



Name of Policy / Procedure	Adult Safeguarding Policy
Name of Originator / Author	Joanna Clarke, Head of Quality, Compliance and Learning
Name of Responsible Division	Quality, Compliance and Learning
Ratified By	Senior Leadership Team (SLT)
Circulated to	All staff
Date of Issue	November 2025
Review Date	November 2027

Section	Title	Page Number
1.0	Policy Statement	3
2.0	Scope	4
3.0	Purpose	4
4.0	Objectives	4
5.0	What is safeguarding?	5
6.0	Definitions	5
7.0	Risk Assessment	7
8.0	Adult Protection Gateway Team	7
9.0	Governance	8
10.0	Adult Safeguarding Champion	8
11.0	Capacity and Consent	9
12.0	Duty of Candour	9
13.0	Support	11
14.0	Responsibilities to those alleged to have caused harm	11
15.0	Contracting External Services	12

16.0	Other Relevant Policies and Guidance	12
17.0	Named Adult Safeguarding Champions	12
Appendix 1	Relevant Legislation	13

1.0 Policy Statement

1.1 Safeguarding is a key priority that reflects Threshold's focus on human rights and the requirement within Northern Ireland's legislative framework and regional policies to have regard to the need to protect and promote the rights of people who use our services. Relevant legislation and regional policies include:

- Safeguarding Vulnerable Groups (NI) Order 2007 (as amended by the Protection of freedoms Act 2012)
- Adult Safeguarding: Prevention and Protection in Partnership: July 2015. DHSSPS & DOJ
- Adult Safeguarding Partnership's "Operational Procedures for Adults at Risk of Harm and Adults in Need of Protection" (September 2016)

1.2 Threshold has a zero-tolerance approach to the abuse, harm or exploitation of adults. We will work in partnership with organisations such as the PSNI and the DHSSPS to prevent harm to adults caused by abuse, exploitation or neglect and will work in partnership to protect those adults who are assessed as in need of protection.

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

- recognising that adult harm is wrong and that it should not be tolerated
- being aware of the signs of harm from abuse, exploitation and neglect
- reducing opportunities for harm from abuse, exploitation and neglect to occur
- knowing how and when to report safeguarding concerns to HSC Trusts, the PSNI and the Disclosure and Barring Service

1.4 All staff and volunteers will prevent and reduce the risk of harm to adults, while supporting people's right to maintain control over their lives and make informed choices free from coercion.

1.5 Threshold will establish clear guidance for reporting concerns that an adult is, or may be, at risk of being harmed or in need of protection and how these will be responded to.

1.6 All staff and volunteers will undertake appropriate safeguarding training. This training will be updated every two years in accordance with best practice.

1.7 Threshold will promote a range of preventative measures which encourage individuals to keep themselves safe and to prevent harm occurring.

2.0 Scope of Policy

2.1 This policy, along with the Adult Safeguarding procedure, is designed to enable everyone who works for Threshold to understand and carry out their responsibilities for safeguarding adults who need care and support and are at risk of, or experiencing, harm.

3.0 Purpose

3.1 To protect the right of people we support to live in safety, free from harm, abuse and neglect.

3.2 To ensure that all Threshold staff are aware of and adhere to the Adult Safeguarding Policy and Procedure.

3.3 To set out the key arrangements and systems that Threshold has in place for safeguarding and promoting the welfare of adults at risk and to ensure compliance with requirements under legislation and regulation (Appendix 1). Adults are those aged 18 years and over. This policy should be read and followed in conjunction with the Threshold Adult Safeguarding Procedure.

3.4 To have a clear, well publicised policy of zero-tolerance of abuse within Threshold.

3.5 to ensure that people we support:

- have their human rights respected at all times, including that consent is sought in relation to safeguarding concerns
- are treated with dignity, respecting their right to choice
- are empowered and enabled to manage their own health and wellbeing and to keep themselves safe
- are central to any actions and decisions affecting their lives
- have access to justice when harm has occurred
- are able to tell us anything that is worrying them
- receive help and support to deal with their concern

4.0 Objectives

4.1 To ensure that all staff and volunteers working or volunteering for, or on behalf of, Threshold, understand their responsibilities in relation to safeguarding adults at risk and know who to escalate concerns to within Threshold and externally if needed and appropriate to do so.

