



Church of Ireland
Safeguarding Board

Church of Ireland
ADULT SAFEGUARDING

For Volunteers and Staff

NORTHERN IRELAND

“

IT IS THE POLICY OF THE
CHURCH OF IRELAND
TO SAFEGUARD ALL
ADULTS SHARING IN
ITS MINISTRY AND
TO PROTECT THEM
FROM ALL FORMS OF
HARM AND ABUSE.

”

Section D

DEFINITIONS

The risk of harm occurs in all communities irrespective of age, gender or socio-economic status. Many adults at risk regularly come into contact with our church family and community whether that be through Sunday worship, pastoral visiting, or organisations providing activities for both children and families and individual adults. There are times when those in ministry meet adults at times of crisis and trauma or sometimes they recognise that something is not quite as it appears. A supportive conversation may enable some elements of disclosure of domestic abuse; financial abuse; emotional or other forms of harm. Those in ministry are well placed to support adults at risk and empower them to make choices about how to keep themselves safe by minimising their own exposure to the risks that are present in their lives.

Therefore, it is important that those in ministry understand what constitutes abuse of adults who are at risk of harm. By understanding the nature of abuse and recognizing possible indicators of harm, those in ministry will be in a more informed position to support and guide individuals to seek advice and information to change their circumstances should they wish to do so. While statutory services provide necessary protection responses, community and voluntary sector organisations are also well placed to provide specialist supports to alleged victims of harm and abuse. Likewise, it is important to recognise the value of the spiritual counselling the Church can provide to adults at risk or adults in need of protection in the adult safeguarding process.

Adult Safeguarding; Prevention and Protection in Partnership Policy (NI) (2015) has established the following definitions for practice in the statutory, independent and community and voluntary sectors.

Definition of Abuse

Abuse may be defined as 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 abuse are:

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, denial of treatment, misuse or illegal use of restraint and deprivation of liberty. Female genital mutilation (FGM) is considered a form of physical **AND** sexual abuse.*

Sexual Violence and Abuse

Sexual abuse is any behaviour (physical, psychological, 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).¹ Sexual violence and abuse 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 the production of sexually abusive material, or being made to watch sexual activities. It may involve physical contact, including but not limited to 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, irrespective of gender, age, ability, religion, race, ethnicity, personal circumstances, financial background or sexual orientation.

Psychological/Emotional Abuse

Psychological/emotional abuse is 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, controlling, intimidation and coercion.

Financial Abuse

Financial abuse is 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 which were invalidated by intimidation, coercion or deception. This may include exploitation, embezzlement, withholding pension or benefits or pressure exerted around wills, property or inheritance.

Institutional Abuse

Institutional abuse is 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. 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.

¹ 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.

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 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 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.

Safeguarding Adults: Prevention and Protection in Partnership Policy (NI) (2015) does not include self-harm or self-neglect within the definition of an ‘adult in need of protection’. Each individual set of circumstances will require a professional Health and Social Care assessment to determine the appropriate response and consider if any underlying factors require a protection response. For example, self-harm may be the manifestation of harm which has been perpetrated by a third party and which the adult feels unable to disclose.

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. 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.

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, s/he 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

Domestic violence or abuse is 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 Conference (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

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 PSNI.

Hate Crime

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.

Definition of an Adult at Risk of Harm

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 can become an "adult at risk" at any time in their life and this is not necessarily permanent. This may be due to a permanent or temporary reduction in their physical, mental or emotional capacity brought about by life events, for example bereavement or previous abuse or trauma.

Definition of an 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 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/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).

In most situations HSC Trusts will make decisions regarding the degree of risk and level of harm an adult may be facing and decide on the most appropriate action to take. **If there is a clear and immediate risk of harm, where a crime is alleged or suspected, the matter should be referred directly to the PSNI or HSC Trust Adult Protection Gateway Service and caution should be taken not to touch or disturb possible forensic evidential material.**

Section F

RECOGNISING AND RESPONDING TO ADULT SAFEGUARDING CONCERNS

Bishops, clergy, staff or volunteers who are concerned about someone who may be experiencing harm or abuse must promptly report these to the Diocesan Adult Safeguarding Panel or the Safeguarding Officer (NI).

