which promote the welfare of children and adults at risk.
2. All children should be able to develop within a safe environment.
  3. Housing Executive employees, in the course of their employment, must recognise and discharge their responsibilities:
    - To develop awareness of the issues which cause harm to children and adults at risk and in need of protection; and
    - To maintain a safe environment for those children and adults.
    - To report safeguarding concerns.
  4. The procedures for implementing this Safeguarding Procedures are set out in Section 5.
  5. The Housing Executive expects any relevant employees of its contractors, and relevant employees of organisations funded by the Housing Executive, to recognise and discharge their responsibilities:
    - To develop awareness of the issues which cause harm to children and adults at risk and in need of protection; and
    - To maintain a safe environment for those children and adults.
    - To report safeguarding concerns.

The Housing Executive has developed this policy in line with the following legislation, policies and good practice guidelines.

#### **NI Policies:**

- [Cooperating to Safeguard Children and Young People in NI](#) , Department of Health, 2017
- [Safeguarding Board for Northern Ireland Procedures Manual \(proceduresonline.com\)](#)
- [Adult Safeguarding Prevention and Protection in Partnership](#) , Department of Health and Department of Justice, 2015

#### **Good practice guidelines:**

- Keeping Children Safe, Our Duty to Care (2017), Volunteer Now [www.volunteernow.co.uk](http://www.volunteernow.co.uk)
- Keeping Adults Safe, A Shared Responsibility (2017), Volunteer Now [www.volunteernow.co.uk](http://www.volunteernow.co.uk)

The Housing Executive's Safeguarding Policy has been developed in the context of its direct relationship to a range of organisational policies and procedures including:

- Recruitment & Selection Policy
- Learning & Development Policy
- Dignity at Work Policy
- Policy of the Acceptable Use of Technology
- Whistleblowing Procedure
- Code of Conduct for Housing Executive Officers
- Performance Management Policy
- Disciplinary Procedures
- Domestic Violence Procedure
- Equal Opportunity Policy
- Health & Safety Policy
- Data Protection Policy
- Records Management Handbook and Policy Statement

All of the above internal policies can be accessed by Housing Executive employees via Huddle.

## **1.5 Management Roles and Responsibilities**

- The Chief Executive and Director of Corporate Services have ultimate responsibility for ensuring compliance with this policy.
- The Director of Corporate Services is the Safeguarding Champion for the organisation. A Safeguarding Champions Annual report is provided to the Housing Executive's Board. The Safeguarding Champion has established a cross divisional Safeguarding Champions Forum. The forum meets quarterly.
- Day to day responsibility for implementation is delegated through the management structure to the EDIS Manager and other Managers.
- Each Area and Division has a Safeguarding Officer/s (Appendix 2), who are responsible for acting as a central contact point for advice on safeguarding matters. Four Safeguarding Officers meetings chaired by the EDIS Manager are held each year. Please note throughout this policy the term Safeguarding Officer refers to both officers and their deputies.
- The safeguarding policy statement will be prominently displayed in each of the organisation's facilities and everyone involved with the organisation will have access to a copy.

## **1.6 Employee Roles and Responsibilities**

Employees have a duty to adhere to the Safeguarding Policy, Procedures and Code of Behaviour (please note the Housing Executive also has a Code of Conduct, which is a separate document) to notify their Safeguarding Officer of any concerns they

become aware of regarding the safeguarding of children and adults. Failure to do so may result in the matter being considered in line with the Housing Executive's Disciplinary Policy.

Employees should understand that:

- Breaching the Code is a serious issue and allegations relating this will be investigated in line with the Housing Executive's policies and procedures.
- If an employee is found to have been in breach of this policy and associated Code of Behaviour it may result in disciplinary action up to and including dismissal. In addition, if the breach constitutes harm/risk of harm, referral will be made to the HSC Trust / PSNI, as appropriate.

Employees are also responsible for ensuring that they undertake the relevant training identified for their post. An annual rolling programme of training is available for employees to access.

## **1.7 Training**

The EDIS Team will provide suitable training in safeguarding to employees.

In general, this training will be at three levels:

- Level 1 – e-learning promoting general awareness for all employees. New employees should complete the e-learning course as part of their induction and safeguarding will also be highlighted during the corporate induction day.
- Level 2 – face to face training for employees with substantial contact with children and/or adults in need of protection, e.g. Housing Services generally, Regional Services – Homelessness, Supporting People and Grants staff.
- Level 3 – comprehensive training designed for Safeguarding Officers and Key Managers provided by Volunteer Now.

## **1.8 Third Party Organisations**

The Housing Executive requires all contractors, groups, and organisations that use its premises or services, or organisations that are funded by the Housing Executive to provide services, to have acceptable Child Protection and Adult Safeguarding policies in place. Further details on the safeguarding requirements for 3<sup>rd</sup> party organisations including the need for Access N.I. checks can be found at 3.1.

## 1.9 Policy Review

This policy will be subject to an annual review by key officers to ensure that it is fit for purpose; a full review of the policy will be carried out every three years.