4.2 To manage the safety and wellbeing of adults in line with legislation and best practice.

4.3 To identify lessons to be learned from cases where adults have experienced abuse or neglect.

4.4 Threshold aims to support and empower each person we support to make choices, to have control over how they want to live their own lives and to prevent abuse and neglect occurring in the future. Threshold intends to take this approach with all safeguarding concerns.

5.0 What is safeguarding?

5.1 The language of adult safeguarding previously focused on protection and used the term “vulnerable adult”. This term suggested weakness on the part of the adult, which is inappropriate. Regional policy has moved from the concept of “vulnerability” to establishing the concept of “risk of harm” in adulthood. The responsibility for harm caused sits with those who perpetrate 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.

5.2 Safeguarding adults is complex and challenging. The focus of any intervention must be on promoting a proportionate, measured approach to balancing the risk of harm with respecting the adult’s choices and preferred outcome for their own life circumstances. There are also some circumstances when it may be necessary to consider the protection and rights of others and, in these

circumstances, overriding the withholding of consent may be necessary to ensure the protection of others.

6.0 Selected Definitions

6.1 Preventative Safeguarding

This includes actions and measures such as practical help, care, support and interventions designed to promote the safety, wellbeing and rights of adults which reduce the likelihood of, or opportunities for, harm to occur. Prevention will strive towards early intervention to provide additional supports at all levels for adults whose personal characteristics or life circumstances may increase their exposure to harm. Many of our services are provided for people whose personal characteristics may potentially increase their exposure to harm and operate in a way that should contribute to “preventative safeguarding” for the people we support. These services are classed as “preventative services”.

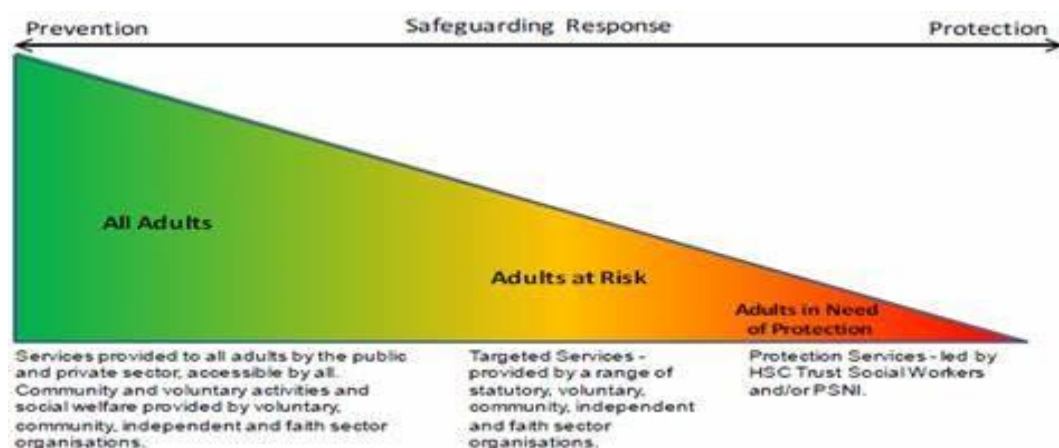
6.2 Protective Safeguarding

This further level of safeguarding activity will be targeted at adults who are in need of protection, that is, when harm from abuse, exploitation or neglect is suspected, has occurred, or is likely to occur. This protection service is led by HSC Trusts and the PSNI. We contribute to “protective safeguarding” by cooperating in the investigation of allegations of harm or by developing and delivering a care and protection plan.

6.3 Targeted Services

These are services delivered specifically to “adults at risk” in order to meet assessed needs and/or address risks. Regionally, these include care in people’s own homes, supported living, residential or nursing home care. Threshold’s regulated services (those inspected by RQIA) are seen as “targeted services” for “adults at risk”.

The distinction between “preventative safeguarding” and “protective safeguarding” services is shown in Figure 1 (below) from the regional policy.



6.4 Abuse

The regional policy defines abuse 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”. This definition is expanded within our Adult Safeguarding Procedure.

6.5 Harm

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

6.6 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:

- a) personal characteristics
AND / OR
- b) 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.