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

- *They may disclose to you*
- *Someone else may tell you of their concerns or something that causes you concern*
- *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 them makes you feel uncomfortable (this may include a staff member, volunteer, peer or family member)*
- *Through general good neighbourliness and social guardianship*

Being alert to potential abuse plays a major role in ensuring that adults are safeguarded and it is important that all concerns about possible abuse are taken seriously and appropriate action is taken.

Responding to Disclosure of Possible Abuse

In cases where an adult discloses abuse to a bishop, a member of the clergy, member of staff or a volunteer, it is vital that they know how to react appropriately.

All bishops/clergy/staff/volunteers should be made aware of to the following guidelines:

Do

- *Stay calm*
- *Listen attentively*
- *Express concern and acknowledge what is being said*
- *Reassure the person - tell the person that s/he did the right thing in telling you*
- *Let the person know that the information will be taken seriously and provide details about what will happen next, including the limits and boundaries of confidentiality*
- *If urgent medical/police help is required, call the emergency services*

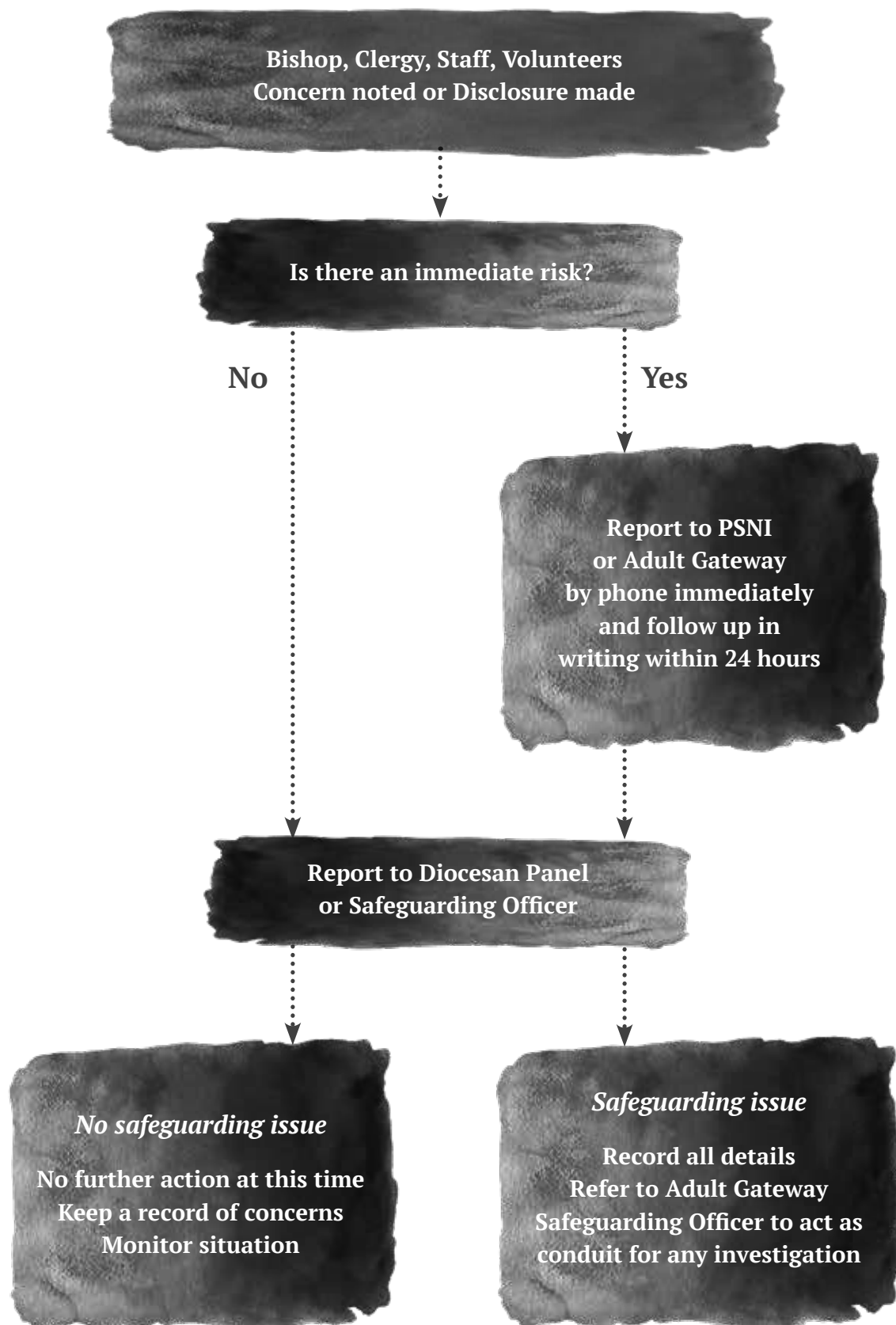
- *Ensure the immediate safety of the person*
- *If you think a crime has occurred be aware that medical and forensic evidence might be needed. Consider the need for a timely referral to the police service and make sure nothing you do will contaminate it*
- *Let the person know that they will be kept involved at every stage*
- *Record in writing (date and sign your report) and report to the person in charge/ Safeguarding Officer at the earliest possible time*
- *Act without delay*