An earlier review may be directed by the Chief Executive, particularly in circumstances where changes to the law or to the organisation require it.

## Section 2: Recruitment and Selection of Employees

**2.0** The Housing Executive will operate established recruitment and selection procedures for positions where there is significant contact with children and / or adults who may be in need of protection. This includes procedures as required by Access NI and the Disclosure and Barring Service (DBS) through the Safeguarding Vulnerable Groups (Northern Ireland) Order 2007 (amended by The Protection of Freedoms Act 2012).

**2.1** All relevant Human Resources policies are available on request.

**2.2** The Housing Executive will take all reasonable steps to ensure that in its recruitment and selection of employees it will pay due regard to ensuring that:

- A clear job description exists for each role and a person specification outlining key skills and abilities required.
- A fair recruitment process is followed.
- There is an application form that covers past work; and candidates are required to demonstrate relevant skills and behaviours as part of the selection process.
- Written references are sought (and followed up when necessary).
- There is reference to regulated positions.
- An Access NI disclosure check is carried out for all successful candidates and previous convictions will be considered in line with NIHE Recruitment & Selection Policy (Section 20).

## Section 3: Procedures for the effective management, support, supervision and training of employees

**3.0 Key Issues: The Housing Executive ensures that the following provisions are in place (further information regarding these procedures is available on request).**

1. An induction process is in place (full details of the induction process are available from Learning & Development)
2. A 6 month probationary period is applicable to all roles.

3. Relevant training is provided, appropriate to the post/role (see 1.7).
4. A robust structure and process for support and supervision for all employees appropriate to the post/role is in place.
5. There is an annual performance and development review process for employees.
6. Records are kept of training completed; support and supervision; and annual performance and development reviews .

### **3.1 Contractors and Third Parties**

This category covers the following situations:

- 1) Where a contractor/third party provides services to the Housing Executive.
- 2) Where a contractor/third party provides services to others on behalf of the Housing Executive.
- 3) Where a contractor/third party carries out functions on behalf of the Housing Executive.

Contractors will be expected to have appropriate Safeguarding policies in place. If third party organisations use volunteers safeguarding procedures/vetting procedures must also cover those volunteers. As a minimum requirement, all such organisations must accept and apply the standards as outlined within this Policy. This policy is commended to contractors as a useful guide and can be accessed at [www.nihe.gov.uk](http://www.nihe.gov.uk)

A copy of the Policy will also be made available on request and safeguarding training can be offered to third parties.

All Contractors/third parties must ensure that a basic Access NI check is conducted for ALL employees used in the conduct of business with Housing Executive tenants and customers. This means that only employees with a valid Access NI disclosure certificate can be used in the conduct of business in a person's home. All Contractors/Third Parties must maintain evidence to support this and may be requested by the Housing Executive to show proof of Access NI disclosure certificates during the period of the contract. Main Contractors must ensure that all subcontractors fulfil these duties as well.

In this policy, a "contractor" means an external contractor and includes building & maintenance contractors, consultants, research organisations, Supporting People providers, furniture removal and storage organisations and any other organisation in a contractual relationship with the Housing Executive.

## **Section 4: Safeguarding Children and Adults**

### **4.0 Housing Executive Responsibilities specific to Children**

The DHSSPS Policy “Co-operating to Safeguard Children and Young People in Northern Ireland” (August 2017) states that “the NIHE can play an important role in safeguarding children and young people through recognition and referral of harm or risk of harm. Through their day to day contact with families and communities, housing officers may become aware of concerns about the welfare of children and young people and should inform the relevant HSCT about such concerns”.

“In accordance with their duty to assist under Articles 46 and 66 of the Children Order, the NIHE must share relevant information and attend case conferences when requested. The NIHE can make a further important contribution to safeguarding children and young people through the provision of accommodation or support services for young people who may be vulnerable and/or homeless, or at risk of becoming homeless, including young people leaving care.”

“The NIHE must have child safeguarding policy and procedures in place to ensure their employees and relevant employees of organisations funded by them are aware of and committed to practices that safeguard children and young people.”

### **4.1 How are Children Safeguarded?**

Safeguarding children is more than child protection. Safeguarding begins with promotion and preventative activity which enables children and young people to grow up safely and securely in circumstances where their development and wellbeing is not adversely affected. It includes support to families and early intervention to meet the needs of children and continues through to child protection.

Child protection refers specifically to the activity that is undertaken to protect individual children or young people who are suffering, or are likely to suffer significant harm.

A child in need of protection is a child who is at risk of, or likely to suffer, significant harm which can be attributed to a person or persons or organisation, either by an act of commission or omission; or a child who has suffered or is suffering significant harm as defined in Article 50 of the Children (Northern Ireland) Order 1995.

All children and young people have a fundamental right to be safeguarded from harm.



## 4.2 Who abuses children?

Abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health, or if they live in a home where domestic abuse happens. Abuse can also occur outside of the family environment.

Evidence shows that babies and children with disabilities can be more vulnerable to suffering abuse.

