



Federation Northern Ireland

**A response to**

**Consultation on a draft Adult  
Safeguarding Policy**

**Department of Health, Social Services & Public  
Safety / Department of Justice**

**9 February 2015**

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**24 Hour Domestic & Sexual Violence Helpline**

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Email Support: [24hrsupport@dvhelpline.org](mailto:24hrsupport@dvhelpline.org)

Text **support** to 07797 805 839

Freephone from all landlines and mobiles. Translation service available.  
Open to *all women and men* affected by domestic & sexual violence

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## 1. Women's Aid Information & Statistics

### 1.0 Introduction

Women's Aid is the lead voluntary organisation in Northern Ireland addressing domestic and sexual violence and providing services for women and children. We recognise domestic and sexual violence as forms of violence against women. Women's Aid seeks to challenge attitudes and beliefs that perpetuate domestic and sexual violence and, through our work, promote healthy and non-abusive relationships.

### 2.0 Core work of Women's Aid

The core work of Women's Aid in Northern Ireland, including Women's Aid Federation Northern Ireland and local Women's Aid groups is:

- ) To provide refuge accommodation to women and their children suffering mental, physical or sexual abuse within the home.
- ) To run the 24 Hour Domestic & Sexual Violence Helpline.
- ) To provide a range of support services to enable women who are affected by domestic and/or sexual violence to rebuild their lives and the lives of their children.
- ) To provide a range of support services to children and young people who have experienced domestic or sexual violence.
- ) To run preventative education programmes in schools and other settings.
- ) To educate and inform the public, media, police, courts, social services and other agencies of the impact and effects of domestic and sexual violence.

- ) To advise and support all relevant agencies in the development of domestic violence policies, protocols and service delivery.
- ) To work in partnership with all relevant agencies to ensure a joined up response to domestic and sexual violence.

Throughout this consultation response, the term “Women’s Aid” is used to reflect the overall Women’s Aid movement in Northern Ireland, which is made up of our local Women’s Aid groups and Women’s Aid Federation. All local Women’s Aid groups are members of Women’s Aid Federation Northern Ireland. Each Women’s Aid group offers a range of specialist services to women, children and young people who have experienced domestic violence.

### **3.0 Women’s Aid statistics (2013-14)**

- ) 999 women and 747 children sought refuge.
- ) 59 women in refuge were supported during their pregnancies and 15 babies were born to women in refuge.
- ) 1,084 one to one support sessions were held with children and young people in refuge.
- ) 3,558 women with 4,869 children accessed the Floating Support service, and a further 1,662 women accessed other Women’s Aid outreach services, enabling women to access support whilst remaining in their own homes and communities.
- ) 1,554 women participated in a range of group work and personal development programme including *Journey to Freedom* and *You and Me, Mum*.
- ) 375 women accessed support from a Women’s Aid Women’s Safety Worker while their partners or ex partners were undertaking the IDAP perpetrators programme provided by Probation Board Northern Ireland. An additional 128 children were referred to the Women’s Safety Worker in 2013-14.
- ) The 24 Hour Domestic & Sexual Violence Helpline, open to all women and men affected by domestic & sexual violence, managed 55,029 calls.
- ) 150 teachers were trained to deliver the Helping Hands programme in primary schools.

### **4.0 Additional Women’s Aid statistical data**

- ) Since 1999, Women’s Aid across Northern Ireland gave refuge to 17,424 women and 16,235 children and young people.
- ) Between 1995 – 2014, 429,435 calls were managed by the 24 Hour Domestic & Sexual Violence Helpline.

## 5.0 Statistics: Domestic violence & violence against women

- J Domestic violence is a violation of Article 5 of the UN Universal Declaration of Human Rights – that “no one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment”.
- J The joint DOJ, DHSSPS Strategy “Tackling Violence at Home” estimates that the cost of domestic violence in Northern Ireland, including the potential loss of economic output, could amount to £180 million each year.
- J UNICEF research released in 2006, showing per capita incidence, indicates that there are up to 32,000 children and young people living with domestic violence in Northern Ireland.
- J Where the gender of the victim was known, 72% of adult victims of domestic crimes recorded by the PSNI in 2012/13 were female.<sup>1</sup>
- J Over 30% of all domestic violence starts during pregnancy.<sup>2</sup>

## 6.0 Domestic & Sexual Violence: Crime statistics (Source: PSNI Statistics 2013/14)

- J Domestic Violence is a crime. PSNI statistics for 2013/14 indicate that there were more recorded crimes with a domestic motivation (12,720) than the combined total of all the following crimes (12,079) – possession of drugs (3764), shoplifting (6,372) and theft of a motor vehicle (1,943).
- J PSNI Statistics for 13/14 indicate that they responded to a domestic incident every 19 minutes of every day of the year.
- J The total of 12,720 crimes with a domestic motivation in 13/14 represents an average of approximately 1 domestic crime every 41 minutes in Northern Ireland.
- J The number of all recorded offences of murder in Northern Ireland in 13/14 total 17. Those classed as having a domestic motivation total 7. Therefore, 41% of all murders in Northern Ireland in 13/14 had a domestic motivation.
- J There were 550 rapes (including attempted Rapes) in Northern Ireland in the period 2013/14.  
(Source: PSNI Statistics 2013/14)  
Official sources (NISOSMC) estimate that up to 80% of sex crimes are not reported.

