

VULNERABLE ADULTS PROTECTION POLICY

INTRODUCTION

Action on Alzheimer's & Dementia (hereafter known as "AAD") serves persons living with a diagnosis of dementia or cognitive decline and provides support to their care partners, both formal and informal. Those with a diagnosis of dementia or cognitive decline are considered 'vulnerable adults', as they may have difficulty communicating, making informed and rational decisions, and may rely on others to provide personal care and general support for daily living. As a result these persons are open to all forms of abuse and will be considered and referred to in this Policy as "vulnerable adults".

It is further noted the term "associates" as used in this document includes the following: any AAD board member, volunteers, any paid contractor working in a capacity for AAD, or care partners for persons with dementia, attending AAD activities.

"Most responsible adult" as used herein is defined in hierarchal order as the a) Power of Attorney for Health Care b) Family/Friend identified by the competent patient c) Next of Kin d) formal care partner (if any)

AAD has adopted the following policy and procedures for several reasons, including to:

- Safeguard from physical or emotional harm by our associates at our community activities/events.
- To assure the vulnerable adult is safe at AAD organized events.
- Raise awareness amongst all of our associates such that they know what to do if they are concerned about a vulnerable adult, whether the concern relates to: the person's welfare at AAD events or something happening outside of AAD that a vulnerable adult discloses to someone they trust within AAD
- Protect associates by giving them some practical, common sense guidelines to avoid placing themselves in situations where they are open to allegations which could seriously damage their lives and careers.
- Protect AAD, by showing that we have taken 'all reasonable steps' to provide a safe environment.

AAD has taken the following steps:

1. Adopted a policy statement that defines AAD's commitment to providing a safe environment for vulnerable adults
2. Produced a simple code of practice and procedures governing how AAD operates.

This covers the:

- Safe recruitment of associates who will be in contact with vulnerable adults.
- Good practice guidelines to ensure the safety and welfare of vulnerable adults at all times whilst at AAD organized events.
- Handling of concerns, reports or allegations.

Action on Alzheimer's & Dementia informs new associates of this policy at the point of onboarding and existing associates annually. All AAD associates have access to this policy and supporting procedures through the website and other means. AAD requires those with direct contact with vulnerable persons to be familiar with AAD policy and procedures.

Abuse is defined as actions to deliberately annoy, bother, cause trouble or touch someone without his or her consent. Actions may be considered abusive if they intentionally cause injury or a series of injuries, are neglectful, sexually molest and/or emotionally abuse another person. Abuse falls into four main categories; (a) physical, (b) neglect, (c) emotional or verbal, and (d) sexual.

SAFEGUARDING VULNERABLE ADULTS PROTECTION POLICY STATEMENT

It is the policy of AAD to reasonably safeguard vulnerable adults taking part in AAD events from all forms of harm. AAD will take all reasonable steps to ensure that, through appropriate procedures and training, those participating in AAD activities do so in a safe environment. We recognize that the safety and welfare of the vulnerable adult population is paramount and that all vulnerable adults, irrespective of sex, age, disability, race, religion or belief; sexual identity or social status, have a right to protection from abuse.

STAFF AND VOLUNTEERS

AAD requires criminal background check for AAD associates serving in positions involving training or supervising vulnerable adults or in positions of trust or authority over vulnerable adult's welfare.

GOOD PRACTICE GUIDELINES (SEE ALSO APPENDIX B BELOW)

It is important to develop a culture within AAD where both vulnerable adults and associates feel able to raise concerns, knowing that they will be taken seriously, treated confidentially and will not make the situation worse for themselves or others.

Some vulnerable adults may be more vulnerable to abuse or find it more difficult to express their concerns. For example, a disabled child who relies on a caregiver to help them do things or get around may worry that they won't be able to attend events any more if they report the caregiver. A vulnerable adult may not be able to express themselves or speak confidentially if they need an interpreter. A vulnerable adult who has experienced racism may find it difficult to trust an associate from a different ethnic background.