You can't tell by looking at a person whether they are an abuser – they don't appear different from the rest of society:

- Abusers come from all classes in society, all professions and all cultures.
- Abuse of children may sometimes be carried out by strangers but it is much more common that the abuser is known to the child and is in a position of trust and/or authority.
- It is not only adults who abuse children. Children may suffer abuse from other children and young people.

## 4.3 What Constitutes Harm?

Harm can be suffered by a child or young person by acts of abuse perpetrated upon them by others.

Although the harm from the abuse might take a long time to be recognisable in the child or young person, professionals may be in a position to observe its indicators earlier, for example, in the way that a parent interacts with their child. Effective and ongoing information sharing is key between professionals.

Harm from abuse is not always straightforward to identify and a child or young person may experience more than one type of harm or significant harm.

Harm can be caused by:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect
- Exploitation

Types of abuse in relation to children can be found at [Appendix 3](#).

## 4.4 Adult Safeguarding Responsibilities

The majority of adults live full, independent lives free from harm caused by abuse, exploitation or neglect.

However, there are some adults who, because of their situation or circumstances, may be unable to protect themselves from abuse, neglect or exploitation, and may have been harmed or may be at risk of harm.

Everyone has a fundamental right to be safe. Whatever the cause, and wherever it occurs, harm caused to adults by abuse, exploitation or neglect is not acceptable.

In September 2016 the (former) Northern Ireland Adult Safeguarding Partnership (NIASP) issued new Adult Safeguarding Operational Procedures (the procedures were developed by DOH and DOJ) to protect adults from harm caused by abuse, neglect or exploitation.

The responsibility for putting into practice these procedures lies principally with the Health and Social Care Trusts (HSC Trusts) and, where a crime is suspected or alleged, the Police Service of Northern Ireland (PSNI).

Local Adult Safeguarding Partnership- (LASP) in each Trust area have been established to give leadership and direction to the work of these agencies. The Housing Executive have representation on each of these LASPs.

**Safeguarding is everyone's business** and the Adult Safeguarding procedures are intended for use by all organisations working with, or providing services to, adults across the statutory, voluntary, community, independent and faith sectors. This includes paid employees and volunteers.

They describe what organisations need to do to provide a safe environment and how to respond appropriately to situations where an adult is at risk of being harmed or abused. There is an expectation that all organisations and their employees will work in partnership as they apply this policy.

The Housing Executive is listed in Appendix 1 of the Adult Safeguarding Prevention and Protection in Partnership policy as an organisation for whom the policy may have specific relevance.

## 4.5 How are Adults Safeguarded?

Safeguarding is a broad continuum of activity. 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, and supportive responses and services which become increasingly more targeted and specialist as the risk of harm increases.

Adult Safeguarding includes activity which **prevents** harm from occurring and activity which **protects** adults at risk where harm has occurred.

The language of adult safeguarding previously focused on protection and used the term 'vulnerable adult.' This was widely misinterpreted, often used out of context and, for some, the term implied weakness on the part of the adult, which many found unacceptable.

The new procedures moved away from the concept of 'vulnerability' and established the concept of 'risk of harm'; thereby placing the responsibility for harm caused with those who perpetrated it.

- Harm resulting from abuse, exploitation or neglect violates the basic human rights of a person to be treated with respect and dignity.
- To have control over their life and property, and to live a life free from fear.
- It can have a devastating and long lasting impact on victims, their families and carers.

It is the impact of an act, or the omission of an act, on the individual that determines whether harm has occurred. Any action which causes harm may constitute a criminal offence and/or professional misconduct on the part of an employee.

#### **4.6 What is Harm and Abuse?**

The risk of harm occurs in all socio-economic, racial and ethnic groups, regardless of gender, age or sexual orientation.

**Harm** - is 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 well-being. Harmful conduct may constitute a criminal offence or professional misconduct.

**Abuse** - is 'a single or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust, which causes harm or distress to another individual or violates their human or civil rights'. 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.

The main forms of adult abuse e.g. neglect, physical, sexual are listed at [Appendix 4](#).

## 4.7 Where might abuse occur?

Abuse can happen anywhere, including:

- In the person's own home.
- At a carer's home.
- Within day care, residential care, nursing care or other institutional settings.
- At work or in educational settings.
- In rented accommodation or commercial premises.
- In public places.
- On transport.

## 4.8 Who abuses Adults?

**Harm** resulting from abuse, exploitation or neglect can be experienced by adults in a range of circumstances, regardless of gender, age, class or ethnicity.

**Abuse** in this context is the misuse of power and control that one person has over another. Abuse may be perpetrated by a wide range of people, including those who are usually physically and/or emotionally close to the individual and on whom the individual may depend and trust.

An abuser can be anyone who has contact with the person at risk - it could be a partner, spouse, parent, child, relative, friend, main carer, informal carer, a healthcare, social care or other worker, a peer, neighbour or, less commonly, a stranger.