Do not

- *Stop someone disclosing to you*
- *Promise to keep secrets*
- *Press the person for more details or make them repeat the story*
- *Gossip about the disclosure or pass on the information to anyone who does not have a legitimate need to know*
- *Contact the alleged person to have caused the harm*
- *Attempt to investigate yourself*
- *Leave details of your concerns on a voicemail or by email*
- *Delay*

The Diocesan Adult Safeguarding Panel or the Safeguarding Officer (NI) will advise on any immediate action required to ensure the adult at risk of harm is safe and make a decision as to when it is appropriate to speak with the adult at risk of harm about the concerns and any proposed actions. The Diocesan Adult Safeguarding Panel or the Safeguarding Officer (NI) must then report the concerns and any action taken to the social services appointed person (see Section K useful contacts).

Flowchart on reporting an issue



Safeguarding Officer

The role of the Adult Safeguarding Champion (ASC) is set out in Adult Safeguarding: Prevention and Protection in Partnership Policy (NI) (2015). The Church of Ireland is required to appoint an ASC because clergy, paid staff, non-stipendiary staff and volunteers who are leaders of organisations within the Church may be required to complete Access NI checks under Safeguarding Vulnerable Groups (NI) 2007 legislation.

The ASC for the Church of Ireland is the Safeguarding Officer (NI). Contact details for the Safeguarding Officer (NI) can be found on <https://www.ireland.anglican.org/about/safeguarding>

The Safeguarding Officer (NI), with the support of the Church of Ireland Safeguarding Board, provides strategic leadership, advice and oversight in relation to adult safeguarding and is responsible for supporting dioceses in ensuring the implementation of this Code of Good Practice. The Safeguarding Officer (NI) is also the main point of contact with HSC Trusts and the PSNI for all adult safeguarding matters.

The Safeguarding Officer (NI) with the support of the Church of Ireland Safeguarding Board should ensure that the minimum expectations are met within the wider church.

Adult Safeguarding: Prevention and Protection in Partnership Policy (NI) (2015) summarises the key responsibilities for the ASC as follows:

- *to provide information and support for staff on adult safeguarding within the organisation*
- *to ensure that the organisation's adult safeguarding policy is disseminated and support implementation throughout the organisation*
- *to advise within the organisation regarding adult safeguarding training needs*
- *to provide advice to staff or volunteers who have concerns about the signs of harm, and ensure a report is made to HSC Trusts where there is a safeguarding concern*
- *to support staff to ensure that any actions take account of what the adult wishes to achieve - this should not prevent information about any risk of serious harm being passed to the relevant HSC Trust Adult Protection Gateway Service for assessment and decision-making*
- *to establish contact with the HSC Trust Designated Adult Protection Officer (DAPO), PSNI and other agencies as appropriate*
- *to ensure accurate and up to date records are maintained detailing all decisions made, the reasons for those decisions and any actions taken*
- *to compile and analyse records of reported concerns to determine whether a number of low-level concerns are accumulating to become significant; and make records available for inspection*

Diocesan Adult Safeguarding Panel

The panel will be appointed by the Bishop subject to approval by Diocesan Council. This should be composed of a senior cleric plus two others, with at least one lay member. The panel as far as is practical should comprise persons of different gender. The Adult Safeguarding Panel will work closely with the Safeguarding Officer.