AAD will promote good practices to minimize situations where adults are working unobserved or could take advantage of their position of trust. Good practice protects everyone — vulnerable adults and associates. These common sense guidelines are made available to everyone by being posted on our website www.alzbermuda.com

This following only covers the essential points of good practice when working with vulnerable adults.

- Avoid spending any significant time working with the vulnerable person in isolation without the knowledge of the most responsible adult.
- Do not take vulnerable adults to your home as part of your organization's activity.
- Do not accept money or assist in the withdrawal of money from a vulnerable adult's bank.
- Allow or engage in inappropriate touching of any form
- Use inappropriate language with vulnerable adults
- Make sexually suggestive comments to a vulnerable adult, even in fun
- Fail to respond to an allegation made by a vulnerable adult
- It may sometimes be necessary to do things of a personal nature for a vulnerable adult. These tasks should only be carried out with the full understanding and consent of the adult (where possible) and the most responsible adult. In an emergency situation which requires this type of help, care partners should be informed as soon as possible. In such situations it is important to ensure that any adult present is sensitive to the vulnerable adult and undertakes personal care tasks with the utmost discretion and respect.

One should never:

- Engage in sexually provocative games
- Allow or engage in inappropriate touching of any form
- Use inappropriate language when interacting with persons living with dementia
- Make sexually suggestive comments to a person living with dementia even in fun
- Fail to respond to an allegation made by a person living with dementia; always act
- Do things of a personal nature that a person living with dementia can do for themselves.

CONCERNS

Anyone who is concerned about an individual living with dementia, either at one of our activities program or at home or a residential home, should inform a member of the AAD Board immediately, in strict confidence. The AAD Board will follow the attached procedures.

Any associate failing to comply with this Safeguarding policy and any relevant Codes of Conduct may be subject to disciplinary action.

SAFEGUARDING TRAINING

AAD will ensure that all associates working with those living with dementia have undertaken training appropriate to their role. This may be through formal training or an online course.

Training will be required on an annual basis for those roles that involve regularly training or supervising persons living with dementia or is a position of trust or authority over the vulnerable adult's welfare and will address the following:

- What abuse is and how to spot abuse
- Reporting requirements and procedures
- What "duty of care" means and how AAD fulfils that requirement
- How client confidentiality of vulnerable persons is addressed

HANDLING CONCERNS, REPORTS OR ALLEGATIONS

A complaint, concern or allegation may come from a number of sources: the vulnerable adult, their family or care partner, or someone else within AAD. It may involve the behavior of a volunteer or employee, or something that has happened to the person outside of the charity programs, perhaps at home or at another location. The vulnerable adult may confide in associates they trust, in a place where they feel at ease.

An allegation may range from mild verbal bullying to physical or sexual abuse. If you are concerned that a vulnerable adult may be being abused, it is not your responsibility to investigate further but it is your responsibility to act on your concerns and report them to the appropriate statutory authorities. For guidance on recognizing abuse, see Appendix B.

HANDLING AN ALLEGATION FROM A VULNERABLE ADULT

People with dementia can be more vulnerable to abuse as they may struggle to discuss their feelings and experiences or remember what happened to them. Dementia can also make it harder to detect abuse

Always:

- Stay calm, ensure that the vulnerable adult is safe and feels safe
- Show and tell the vulnerable adult you are taking what he/she says seriously
- Reassure the vulnerable adult and stress that he/she is not to blame
- Be careful about physical contact, it may not be what the vulnerable adult wants
- Be honest, explain that you will have to tell someone else to help stop the alleged abuse
- Make a record of what the vulnerable adult has said as soon as possible after the event, using the vulnerable adult's own words
- Follow the vulnerable adult protection procedures laid out in this policy

- If the person is able to communicate in a meaningful way, follow the general communication principles we advise. Things like:-
 - Minimize other distractions
 - Approach from the front & at the person's eye level
 - Speak slowly and clearly
 - Maintain eye contact
 - Use short, simple sentences
 - Keep your tone of voice calm and friendly
 - Give the individual plenty of time to respond
 - Avoid asking too many questions
 - Simplify decisions the individual needs to make i.e. 'Have they been treating you well here?' 'Has anyone hurt or upset you?'
 - Use physical contact such as holding the individual's hand or putting your arm around them to demonstrate affection. Watch the individual's body language to ensure they are comfortable with this.