- Domestic/familial abuse - the abuse of an adult in need of protection by a family member such as a partner, son, daughter, sibling.
- Professional abuse - the misuse of power and abuse of trust by professionals, the failure of professionals to act on suspected abuse/crimes, poor care practice or neglect in services, resource shortfalls or service pressures that lead to service failure and culpability as a result of poor management systems.

Possible signs of professional abuse include:

- Entering into inappropriate relationships with an adult at risk or in need of protection.
- Failure to refer disclosure of abuse.
- Poor, ill-informed or outmoded care practice/s.
- Failure to support an adult in need of protection to access health care/treatment.

- Denying an adult at risk or in need of protection access to professional support and services such as advocacy.
- Inappropriate responses to challenging behaviours.
- Failure to whistle blow on issues when internal procedures to highlight issues are exhausted.

On most occasions this policy or any allegation of professional abuse will not be appropriate for dealing with a complaint about Housing Executive services or a failure to provide a service. This should be dealt with through the existing complaints procedures.

- Peer abuse - The abuse of one adult in need of protection by another within a care setting. This can occur in group or communal settings, such as day care centres, clubs, residential care homes, nursing homes or other institutional settings.
- Stranger abuse – An adult in need of protection may be abused by someone who they do not know, such as a stranger, a member of the public or a person who deliberately targets people at risk of abuse.

#### **4.9 How can you be alerted to signs of harm or abuse in Children & Adults?**

There are a variety of ways that you could be alerted that a child or adult is suffering harm:

- They may tell you themselves.
- They may show some signs of physical injury for which there does not appear to be a satisfactory or credible explanation.
- Their demeanour / behaviour may lead you to suspect abuse or neglect.
- The behaviour of a person close to the child or adult makes you feel uncomfortable (this may include another employee, peer or family member).
- Through general good neighbourliness someone else may tell you of their concerns or something that causes them concern.

Being alert to potential abuse plays a major role in ensuring that children and adults in need of protection are safeguarded; it is important that all concerns about possible abuse are reported.

## Section 5: Procedures for Reporting.

### 5.0 Reporting and recording

Safeguarding concerns are reported using the [Safeguarding Reporting System](#) on Huddle. The system can be accessed via the huddle systems page and can also be saved to the huddle app bar for easy access.

### 5.1 How to Deal with a Concern & Report It

There are a number of situations where employees need to respond to a concern or case of alleged or suspected abuse.

These are situations where:

- There are concerns about a child; OR
- A child or adult has disclosed abuse (i.e. they make an allegation of abuse).
- There are allegations or concerns about an employee, a contractor or other third party person.
- There are allegations or concerns about any other person, i.e. parent, carer etc.
- There are concerns about an adult at risk.

Employees must report all safeguarding concerns, disclosures, allegations or suspicions by completing the electronic form on the [Safeguarding Reporting System](#) without delay. We would encourage employees to err on the side of caution i.e. **If in Doubt Report it.**

- If a child or adult is already known to social services / PSNI a Safeguarding Report form should still be completed to ensure the Housing Executive has a record of any action taken by employees. Treat all new information as a new incident.
- **Where immediate danger exists or the situation warrants immediate action** ensure any necessary medical assistance has been sought and refer to the Child or Adult Gateway Team or PSNI. In line with the ICO guidance [Data sharing in an urgent situation or in an emergency](#)
- Where an employee reports their concerns or a disclosure to a Line Manager, the Line Manager should advise them to report to a member of the Safeguarding Team immediately.

- Contractors/Third Parties should follow their own policy and report through their own reporting lines. They must also immediately advise the Housing Executive of this report.

### **Confidentiality:**

- The confidentiality of the employee making a referral will be protected as far as is possible when the report form is forwarded to the Trust or PSNI.
- Safeguarding Officers and / or the EDIS Manager will discuss referrals with HSC Trusts or PSNI where appropriate, particularly with regard to the sharing of information.
- Confidentiality of the child / adult in need of protection, their family and carers, employees and any alleged perpetrator must be protected at all times, any referrals must be securely stored and information regarding a safeguarding referral will be on a 'needs to know' only basis.

For further guidance on Dealing with Disclosures of Abuse or Safeguarding Concerns see [appendix 5](#).

## **5.2 Roles & Responsibilities of the Safeguarding Team:**

### **Reacting to Concerns:**

In this section the term Safeguarding Team refers to the EDIS Unit and the other Safeguarding Officers and Deputy Safeguarding Officers located in each division and regionally across the organisation. Further information on Safeguarding Team members is available at [Appendix 2](#).

When the Safeguarding Officer/EDIS Manager is alerted to concerns about a child or adult, they should act promptly and in accordance with the reporting procedure contained in this policy including the need to:

- ensure that the child or adult is in no immediate danger and that any necessary medical or police assistance has been sought;
- consider whether the concern is a safeguarding issue or not. This may involve some 'checking out' of information provided, taking care not to investigate.
- consult with Equality & Safeguarding Manager and/or Statutory Agencies where there is any doubt or uncertainty
- make a formal referral if it is considered the concern to be a safeguarding issue.