According to legislation, the Safeguarding Officer (NI), takes on the role of Adult Safeguarding Champion. The Diocesan Adult Safeguarding Panel take on the roles of ‘appointed persons’. The Adult Safeguarding Panel will receive regular training in the role of appointed persons through the Safeguarding Officer.

Adult safeguarding issues should not go through the Safeguarding Trust Child Protection Parish Panels. All adult safeguarding issues should be referred to the Diocesan Adult Safeguarding Panel.

All reports will need to be made to central Safeguarding Officer (NI).

Any bishop, cleric, staff member or volunteers may make a report to the Diocesan Adult Safeguarding Panel or to the Safeguarding Officer (NI). The Diocesan Safeguarding Panel will then report to the Safeguarding Officer (NI).

Reporting Procedures for Concerns about Adults who may be at Risk of Harm and or in Need of Protection

It is important to remember that the safety and well-being of adults at risk must be the paramount consideration in any incident and such vulnerable individuals or groups should never be put at further risk of harm by delay or inaction. The Church has a responsibility and will pass on safeguarding concerns to the civil authorities even when it does not concern church personnel directly.

1. When a concern is noted the information should be raised with the Diocesan Adult Safeguarding Panel or the Safeguarding Officer **REMEMBER IT IS NOT YOUR ROLE TO INVESTIGATE**. Contact details will be found on relevant Diocesan website and the Church of Ireland website <https://www.ireland.anglican.org/about/safeguarding>
2. *The Safeguarding Officer will determine if the matter should be referred to the HSC Trust and / or the PSNI.*
3. *Arrangements should be in place to ensure that an absence of a delegated person does not delay reporting to HSC Trust or PSNI where there are immediate safety concerns.*
4. *Every safeguarding concern must be taken seriously. The safety and wellbeing of an adult at risk must be paramount in every investigation and it is important that any actions taken or any delay or inaction does not place the adult at risk of further harm.*
5. *It is important that an adult remains in control of their information and where they are able to give informed consent for a referral to be made that this is agreed.*
6. *Whenever a concern is raised and it is possible and practical, take notes during the conversation. Always ask permission to do this and explain the importance of recording all information. Where it is not appropriate to make notes at the time, make a written record as soon as possible afterwards before the end of the day. It is important to sign and date this record.*

7. *Explain to an adult raising a concern what will happen next. Indicate who will be made aware of the information given by them. Leave contact details of the Safeguarding Officer (NI) in case the referrer needs to ask questions later.*

Recording Concerns and Storage of Information

Good record management standards and practices are required for the organisation to ensure confidentiality and that the security of adults' information is respected.

An accurate record should be made of the date and time that the bishop/member of clergy/staff/volunteer became aware of the concerns, the parties who were involved, and any action taken; for example, if first aid was administered. Any questions that bishop/clergy/staff/volunteers ask in 'checking out' the concerns should also be recorded verbatim.

The record should be clear and factual, and recorded at the time or as soon as possible thereafter. Information you have may be valuable to professionals investigating the incident and may at some time in the future be used as evidence in court.

Details of your conversations and actions should be recorded clearly and signed and dated by you.
Information recorded would normally include:

- a. *As much information as possible about the circumstances that led to the concern/allegation being raised; the context of the conversation; any observations; who else was present etc*
- b. *The exact words of the individual who reported the concern; and specifically what the person is worried about and why*
- c. *Any explanation offered to account for the risk, injury or concern*
- d. *Details of any action already taken about the incident/concern/allegation*
- e. *Any views expressed by the individual or their carer(s) about the matter*
- f. *Detail which, to you, may seem irrelevant. It may prove invaluable at a later stage in an investigation*

All original records must be passed immediately to the Safeguarding Officer. Any copies of records retained must be kept secure and confidential.