Never:

- Rush into actions that may be inappropriate
- Make promises you cannot keep (e.g. You won't tell anyone)
- Take sole responsibility — consult someone else (ideally an AAD director/Compliance officer) so that you can begin to protect the vulnerable adult and gain support for yourself

You may be upset about what the vulnerable adult has said or you may worry about the consequences of your actions. However, one thing is certain you must act and not ignore it.

RECORDING AND HANDLING INFORMATION

If you suspect that a vulnerable adult may have been the subject of any form of physical, emotional or sexual abuse or neglect, refer the allegation to the Registrar of Abuse, Ageing and Disability office at the Ministry of Health and the Police within 24 hours. It is their duty to handle the situation correctly and appropriately within the requirements of the law.

Listen to and keep a record of anything the vulnerable adults tells you or that you have observed and pass the information on to the statutory authorities (included in Supporting Documents).

All information must be treated as confidential and only shared with those who need to know. The protection of the vulnerable person is the most important consideration.

If the allegation or suspicion concerns someone within AAD, only the vulnerable adult's most responsible adult, another AAD Board member, the relevant authorities should be informed. If the alleged abuse took place outside an AAD event, the Police or Ageing and Disability Services will decide who else needs to be informed, including the vulnerable adult's most responsible adult. It

should not be discussed by anyone within the organization other than the person who received or initiated the allegation and, if different, the AAD Director/Compliance Officer.

Confidential information must be stored securely. It is recommended that it should be retained for at least 7 years and destroyed by secure means.

CO-OPERATION WITH AUTHORITIES

If AAD is contacted by the Police or another stakeholder concerning information received or a complaint made by or about an associate, you are advised to co-operate fully with official requests for factual information, but do not express any personal opinions on the person's conduct. See also 'Handling the Media' below.

REFERRAL TO AUTHORITIES

If AAD permanently dismisses or removes an associate from involvement with AAD activities, or would have dismissed them if they had not resigned, because they have harmed a vulnerable person or placed them at risk of harm, AAD will refer them to Ageing and Disabilities office at the Ministry of Health, and/or the Bermuda Police Service, and/or other stakeholders as appropriate.

HANDLING THE MEDIA

If there is an incident which attracts media interest, or if you are contacted by the media with an allegation concerning an associate, do not respond and contact an AAD Board member immediately.

REPORTING PROCEDURES

If you are uncertain what to do at any stage, contact an AAD member.

1. Ensure that the is safe
2. If the vulnerable adult requires immediate medical attention call ambulance and inform attendants there is a vulnerable adult protection concern
3. Make a record of anything the vulnerable adult has said and/or what has been observed, if possible with dates and times
4. Report your concern by submitting a Referral Form (included in Supporting Documents) as soon as possible to an AAD Board member.
5. The AAD Board will decide on the appropriate action to be taken
 - a. If the alleged is a minor poor practice, determine disciplinary procedure, including possible temporary suspension
 - b. If the alleged is serious poor practice or alleged vulnerable adult abuse, contact the Police
6. The AAD board member will report any vulnerable adult protection issues to the Executive and will securely store a copy of the incident report for a minimum of seven years.