## **Reacting to Concerns:**

If NIHE Safeguarding Team decide that a concern is not considered a safeguarding issue or a discussion has taken place with the local HSC Trust and it is decided that there should be no referral made to a statutory authority:

- The Safeguarding Team will record that a concern has been made and the reason why a formal referral has not been made.
- The reasons for not referring details and details of any other actions to be taken will be discussed with the employee who completed the report.
- The employee should raise further concerns, if and when required. This is important in cases where further concerns are raised which, when taken together, indicate that the child or adult is being harmed and protective action may be required.

### **5.3 Responding to allegations or concerns about an employee, a contractor or other third party person**

Where an allegation of abuse is made against employee within the organisation the following procedure will be followed:

- Members of the Safeguarding Team will refer to the Equality, Diversity, Inclusion & Safeguarding Manager who will immediately inform the relevant HR Business Partner. The HR Business Partner taking advice from the Equality, Diversity, Inclusion & Safeguarding Manager where appropriate will consult with the HSC Trust and/or PSNI to ensure that any subsequent action taken by the Housing Executive does not prejudice the HSC Trust or PSNI investigation;
- Through consultation with the statutory authorities, the Housing Executive will agree the most appropriate way forward;
- Following this consultation, the matter will be dealt with in line with the Housing Executive's Disciplinary Procedure with due regard to guidance from the HSC Trust and/or PSNI. The process will normally include an initial fact find and consideration of appropriate protective measures as soon as possible. This may include consideration of precautionary suspension or alternative measures in line with procedures depending on the allegations.
- If the allegation is unsubstantiated, the employee will be given support to reintegrate and resume their post as appropriate.
- If the allegation is substantiated and the employee has been found to have harmed a child/adult or put a child/adult at risk of harm, the Housing Executive will take appropriate action in line with its



disciplinary policy. The organisation notes its legal duty to refer the staff member to the Disclosure and Barring Service (DBS) under the SVG (NI) Order 2007 (as amended by the Protection of Freedoms Act 2012) where conditions are met. The DBS maintain a list of individuals barred from engaging in regulated activity with children and/or adults.

### **Overlapping Procedures:**

On some occasions a Housing Executive customer may raise a complaint about a service provision and refer to the actions or failure to act of an employee. If this happens a preliminary review conducted by the EDIS Unit will take place to understand if any perceived action or in action should be considered within the Housing Executive's Safeguarding Policy. Where it relates to dissatisfaction of a service it should be dealt with via the complaints policy.

## **Section 6: Safeguarding Code of Behaviour (The Housing Executive also has Code of Conduct, which is a separate document).**

### **6.0 Safeguarding Code of Behaviour**

The Code of Behaviour is to help minimise the opportunity for children or adults at risk or in need of protection to suffer harm and to help to protect employees by ensuring they are clear about the behaviour that is expected of them and the boundaries within which they should operate.

It sets out an expectation that everyone in the organisation and everyone who uses our services should relate to each other in a mutually respectful way.

As this Code of Behaviour is a living document it will be reviewed on a regular basis to take account of situations arising for the first time, for example, in relation to new technology and at least once every three years.

Housing Executive employees, contractors and others will encounter families with children and/or adults at risk or in need of protection in a range of situations and in a range of locations including the office, home and within housing estates and in other accommodation settings.

The Code of Behaviour also applies to the workplace where employees are under 18 or may be adults at risk or in need of protection, or in the case of work placement / job experience where appropriate or when volunteering on behalf of the Housing Executive.

It is not practical within this Policy to provide definitive guidance that will cover all situations, however the principles set out below should be applied in all situations.

Employees who breach these standards of behaviour may face disciplinary procedures.

## 6.1 Behaviours which should be avoided

These refer to behaviours that employees may slip into through lack of experience or training. While not intentionally harmful, such behaviour might be misconstrued, which ultimately could lead to allegations of abuse being made.

For example:

- **Employees must avoid** situations that result in them being alone with children except in unavoidable circumstances e.g. employees must not enter a home or premises where there is a/are unsupervised child/children.
- **Employees must avoid** situations where a child is left unsupervised in their presence during a home visit or at other premises.
- Where a prior arrangement is being made, and one or more officers will be attending, it should be made clear it is mandatory that if a child/ children will be present that an adult must also be present, except in exceptional circumstances.
- **Employees must not** spend excessive amounts of time alone with adults in need of protection away from others.
- **Employees must not** take an adult in need of protection to his/her own home.
- **Employees must not** take a child in their car/vehicle unless full consent of a parent is given and another adult is present.
- **Employees must not** take an adult in need of protection alone on car journey, unless this forms part of the organisation's core activities.
- **Employees must avoid** inappropriate language (or sexually suggestive language) in the presence of all customers and children.
- **Employees must not** do things of a personal nature for children that they can do themselves

If it is unavoidable or necessary, these kinds of behaviours should only occur with the full knowledge and consent of a manager and where an appropriate record is maintained.