6.7 Adult in need of protection

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

- a) personal characteristics
AND / OR
- b) life circumstances
AND
- c) who is unable to protect their own wellbeing, property, assets, rights or other interests
AND
- d) where the action or inaction of another person or persons is causing, or is likely to cause, him / her to be harmed

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

Further relevant definitions are provided within our Adult Safeguarding Procedure.

7.0 Risk Assessment

7.1 The regional policy states (page 32):

“When any risk of harm is identified, a risk assessment must be undertaken to establish the degree of risk of harm to that individual and to others. It is the responsibility of suitably qualified statutory HSC professionals to undertake such risk assessments once a concern has been raised. In certain circumstances HSC Trusts may ask another organisation to conduct risk assessments on its behalf.”

- If the person we support is identified as being in need of protection, the relevant Service Manager should refer the person to the local HSC Trust for an assessment of risk and need.

- If any member of staff or volunteer has reason to believe that a person we support meets the definition of an “adult in need of protection”, they must immediately discuss their concerns with their line manager or, out of hours, the On Call Manager. Failure to do so may be dealt with under our Disciplinary Policy.

8.0 Adult Protection Gateway Service/Team (APGT)

8.1 As the risk of harm increases, the safeguarding response required to mitigate it also increases. At the higher end of the safeguarding continuum is the Adult Protection Gateway Service. This service is provided for “adults in need of protection”, that is, those adults for whom harm from abuse, exploitation or neglect, is a reality either because it has already occurred or, without intervention, is at serious risk of occurring. Protection interventions are led by Social Workers within the HSC Trusts and/or PSNI officers.

The Belfast Health and Social Care Trust Adult Protection Gateway Team can be reached at 028 9504 1744 during office hours (9am to 5pm, Monday to Friday). For out-of-hours emergencies, contact the Regional Emergency Social Work Service at 028 9504 9999.

For immediate danger, always call 999.

8.2 If any member of staff or volunteer has reason to believe that a person we support is experiencing abuse, exploitation or neglect, or is at serious risk of this occurring, they must immediately discuss their concerns with their line manager or, if out of hours, the On Call Manager. • If the person we support is experiencing, or is at serious risk of experiencing, abuse, exploitation or neglect, the threshold for referral to the Gateway service is generally met.

8.3 If the person we support is experiencing, or is at serious risk of experiencing, abuse, exploitation or neglect, the threshold for referral to the Gateway service is generally met. The Service Manager should seek advice from a Trust Designated Adult Protection Officer (DAPO) without delay.

9.0 Governance

9.1 Robust governance arrangements offer assurance to managers and leaders that the organisation is doing all it can to keep adults who receive support safe from harm. Our governance arrangements ensure that:

- our focus is on the individual, and that
- we base our approach upon respect and treating people with dignity.

Our governance arrangements, consistent with the regional policy, are supported by a range of policies and procedures which are located on our intranet. As a provider of targeted services, Threshold operates services within a framework defined by the sets of regulations associated with the Health and Personal Social Services (Quality, Improvement and Regulation) (Northern Ireland) Order 2003. Threshold is committed to reducing the risk of harm to adults through safe working practices and governance assurance.

Training staff is key to our governance arrangements and all staff are provided with training relevant to their roles.

10.0 Adult Safeguarding Champion (ASC)

10.1 Consistent with the regional policy, Threshold has identified the Head of Quality, Compliance and Learning as our Adult Safeguarding Champion (ASC). The role of the ASC is to:

- provide information and support for staff and volunteers on adult safeguarding within the organisation
- ensure that the organisation's Adult Safeguarding Policy is disseminated and to support its implementation throughout the organisation
- advise the Learning and Development team within the organisation regarding adult safeguarding training needs
- provide advice to staff and volunteers who have concerns about the signs of harm, and ensure appropriate reporting to HSC Trusts where there is a safeguarding concern
- support staff and volunteers 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
- establish contact with the HSC Trust Designated Adult Protection Officer (DAPO), PSNI and other agencies as appropriate
- ensure accurate and up to date records are maintained detailing all decisions made, the reasons for those decisions and any actions taken
- 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
- Work with external agencies to further develop our profile as a safe and empowering provider
- Complete the Annual Safeguarding Position report and share with relevant staff
- Share any lessons learned as a result of safeguarding concerns with the wider organisation as appropriate

10.2 Threshold also has a Deputy Adult Safeguarding Champion (DASC), one of our Locality Managers. The Deputy Adult Safeguarding Champion will be available to staff when the Adult Safeguarding Champion is on leave.