USEFUL CONTACTS

Local Resources 911 — if in immediate danger or for the Sexual Assault Response Team

Bermuda Police Service

441-295-0011 or 441-247-1678

www.bps.bm

Ageing and Disabilities Services

Ministry of Health

Ja-Mae Smith

jmlsmith@gov.bm

441 278 6527

Registrar of Abuse

Keeona Belboda

ads@gov.bm

<https://www.gov.bm/senior-abuse-reporting-and-investigation>

Child and Family Services

441-278-9111 or 441-294-5882

Bermuda Islands Association of the Deaf

441-238-8116

Centre Against Abuse Women's Hotline

441-297-8278

www.abusefree.org

Centre Against Abuse Men's Hotline

441-332-1293

www.abusefree.org

Family Centre

441-232-1116

www.tfc.bm

Mid Atlantic Wellness Institute

441-236-3770

Women's Resource Centre

441-295-3882 (main)

441-7273 (hotline)

www.wrcbermuda.com



To: Board of AAD alzbermuda@yahoo.com
From: Insert name of author
Date: July 18, 2018
Re: Safeguarding and Protection Referral

Insert date and time of incident:

Insert Name and position of person about whom report, complaint or allegation is made:

Insert Name and age of vulnerable person involved:

Insert Nature of incident, complaint or allegation (continue on separate page if necessary).

Insert Action taken (continue on separate page necessary)

Insert if Police or another stakeholder contacted, including name, position and telephone number of person handling case:

Insert Name, organization and position of person completing form

Contact phone number

THIS MEMO SHOULD BE SENT, MARKED 'PRIVATE AND CONFIDENTIAL', TO AN AAD BOARD MEMBER AND TO THE STATUTORY AUTHORITIES (IF THEY HAVE BEEN INFORMED OF THE INCIDENT) AS SOON AS PRACTICABLE.

APPENDIX A: WHAT IS VULNERABLE ADULT ABUSE?

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a vulnerable adult by inflicting harm, or by failing to act to prevent harm. Vulnerable adults may be abused in a family or in an institutional or community setting by those known to them or by others (including professionals). They may be abused by other adult in a care home or home setting. Physical abuse may involve adults inflicting physical harm which includes but is not limited to the following:

- Hitting, Shaking, grabbing forcefully, throwing, poisoning, burning or scalding, drowning or suffocating
- Inappropriate use of pharmacological drugs
- Inappropriate use of physical restraints & false imprisonment
- Neglect in the care of the adult

Emotional abuse is the persistent emotional maltreatment of a vulnerable adult such as to cause severe and persistent adverse effects on the vulnerable adult's emotional well-being. It may include but is not limited to the following:

- Conveying to a vulnerable adult that they are worthless, unloved or inadequate
- Not giving the vulnerable adult opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Imposing overprotection, or prevention of the adult from participating in normal social interaction
- Allowing a vulnerable adult to see or hear the ill-treatment of another person
- Serious bullying (including cyber bullying), causing the vulnerable adult to frequently feel frightened or in danger
- The exploitation or corruption of a vulnerable adult.
- Emotional abuse might also include situations where care partners subject a vulnerable person to constant criticism, bullying or pressure to perform at a level that cannot realistically be expected to achieve.

Some level of emotional abuse is involved in all types of maltreatment of a vulnerable adult.

Bullying may be seen as deliberately hurtful behavior, usually repeated or sustained over a period of time, where it is difficult for those being bullied to defend themselves.

Although anyone can be the target of bullying, victims are typically shy, sensitive and perhaps anxious or insecure. Sometimes they are singled out for physical reasons — being overweight, physically small, having a disability or belonging to a different race, faith or culture.

The acronym STOP — Several Times On Purpose - can help you to identify bullying behavior.

Sexual abuse involves an individual (male or female) forcing or enticing a vulnerable adult to take part in sexual activities, whether or not the person is aware of what is happening, to gratify their own sexual needs. The activities may involve:

- Physical contact (e.g. Kissing, touching, masturbation, rape or oral sex)
- Involving the vulnerable adult in looking at, or in the production of, sexual images
- Encouraging the vulnerable adult to behave in sexually inappropriate ways or watch sexual activities
- Abusive situations may occur if adults in a position of trust misuse their power over vulnerable persons.