All records may be needed in legal proceedings if required.

Confidentiality

Any notes or information held must be stored confidentially and in a secure place (including electronic filing) and shared only with those who need to know about the concerns, disclosures, allegations or suspicions of abuse. Further guidance for faith sector organisations on the management of records, confidentiality and sharing of information is available in the GDPR

regulations document on the Church of Ireland Safeguarding website <https://www.ireland.anglican.org/about/safeguarding>²

Consent and Capacity

The focus of any intervention must be on promoting a proportionate, measured approach to balancing the risk of harm with respecting an adult's choices and preferred outcome for their own life circumstances. The right of a person with capacity to make decisions and remain in control of their life must be respected. Consideration of 'capacity' and 'consent' are central to adult safeguarding; for example, in determining the ability of an adult to make lifestyle choices, such as choosing to remain in a situation where they risk being harmed or where they choose to take risks. There should always be a presumption of capacity to make decisions unless there is evidence to suggest otherwise; for example, when in a pastoral role you are aware that an individual has a diagnosis of dementia or a moderate to severe learning disability. However, there are also some circumstances when it may be necessary to consider the protection and rights of others, and overriding the withholding of consent may be necessary to ensure the protection of others. This decision will be made by the statutory services.

It is good practice for those involved in ministry to explain to an adult at risk that they cannot keep a concern a secret and that there are agencies and organisations that are able to provide the adult with advice and support. Adults should be encouraged to agree with you having a conversation with the Safeguarding Officer to begin to offer support in a meaningful and respectful way that is cognisant of how they want to deal with their situation.

Where an adult who has capacity to make decisions refuses to give permission to report the concern it is important that this is noted and respected. The adult should be informed that their views are important and will be considered but that it is a pastoral responsibility to discuss the matter with the Safeguarding Officer to ensure the safety and wellbeing of others. This may include allegations of a criminal nature which must be reported to PSNI and/or HSC Trusts.

Raising a Concern about someone in a Position of Trust in the Church - this includes all Clergy, Staff and Volunteers

All organisations that provide services for, or work with, adults at risk must have appropriate whistle-blowing procedures, and a culture that enables safeguarding concerns and allegations to be addressed. There should be particular awareness that the welfare of adults at risk is paramount. Whistle-blowing as part of the safeguarding procedures is intended to encourage and enable anyone with a serious concern, to raise that concern.

People who work within the Church of Ireland, including but not limited to office holders, bishops, clergy, staff or volunteers, may find it difficult to speak out and raise their concerns as they may

² 'Safeguarding Vulnerable Adults: A Shared Responsibility' can be accessed at:
<http://www.volunteernow.co.uk/fs/doc/publications/vn-sva-web-full-colour.pdf>

feel they are being disloyal to their colleagues or to the Church. They may also fear harassment or victimisation. Whistle-blowers are protected by law from victimisation, subsequent discrimination or disadvantage provided the matter in question is raised with genuine concern. The Public Interest Disclosure Act 1998 (NI) gives workers legal protection against being dismissed or penalized as a result of publicly disclosing certain serious concerns. The policy extends this protection to volunteers.

It is important that an individual raising concerns puts their name to an allegation and does not raise it anonymously. Where concerns are expressed anonymously they will be considered, however, they are much less powerful and far more difficult to investigate and prove. Concerns can be raised in confidence. At the appropriate time, however, a whistle-blower may be approached to come forward as a witness, in order to bring the matter to a conclusion.

If an individual has any concerns that someone within the church is engaged in activities or behaviour that is contrary to any part of these safeguarding policies they should, in the first instance, contact the Safeguarding Officer (NI) or the Diocesan Adult Safeguarding Panel.

If an individual feels unable to contact the Safeguarding Officer (NI) or the allegation involves this person, then advice should be sought from the Bishop of the Diocese.

If an individual feels unable to contact a member of the Church of Ireland they can go directly to the Gateway Service in the relevant Health and Social Care Trust.