## 6.2 Unacceptable Behaviours

Unacceptable behaviours are those that must always be avoided in the interests of the safety of children, adults who may be in need of protection, and employees.

For example employees must never:

- Abuse, neglect, or harm / place at risk of harm a child or adult in need of protection whether by omission or commission.
- Engage in rough physical games with children or adults in need of protection including horseplay.
- Engage in sexually provocative games engage in inappropriate touching of any form.
- Make sexually suggestive comments to or about a child or adult in need of protection, even in fun.
- Form an inappropriate relationship with an adult in need of protection.
- Gossip about personal details of children or adults in need of protection and their families.
- Make/accept loans or gifts of money from an adult in need of protection.

### **6.3 Diversity and additional care and support needs.**

Employees should:

- Be open to and aware of diversity in the beliefs and practices of children, adults at risk or in need of protection and their families.
- Be aware of the difficulties posed by language barriers and other communication difficulties.
- Not discriminate against anyone on the grounds of different cultural backgrounds and beliefs from their own.
- Use the procedures outlined in this Policy to report any discrimination against children, adults in need of protection, or their families by other staff members.

### **6.4 The use of technology, including photography.**

New technologies, such as social networking websites and mobile phones, can be misused by those who are intent on harming or exploiting children or adults in need of protection and their families.

Employees should:

- Never photograph/video a child or adult, even by mobile phone, without the valid consent of a parent, guardian or the adult concerned, and then only if there is a valid business reason for doing so.
- Ensure that any photographs/videos taken of a children or adults are appropriate.
- Report any inappropriate use of images of children or adults.

- Where children or adults in need of protection are aware of the dangers associated with new technology, such as social networking sites and the internet, they may tell someone if they encounter anything that makes them feel unsafe or threatened; this should be treated as a 'disclosure'.

## **Section 7: Guidelines for Sharing Information**

### **Confidentiality and Information Sharing**

- 7.1** Confidentiality must be maintained for all concerned and we must be sure that we are sharing information only with the appropriate agencies.
- 7.2** Information will be handled and disseminated on a need to know basis only and in line with the requirements of data protection legislation e.g. Safeguarding Officers, HSC Trust, PSNI, child, parents, an adult in need of protection, courts and relevant employees.
- 7.3** Recorded information will be stored in a secure place in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).
- 7.4** If enquiries arise from the public or any branch of the media, employees must not make any comments regarding any situation relating to safeguarding; all queries should be referred to Communications.
- 7.5** Freedom of Information requests regarding Safeguarding reports will be dealt with by the appropriate FOI Officer on a case-by-case basis; however, this would be considered the personal data of an individual, unless it is the individual asking for a copy of their own information. It is more than likely the information will be withheld under Section 40 (2) Personal Data. If it is the individual asking for their own personal data under FOI this will be withheld under Section 40 (1) and will be treated as a Subject Access Request.
- 7.6** Subject Access Requests (SARs) regarding Safeguarding reports will be dealt with by the appropriate DSR Co-Ordinator on a case-by-case basis. Requests for Safeguarding reports under SAR should be referred to the relevant DSR Co-Ordinator or to the Data Protection Team.
- 7.7** Complaints procedures and Grievance procedures apply as normal.
- 7.8** The following information is available on the Housing Executive's website:

[Data Protection](#)  
[Complaints](#)

**7.9** The following information is available for employees on Huddle:

- Data Subject Request Procedure.
- Policy & Procedures for Handling Requests for Personal Data Under UK GDPR & DPA 2018.
- List of Safeguarding/Deputy Safeguarding Officers.
- Freedom of Information Act 2000 Policy & Procedures.
- Staff Guide to Internal Complaints.

If you would like further information or to arrange Safeguarding training, please contact, please email [safeguarding@nihe.gov.uk](mailto:safeguarding@nihe.gov.uk) .

## **Appendix 1: Safeguarding Officers & Deputies**

For an up to date list of current Safeguarding Officers & Deputies email [safeguarding@nihe.gov.uk](mailto:safeguarding@nihe.gov.uk) or search Safeguarding Officers on Huddle.

## Appendix 2: Types of Abuse in Relation to Children

**Physical Abuse** - is deliberately physically hurting a child. It might take a variety of different forms, including hitting, biting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child.

**Sexual Abuse** - occurs when others use and exploit children sexually for their own gratification or gain or the gratification of others. Sexual abuse may involve physical contact, including assault by penetration (for example, rape, or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via e-technology). Sexual abuse is not solely perpetrated by adult males. Women can commit acts of sexual abuse, as can other children.

**Emotional Abuse** - is the persistent emotional maltreatment of a child. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a child's emotional development. Emotional abuse may involve deliberately telling a child that they are worthless, or unloved and inadequate. It may include not giving a child opportunities to express their views, deliberately silencing them, or 'making fun' of what they say or how they communicate. Emotional abuse may involve bullying – including online bullying through social networks, online games or mobile phones – by a child's peers.

**Neglect** - is the failure to provide for a child's basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter that is likely to result in the serious impairment of a child's health or development. Children who are neglected often also suffer from other types of abuse.