10.3 At Threshold the ASC delegates some of the operational activities of the ASC role to Locality and Service Managers. This includes the day-to-day management of safeguarding concerns and the reporting of these, as appropriate to external agencies, such as RQIA and HSCTs. However screening of all safeguarding concerns takes place between these managers and either the ASC or DASC, prior to reporting. There are mechanisms in place to ensure that all screening decisions are recorded.

10.4 All managers to whom ASC activities are delegated have the appropriate training to undertake these tasks.

11.0 Capacity and Consent

11.1 We hold the presumption that an adult is able to give or withhold consent, unless it is established otherwise.

11.2 We believe every adult has the right to make what others might regard as an unwise decision and, where this creates a risk of harm, a balance will need to be struck between the individual's human rights and the need to intervene.

11.3 In circumstances where there may be reason to think that the adult lacks capacity to consent to safeguarding actions, or withholds their consent, the advice of Threshold's ASC must always be

sought. We will work in partnership with the adult to strive to involve them in decision-making as far as possible and give them appropriate support.

12.0 Duty of Candour

12.1 A duty of candour is an onus on staff to be open and transparent with people we support and other stakeholders when serious mistakes are made.

12.2 Whilst there is currently no legislative requirement for duty of candour in Northern Ireland, Threshold upholds the overarching principles of duty of candour and will act openly and transparently regarding the care and support of people we support when things go wrong. A Duty of Candour Framework has recently been the subject of consultation by the Department of Health in Northern Ireland for proposed legislative purposes.

12.3 People we support at Threshold are provided with support that is safe, effective, and based on best practice, however we recognise that when incidents do occur, they may have the potential to cause harm. Threshold will act in a timely manner, investigating, reflecting, learning and, where appropriate to do so, sharing information to reduce the risk of reoccurrence.

12.4 To meet the requirements of the duty of candour, Threshold must make commitments to relevant persons of transparency, openness, and fairness in relation to the care, support, and treatment of people we support.

12.5 The relevant person must be notified in person as soon as possible, and this will be followed up with a written notification that includes:

- A factual account of the incident
- An apology
- What further enquiries will be taking place.
- Confirmation of when an update will be provided.
- A further notification, including an apology and details of the outcome of any further investigations

12.6 Threshold will encourage a culture of openness and transparency by leading by example through its day-to-day actions and communications.

12.7 Threshold will support employees at all levels to follow this commitment, ensuring that they are not obstructed to do so.

12.8 Any incident where an individual has been obstructed in carrying out their duty of candour will be investigated by a Manager at Threshold.

12.9 Duty of candour will be discussed at one-to-one discussions, supervisions, appraisals, and staff meetings to ensure it is embedded in staff practice across the organisation.

12.10 All staff are required to report immediately to their line manager any incidents or concerns where duty of candour applies and should follow normal incident reporting procedures.

12.11 Line Managers are required to report to the relevant Senior Manager who in turn will advise the CEO where necessary. Relevant Senior Managers will also report as appropriate to relevant external stakeholders, or delegate to Service/Locality Managers in this regard, providing advice and support.

12.12 Three questions should be asked to decide if an incident meets the requirement for duty of candour:

- Did something unintended or unexpected happen during the care or support of an individual?
- Did it occur during the provision of a regulated activity?
- Has it resulted in death or severe or moderate harm?

The answer to all three questions must be 'yes' in order to meet the reporting threshold for duty of candour to be applied.

13.0 Support

13.1 Threshold takes seriously the need to provide support to individuals (people we support or staff) who are either alleged, or confirmed, to have experienced abuse or who have witnessed abuse whilst being supported/employed by the organisation.

13.2 Examples of support provided include

- emotional support from staff and managers
- signposting and assistance to source professional support from other organisations eg Nexus, Victim Support NI
- liaise with multi-disciplinary teams, implement Risk Management Plans, Protection Plans, Safety Plans and amend Support Plans and Risk Assessments accordingly.
- People will always be treated with dignity, respect and compassion in these circumstances.