Concerns may be raised verbally in the first instance, however, this should be followed up in writing stating the history of the concern and providing as much detail as possible including any supporting evidence.

The earlier concerns are raised the easier it is to take action.

Whistleblowing

The Adult Safeguarding Policy runs in conjunction with the Church of Ireland Dignity in Church Life Charter, Safeguarding Trust for working with Children and all other Representative Church Body policies:

- *The Church of Ireland is committed to the highest possible standards of conduct, openness, honesty and accountability*
- *The Church of Ireland takes poor practice or malpractice seriously, giving examples of the types of concerns to be raised, to ensure that a whistleblowing concern is clearly distinguished from a grievance*
- *Bishops, clergy, staff or volunteers have the option to raise concerns outside of line management structures*
- *Staff or volunteers are enabled to access confidential advice from an independent source*
- *The Church of Ireland will, where possible, respect the confidentiality of a bishop, member of clergy, staff or volunteer raising a concern through the whistleblowing procedure*

- *It is a disciplinary matter both to victimise a bona fide whistleblower and for someone to maliciously make a false allegation*

There may be situations in which concerns or allegations turn out to be unfounded. It is important that everyone in the organisation knows that if they raise a concern which, through the process of investigation, is not validated, they have not in any way been wrong in their initial action. Responsible action needs to be encouraged in the organisation and whistleblowers should be confident of support. The whistle-blowing policy needs to be regularly reviewed to ensure procedures work in practice. It is everyone's duty to be vigilant in preventing abusive practice.

How the Church will Respond

The Church of Ireland gives an undertaking to minimise any risk to an individual raising a concern in good faith and will support them in doing so. It will not tolerate victimisation, intimidation or negative repercussion of anyone raising a concern in good faith and will take action.

Section G

RISK ASSESSMENT

A risk assessment of all activities involving adults who are potentially at risk must be carried out on an annual basis by the Select Vestry of every Parish.

Activities that would require a risk assessment include the following (this is no way an exhaustive list but gives an indication of the types of activities involved):

- *Church services*
- *Pastoral visiting*
- *Lunch clubs*
- *Bowling club*
- *Mothers' Union*

Further risk assessments are required for one-off events, such as a summer fair, or external visits such as a cinema trip.

Risk assessments for all activities must be completed in writing and kept with other Safeguarding documents so they can be available when required.

All incidents and accidents must be recorded in writing. All leaders of groups must be aware of where the incident/accident record is stored and how they can access it when required.

Section H

COMPLAINTS

The Church of Ireland has an ethos of inclusion, transparency and openness.

Anyone who has an issue relating to the Church of Ireland in connection with Adult Safeguarding can raise an enquiry or complaint through the Safeguarding Officer or if it is about them then through the Representative Church Body (www.ireland.anglican.org). Any complaints regarding bishops or clergy in the context of adult safeguarding will be referred to the Complaints Administrator. This will then trigger the complaints procedure as laid out in the Constitution of the Church of Ireland. Should the complaint require further investigation the Complaints Committee will sit to consider the matter.

The Church of Ireland Dignity in Church Life Charter also outlines the support available to anyone who wishes to complain about a matter relating to the Church of Ireland.

All leaders-in-charge, volunteers and participants should be made aware of the complaints procedure either through the parish magazine/website or a notice clearly displayed in the church and church Halls.

Section I

RECORD KEEPING

Confidentiality

Some information should only be shared on a need-to-know basis. It is important to have a clear written statement on confidentiality, when information must be passed on, why and to whom.

A confidentiality policy should be written and include reference to:

- *What information is needed from participants*
- *Storage of information*
- *Access to information*
- *Length of time information is kept*
- *Procedure/guidelines for appropriate sharing of information*

Record Keeping

The following categories of records should be kept with Data Protection guidelines:

Staff or Volunteers

- *All details provided at the time of recruitment*
- *Any record of complaints or incidents involving staff or volunteers*
- *A record that all vetting has been carried out and all relevant checks have been completed*

Adults at Risk

- *Membership registration form including medical details, any special needs*
- *Emergency contact numbers or numbers of nearest relative or person*

Organisation

- *Attendance register, including staff and volunteers' attendances*
- *Accident book*
- *Incident book*

It is important that all staff and volunteers are aware of and follow a written procedure for record keeping. There should also be an agreed procedure for lodging records for permanent filing in a secured filing cabinet.