**Exploitation** - is the intentional ill-treatment, manipulation or abuse of power and control over a child or young person; to take selfish or unfair advantage of a child or young person or situation, for personal gain. It may manifest itself in many forms such as child labour, slavery, servitude, engagement in criminal activity, begging, benefit or other financial fraud or child trafficking. It extends to the recruitment, transportation, transfer, harbouring or receipt of children for the purpose of exploitation. Exploitation can be sexual in nature.

## Related Definitions

There are related definitions which interface with Child Protection, in particular:

**Domestic violence and abuse** - 'threatening, controlling, coercive behaviour, violence or abuse (psychological, virtual, physical, verbal, sexual, financial or emotional) inflicted on anyone (irrespective of age, ethnicity, religion, gender, gender identity, sexual orientation or any form of disability) by a current or former intimate partner or family member'. Domestic violence and abuse is essentially a pattern of behaviour which is characterised by the exercise of control and the misuse of power by one person over another. It is usually frequent and persistent. It can include violence by a son, daughter, mother, father, husband, wife, life partner or any other person who has a close relationship with the victim. It occurs right across society, regardless of age, gender, race, ethnic or religious group, sexual orientation, wealth, disability or geography.

**Child Sexual Exploitation (CSE)** - occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. The reward might be presents, money, alcohol/drugs, or simply emotional attention. It can happen online or offline, and without the young person being aware of it. CSE usually affects children aged 10 and 18. It might seem like a normal friendship or relationship to begin with and often the child/young person does not see the risk.

Some potential indicators include:

- Unexplained gifts – money, clothes, mobile phone etc.
- Leaving home/care without permission
- Persistently going missing or returning late
- Receiving lots of texts/phone calls prior to leaving
- Returning distraught/dishevelled and/or under the influence of substances
- Truancy from school
- Entering or leaving cars driven by unknown adults or by taxis
- Significantly older 'boyfriend' or 'girlfriend'
- Secretiveness around behaviours
- Concerning use of the internet
- Physical symptoms or infections



- Inappropriate sexualised behaviour for age

**Female Genital Mutilation (FGM)** - involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. FGM is child abuse. It is a criminal offence in Northern Ireland. Possible signs that FGM is about to take place:

- a child may talk about going on a special holiday to a country where the procedure is prevalent (a prolonged period of time away, often at the start of the school holidays)
- a child may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'
- a female family elder visiting from country of origin

Possible signs that FGM may have already taken place:

- child has difficulty walking, sitting or standing
- lengthy absence from school/activities during the day (with bladder or menstrual problems)
- behaviour changes e.g. withdrawal or depression
- seeks to be excused from physical exercises.

**Honour Based Violence (HBV)** - is the term used to refer to a range of violent practices used to control behaviour within families or other social groups to sustain or promote perceived cultural and religious beliefs and/or honour. Such violence may occur when perpetrators perceive that a relative or another has shamed, or may shame, the family and/or community by breaking their 'honour code'. HBV includes assault, abduction, restrictions of liberty, confinement, threats and murder.

**Forced marriage** - is a marriage conducted without the valid consent of one or both parties and where duress is a factor. Forced marriage involving anyone under 18 is child abuse. It cannot be justified on religious or cultural grounds and is a criminal offence in NI. The issue of forced marriage primarily affects girls and young women. However, there are male victims too. The victim may be taken abroad and then forced to marry or brought to the UK as a result of forced marriage to someone living in the UK. Forced marriage is often motivated by a desire to maintain family honour, to maintain and strengthen family and community links or for immigration and citizenship purposes. The force can be emotional or physical.

## Appendix 3: Types of Abuse in Relation to Adults at Risk/in Need of Protection

**Physical abuse** – 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, denial of treatment, misuse or illegal use of restraint and deprivation of liberty.

**Sexual violence and abuse** - ‘any behaviour (physical, psychological, verbal, virtual/online) perceived to be of a sexual nature which is controlling, coercive, exploitative, harmful, or unwanted’.<sup>3</sup> It can take many forms and may include non-contact sexual activities, such as indecent exposure, stalking, grooming, being made to look at or be involved in sexually abusive material, or to watch sexual activities. It may involve physical contact, including non-consensual penetrative sexual activities or non-penetrative sexual activities, such as intentional touching (known as groping). Sexual violence can be found across all sections of society, irrelevant of gender, age, ability, religion, race, ethnicity, personal circumstances, financial background or sexual orientation.

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

**Financial Abuse** - actual or attempted theft, fraud or burglary. It is the misappropriation or misuse of money, property, benefits, material goods or other asset transactions which the person did not or could not consent to, or by intimidation, coercion or deception. This may include exploitation, embezzlement, withholding pension or benefits or pressure exerted around wills, property or inheritance.