14.0 Responsibilities to those alleged to have caused harm

14.1 People and organisations who are alleged to have caused harm to an adult at risk have the right to be treated fairly and their confidentiality respected throughout the Adult Safeguarding Procedure regardless of whether they are a member of staff or a service user. This includes the responsibility to ensure that a person or organisation alleged to have caused harm:

- knows that they are the subject of a safeguarding allegation (irrespective of any other investigation, such as disciplinary investigation or criminal proceedings) and that an investigation is being undertaken under this safeguarding procedure into an alleged concern involving their practice or behaviour
- is informed of the nature and content of the allegation in a timely manner and has an opportunity to respond to allegations concerning their practice or behaviour (for example through an interview) prior to the outcome of the safeguarding investigation.

- where appropriate, is given two working days' notice of any meeting due to be held to establish the outcomes of the investigation.
- has an opportunity to read the investigation report and respond to the findings of the investigation.
- knows the conclusion reached within an investigation, in exceptional circumstances may not be shared with them, for example where it is advised by police or is not in the best interests of the adult at risk.

14.2 Further detail on the procedures for dealing with staff who have been alleged to have perpetrated harm can be found in both the Threshold Adult Safeguarding Procedure and the Threshold Disciplinary Policy.

15.0 Contracting External Services

Any services requisitioned by Threshold must have their own safeguarding policy and procedures before gaining direct access to people supported by Threshold. At a minimum this must indicate recognition that adults may need safeguarding, that staff can recognise the signs of abuse, exploitation and neglect, and that the organisation has a zero tolerance approach. A reporting procedure to Threshold, HSC Trusts and PSNI must be in place for any safeguarding or protection issues.

16.0 Other Relevant Threshold Policies and Guidance

- Adult Safeguarding Procedure
- Whistleblowing Policy
- Disciplinary Policy

This document should not be read in isolation. It should be seen as one element in our adult safeguarding approach, alongside:

- Threshold's Adult Safeguarding Procedure
- Adult Safeguarding: Prevention and Protection in Partnership (DHSSPS/ DoJ, 2015). It is expected that all Threshold managers who are involved in safeguarding decisions will be familiar with the regional policy document referred to above. Further reference documents are set out in Appendix 1.

17.0 Named Adult Safeguarding Champions

ASC: Joanna Clarke, Head of Quality, Compliance and Learning

DASC: Lynne Willis, Locality Manager

Appendix 1

Relevant Legislation, Policies and Standards Frameworks

These include:

- Safeguarding Vulnerable Groups (Northern Ireland) Order 2007 (amended by the Protection of Freedoms Act 2012)
- Adult Safeguarding Operational Procedures – Adults at Risk of Harm and Adults in Need of Protection (September 2016)
- Safeguarding Vulnerable Adults a Shared Responsibility, Standards & Guidance for Good Practice in Safeguarding Vulnerable Adults (2010)
- Protocol for the joint investigation of alleged and suspected cases of abuse of vulnerable adults (2009)
- European Convention on Human Rights, as amended 2010
- Human Rights Act 1998
- The Health and Social Care Trusts' Policies and Procedures
- Northern Ireland Social Care Council Codes of Conduct for Employers and Employees
- Health and Personal Social Services (Quality, Improvement and Regulation) (Northern Ireland) Order 2003
- The Adult Placement Agencies Regulations (NI) 2007
- The Domiciliary Care Agencies Regulations (NI) 2007
- The Residential Care Homes Regulations (NI) 2005
- Housing Executive Safeguarding Policy & Procedure (July 2018)
- The Criminal Law Act (Northern Ireland) 1967
- The Sexual Offences (Northern Ireland) Order 2008
- The Family Homes and Domestic Violence (Northern Ireland) Order 1998
- The Mental Health (Northern Ireland) Order 1986
- The Public Interest Disclosure (Northern Ireland) Order 1998
- The Human Trafficking & Exploitation (Criminal Justice & Support for Victims) Act (NI) 2015
- 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

[Adult Safeguarding: Prevention and Protection in Partnership](#)