Financial exploitation is the unauthorized and improper use of funds, property or any resources of a vulnerable adult including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions; or the misuse or misappropriation of property, possessions or benefits.

Neglect is the persistent failure to meet a vulnerable adult's basic physical and/or psychological needs, likely to result in the pain of suffering. Neglect may involve another adult (including family members or care partner (formal or informal)) or residential home:-

- Failing to provide necessities of life, such as adequate nutrition, shelter, medication or heating
- Failing to protect a vulnerable adult from physical and emotional harm or danger
- Failing to provide access to appropriate health or social care
- Failing to respond to a vulnerable adult's basic emotional needs

RECOGNISING ABUSE

It is not always easy, even for the most experienced caregivers, to spot when a vulnerable adult has been abused. However, some of the more typical symptoms which should trigger your suspicions would include:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries.
- A sudden change in behavior (e.g. becoming very quiet, withdrawn or displaying sudden outbursts of temper).
- The vulnerable adult describes what appears to be an abusive act involving him/her
- A change observed over a long period of time (e.g. The vulnerable adult losing weight or becoming increasingly dirty or unkempt)
- A general distrust or avoidance of other adults, especially those with whom a close relationship would be expected.
- An unexpected reaction to normal physical contact.

- Abnormal restrictions on socializing with others being imposed by care partners.

It is important to note that a vulnerable adult could be displaying some or all of these signs, or behaving in a way which is worrying, without this necessarily meaning that the person is being abused. Similarly, there may not be any signs, but you may just feel that something is wrong. If you have noticed a change in the vulnerable adult's behavior, first talk to the most responsible adult. It may be that something has happened, such as a bereavement, which has caused the adult to be unhappy.

IF YOU ARE CONCERNED

If there are concerns about sexual abuse or violence in the home, talking to the parents or caregivers might put the child at greater risk. If you cannot talk to a family member or the caregivers, consult an AAD Board member which may or may not include the Compliance Officer. It is this person's responsibility to make the decision to contact the Registrar of Abuse, Ageing and Disabilities and the Police. It is NOT their responsibility to decide if abuse is taking place, BUT it is their responsibility to act on your concerns.

MANDATORY REPORTING UNDER THE SENIOR ABUSE ACT 2008

(NB: Senior defined as "a person 65 years and older")

It is mandatory for any person who knows or has reasonable grounds to suspect a senior is being abused, or is at significant risk of abuse, to make a report to the Registrar of Abuse

The following professionals must report whether or not the information is confidential or privileged: Healthcare professionals, counsellors, social workers, care workers, clergy, police officers, management of a hospital, home or other facility that provides care to seniors.

GOOD PRACTICE GUIDELINES – APPENDIX B

Guidelines

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Insert Date [within 2 working days of alleged incident]

The Registrar General

The Registry General's Office
Government Administration Building
1st Floor
30 Parliament Street
Hamilton HM12

Dear Registrar:

REPORTING FOR VULNERABLE PERSONS

Action on Alzheimer's & Dementia ("AAD") hereby notifies the office of the Registrar General and the Charity Commissioners that we have reported an allegation of [insert description] of a vulnerable [senior, vulnerable adult or person who is physically challenged etc.] to the following agency(ies):-

- Department of Child & Family Services
- Ageing and Disability services (Ministry of Health)
- Bermuda Police Service
- Registrar of Abuse (Keeona Belboda)
- Other, please specify: _____

This action is in compliance with AAD's Vulnerable Person Policy.

Total Reports during this fiscal year:

Total Reports Substantiated during this fiscal year:

Total Reports Un-Substantiated during this fiscal year:

Insert name of reporter

Signature of reporter

Insert date of signature

Insert name of Director

Signature of Director

Insert date of signature