Adults must be able to access information held about them at any time and they must be aware of this.

Records must be kept in accordance with the Church of Ireland GDPR Policy.

Section J

PROMOTING SAFER PRACTICE WHEN WORKING WITH ADULTS AT RISK

This policy statement and the good practice guidelines are designed for all members of the Church who have some responsibility for the pastoral care of others. It is intended to help the Church community understand the needs of adults at risk to help improve pastoral care.

The way we behave in the Church is often implied through our faith and values but there may be a need to discuss behaviour with a group and agree what is acceptable and what is not acceptable. This agreement must comply with the code of behaviour below.

Code of Behaviour when working with Adults at Risk *(This code must be given to all bishops, clergy, staff and volunteers.)*

Bishops, clergy, staff and volunteers should avoid:

- *Spending excessive amounts of time alone with an adult at risk*
- *Taking an adult at risk to your own home*
- *Taking an adult at risk alone on a car journey, unless part of core activities*

Bishops, clergy, staff and volunteers should never engage in any of the following behaviours:

- *Abuse, neglect or harm an adult*
- *Rough physical games*
- *Sexually provocative games*
- *Inappropriate comments/jokes*
- *Form inappropriate relationships*
- *Discriminate against individuals and their families who have different cultural backgrounds and beliefs from their own*
- *Take a photograph or video, including by mobile phone, without consent*

Bishops, clergy, staff and volunteers should ensure that:

- *Physical contact is person-centred and appropriate to the task required*
- *They understand and support the implementation of a care plan by relevant health professionals, where required*
- *They do not provide intimate care unless in an emergency, if required it is done sensitively and with respect for the individual's dignity and privacy*
- *They involve the individual as far as possible in his/her own care*
- *If they are concerned about anything during care, they report it at the earliest opportunity*

Bishops, clergy, staff and volunteers should:

- *Never deny an adult access to his/her money*
- *Never borrow money from, or lend money to, an adult you are working with or caring for*
- *Report any suspicions of financial abuse*
- *Not photograph/video an adult, even by mobile phone, without the adult's valid consent*
- *Ensure that any photographs/videos taken are appropriate*
- *Report any inappropriate use of image*
- *Report any inappropriate or dangerous behaviour on the internet that involves an adult at risk*

It is important that adults at risk are made aware of the dangers associated with new technology, such as social networking sites and the internet, and know to tell someone if they encounter anything that makes them feel unsafe or threatened.

Bishops, clergy, staff and volunteers should:

- *Ensure they are familiar with the Church of Ireland's safeguarding policy*
- *Set an example they would wish others to follow*
- *Always respect the person and all their abilities and treat each person with dignity and respect promoting an environment that enhances disclosure*
- *Not make assumptions; for example, that you know the family and there must be more to it*
- *Be respectful when visiting people, taking care to knock before entering a building or a room and being conscious of length of visits. There may be individual occasions where you may decide that a lone visit is not appropriate and in such circumstances it is recommended that the adult or their carer as necessary is notified in advance of the visit and appropriate arrangements are put in place for a family member to be present or a colleague to visit with you*
- *Remember that an adult at risk is still an adult and must never be treated like a child. The choices that an individual makes should be recognised even if they appear risky and they must never be forced or coerced to participate in an activity. It is important to ensure that the choices offered to individuals are fully understood by them*
- *Empower adults at risk to safeguard themselves. They should be listened to, believed, given relevant advice and information and always involved in decisions that affect them as far as it possible*
- *Provide help in such a way as to maximize a person's independence. People with additional needs can and do lead active and fulfilled lives but some may need support and resources to do so. Respect a person's independence and do not encourage them to become dependent on you*
- *Not partake in pastoral care which is beyond an individual's responsibility and/or competence*
- ***Decline to deal with an individual's financial affairs unless legally required to do so***
- ***Not accept material or financial gifts. If it would upset or offend someone for the gift to be refused then the Safeguarding Officer should be informed as soon as possible. This will avoid any accusation or confusion later***
- *Be mindful of the language used, tone of voice, and body language. Positive and appropriate language should be used at all times and if necessary, advice should be sought when the person has specific communication needs*