**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 reasonable action given the information and facts available to them at the time. It may include physical neglect to the extent that health or well-being is impaired, administering too much or too little medication, failure to provide access to

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<sup>3</sup> The definitions of ‘sexual violence and abuse’ and ‘domestic violence and abuse’ are from “Stopping Domestic and Sexual Violence and Abuse in Northern Ireland, A seven year strategy. March 2016.

appropriate health or social care, withholding the necessities of life, such as adequate nutrition, heating or clothing, or 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.

N.B. The DOH/DOJ Policy does not include self-harm or self-neglect within the definition of an 'adult in need of protection'.

**Institutional Abuse** - the mistreatment or neglect of an adult by a regime or individuals in settings which adults who may be at risk reside in or use. This can occur in any organisation, within and outside Health and Social Care (HSC) provision. 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.

**Exploitation** - 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. It may manifest itself in many forms including slavery, servitude, forced or compulsory labour, domestic violence and abuse, sexual violence and abuse, or human trafficking.

It should be noted that this list of types of harmful conduct is neither exhaustive, nor listed here in any order of priority. There are other indicators which should not be ignored. It is also possible that if a person is being harmed in one way, he/she may very well be experiencing harm in other ways.

### **Related Definitions**

There are related definitions which interface with Adult Safeguarding, each of which have their own associated adult protection processes in place.

**Domestic violence and abuse** - 'threatening, controlling, coercive behaviour, violence or abuse (psychological, virtual, physical, verbal, sexual, financial or emotional) inflicted on anyone (irrespective of age, ethnicity, religion, gender, gender identity, sexual orientation or any form of disability) by a current or former intimate partner or family member'. Domestic violence and abuse is essentially a pattern of behaviour which is characterised by the exercise of control and the misuse of power by one person over another. It is usually frequent and persistent. It can include violence by a son, daughter, mother, father, husband, wife, life partner or any other person who has a close relationship with the victim. It occurs right across society,

regardless of age, gender, race, ethnic or religious group, sexual orientation, wealth, disability or geography.

The response to any adult facing this situation will usually require a referral to specialist services such as Women's Aid or the Men's Advisory Project. In high risk cases a referral will also be made to the Multi- Agency Risk Assessment (MARAC) process. Specialist services will then decide if the case needs to be referred to a HSC Trust for action under the safeguarding procedures. If in doubt, anyone with a concern can ring the Domestic and Sexual Violence helpline (0808 802 1414) to receive advice and guidance about how best to proceed.

**Human Trafficking/Modern Slavery** - involves the acquisition and movement of people by improper means, such as force, threat or deception, for the purposes of exploiting them. It can take many forms, such as domestic servitude, forced criminality, forced labour, sexual exploitation and organ harvesting. Victims of human trafficking/ modern slavery can come from all walks of life; they can be male or female, children or adults, and they may come from migrant or indigenous communities. The response to adults at risk experiencing human trafficking/modern slavery will always be to report the incident to the Police Service.

**Hate Crime** - is any incident which constitutes a criminal offence perceived by the victim or any other person as being motivated by prejudice, discrimination or hate towards a person's actual or perceived race, religious belief, sexual orientation, disability, political opinion or gender identity. The response to adults at risk experiencing hate crime will usually be to report the incident to the Police Service.

## Appendix 4: Guidance on Dealing with Disclosures of Abuse or Safeguarding Concerns

### Dealing with Concerns or Disclosures of Abuse

In cases where a child or adult discloses abuse to an employee they should react appropriately, according to the following guidelines:

#### Do:

- Stay calm.
- Listen to what you are being told and only record the facts. (Ask questions for clarification only - never ask leading questions that suggest a particular answer).
- Express concern and sympathy about what has happened.
- Reassure the child/adult – tell them that s/he did the right thing in telling you.
- Let the child/adult know that the information will be taken seriously and give information about what will happen next.
- If an adult, find an appropriate early opportunity to explain that it is very likely that what they are telling you will need to be shared with others and consider any issues around consent.
  
- Ensure the safety of the person. If urgent medical/police help is required, call the emergency services immediately.
- Record details using the [Safeguarding Reporting System](#) without delay.
- If you do not have access to Safeguarding Reporting System you can contact a member of the Safeguarding Team by phone and they will take the details from you over the phone to avoid any unnecessary delays. They will ask you complete a report at a later date.

#### Do not:

- Stop someone disclosing to you.
- Promise to keep secrets.
- Press the child/adult for more details or make them repeat their story unnecessarily. (as mentioned above ask questions for clarification only - never ask leading questions that suggest a particular answer).
- Gossip about a disclosure or pass on information to anyone who does not have a legitimate need to know.
- Contact the alleged abuser.
- Attempt to investigate yourself.
- Delay.

### Dealing with your own concerns that a Child /Adult is being Abused.

- Always refer if you have a concern, do not investigate yourself, or do nothing.

- Complete a report on the [Safeguarding Reporting System](#) without delay, giving all the details that you are aware of.
- If you do not have access to the [Safeguarding Reporting System](#) you can contact a member of the Safeguarding Team by phone and they will take the details from you over the phone to avoid any unnecessary delays. They will ask you complete a report at a later date.

## Appendix 5: Reporting Procedure Flowchart