- *Use touch appropriately and respect an individual's boundaries. Touch can be a way of communicating affection, warmth and comfort. It should be appropriate and generally initiated by the adult and related to their needs*
- *Be mindful of the safety of adults at risk but also of your own safety and protect yourself from allegations of inappropriate behaviour. Behaviour should be open, transparent and accountable. Be aware that however well-intentioned someone's actions are, they may be misinterpreted by others*
- *Afford adults at risk the highest level of privacy and confidentiality possible in the circumstances however promises to keep secrets should not be made*
- *Take care in selecting an appropriate location and setting of a discussion. Offering appropriate care and support is important so, in listening to a person's problem or offering advice, where possible, other leaders should be made aware of the meeting and other people should be around*
- *Avoid situations within a relationship of trust which could compromise that relationship*
- *Never trivialise abuse or dismiss worries. Allegations and concerns about abuse must be taken seriously. Careful notes should be written of what has been seen or heard and it should be reported straight away*
- *Recognise, record, report; never be afraid to ask for help and advice from your leaders or more experienced staff. The Safeguarding Officer is available to give consultation and advice*

Breaching the Code

Bishops, clergy, staff and volunteers should understand that:

- *If they are unsure of their actions and feel they may have breached the Code, they should consult with their Incumbent, Leader in Charge, Diocesan Adult Safeguarding Panel or the Safeguarding Officer, as relevant*
- *Breaching the Code is a serious issue that will be investigated by the appropriate Church authority*
- *Breaching the Code may result in Church disciplinary action and ultimately dismissal and if it constitutes harm/risk of harm*

Section K **USEFUL CONTACTS**

HSC Trust Adult Safeguarding Contact Details NI

	<i>Normal Working Hours 9am-5pm</i>	<i>Out of Hours Emergency Service</i>
Belfast	028 9504 1744	028 9504 9999
Northern	028 9441 3659	028 9504 9999
South Eastern	028 9250 1227	028 9504 9999
Southern	028 3756 4423	028 9504 9999
Western	028 7161 1366	028 9504 9999

References

Achieving Best Evidence in Criminal Proceedings: Guidance on interviewing victims and witnesses, the use of special measures and the provision of pre-trial therapy. Department of Justice (2012).

Action on Elder Abuse: definition of abuse 1993 which can be accessed at:
<http://www.elderabuse.org.uk/Mainpages/Abuse/abuse.html>

This was later adopted by the World Health Organisation: http://www.who.int/ageing/projects/elder_abuse/en/

Adult Safeguarding: Prevention and Protection in Partnership Policy
 Department of Health Social Services and Public Safety and Department of Justice (2015).

Northern Ireland Adult Safeguarding Partnership Training Framework NIASP (2016).

Protocol for Joint Investigation of Adult Safeguarding Cases NIASP (2016).

'Keeping Adults Safe: A Shared Responsibility' can be accessed at: <http://www.volunteernow.co.uk/>

Stopping Domestic and Sexual Violence and Abuse in Northern Ireland: A Seven Year Strategy
 Department of Health and Department of Justice (2016).

The European Convention on Human Rights can be accessed at: http://www.echr.coe.int/Documents/Convention_ENG.pdf

The Human Rights Act 1998 can be accessed at: <http://www.legislation.gov.uk/ukpga/1998/42/contents>

Relevant Conventions include The *UN Convention on the Rights of Persons with Disabilities*, the *UN Convention on the Elimination of Discrimination Against Women* (CEDAW), and the *EU Istanbul Convention* on domestic and sexual violence against women.

The *UN Principles for Older Person's (1991)* can be accessed at: <http://www.un.org/documents/ga/res/46/a46r091.htm>

Safeguarding Vulnerable Persons at Risk of Abuse - National Policy and Procedures (2014, HSE).