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<sup>1</sup>Findings from the PSNI Trends in Domestic Abuse Incidents and Crimes Recorded by the Police in Northern Ireland 2004/05 to 2012/13 N.B. “Adult” defined as aged 18 and over

<sup>2</sup>Women’s Aid Federation Northern Ireland

Women’s Aid Federation Northern Ireland – Response to *Consultation on a draft Adult Safeguarding Policy* – FINAL – 10 February 2015

## 2. Consultation Response

- ) Women's Aid Federation Northern Ireland welcomes the publication of the *Consultation on a draft Adult Safeguarding Policy*, and the opportunity to comment on it on behalf of our local Women's Aid groups.
- ) We are largely supportive of the ethos underpinning the document, that everyone has a fundamental right to be safe and that safeguarding is everyone's business (at 1.1.1). However although everyone has a role to play in safeguarding, it does not follow that everyone has the expertise or skills to intervene directly to protect and safeguard vulnerable adults. The policy should clarify from the outset the extent and nature of everyone's duty in respect of safeguarding.
- ) We warmly welcome the new language of safeguarding included in the document. The concept of adult safeguarding as a continuum of activity for prevention, early intervention and protection (at section 7) is grounded in reality and reflects best practice for tackling abuse.
- ) Women's Aid agrees that the term "risk of harm" is helpful (at 2.1.2), and better encapsulates the wide range of situations that may result in an adult requiring safeguarding. We also agree that the term "vulnerable adult" is open to misinterpretation and can exclude some of those in need of safeguarding due to a narrow construction of what "vulnerable" means. For example, in domestic violence situations a victim may fall under the category of adult in need of safeguarding. However this does not mean that they should be permanently defined as a vulnerable adult; rather the abusive relationship creates a vulnerability that is transitory for the duration of that abuse. The "risk of harm" definition more easily includes situations like this, and is therefore a more natural fit when discussing whether safeguarding arrangements are required to be put in place for a particular adult. The division of 'risk of harm' into 'personal characteristics' and 'life circumstances' is also helpful.
- ) While it is true that harm can have a lasting impact on not only victims but also their families and carers (at 2.1.2), it is also important to acknowledge that both families and carers can be perpetrators of that harm and abuse.
- ) We support the aim at 2.1.4 to promote "a proportionate, measured approach to balancing the risk of harm with respecting the adult's choices and preferred outcome or their own life circumstances". We also agree with the concept of a presumption of capacity unless there is evidence to suggest otherwise, and we support the aims to that

effect outlined at 3.1.1. Victims of domestic violence and abuse have by definition been denied autonomy and control of their own lives by their abuser, and it is essential as part of their recovery process that they are able to regain control of their lives and decision-making power. This must be balanced with the need to protect high risk victims from serious harm. The work of Women's Aid is rooted in the ethos of self-help, and the belief that women are not passive victims of domestic violence. We believe that, with the right support, women have the capacity to overcome the debilitating impact of the violence and abuse they experience. This must include the empowerment of women to make their own decisions wherever possible. This is not withstanding the need to act in contravention of the wishes of an adult at risk of harm if the safety of others, particularly children, is also at risk.

- ) In the diagram on page 5, it would be useful if voluntary organisations were included in the "adults in need of protection" section, as this reflects the reality of adult protection in Northern Ireland. For example, Women's Aid provides a public service on behalf of government through our refuges, outreach services and the running of the 24 Hour Domestic & Sexual Violence Helpline, which is open to all women and men affected by domestic or sexual violence. We provide crisis support for women and their children who are at imminent risk of harm.
- ) Regarding the list of aims at 3.1.1, there appears to be some confusion over what type of document this draft is intended to be. The aim to "establish clear procedures for reporting and responding to concerns that an adult is, or may be, at risk" is admirable and to be welcomed, but as a policy document it is perhaps not the appropriate place to go into procedural or operational detail. At times the document reads like a policy, at others it reads like a strategy, and at later stages of the draft it goes into operational and procedural detail. This results in a document that may not be adaptable to the everyday reality of all relevant organisations adhering to the policy. The inclusion of operational minutiae may limit the utility of the document for organisations that have existing structures and procedures. For instance, Women's Aid already has well-established adult safeguarding procedures which would be different from those procedures advocated in this draft. We have commented on this in more detail in relation to the role of the Champion below.
- ) We welcome the inclusion of domestic violence and abuse as one mechanism that interfaces with adult protection arrangements. We are encouraged that it is correctly defined as a pattern of behaviour which does not only include physical violence and occurs right across society. We would point out that all the forms of abuse outlined at sections 5.1.13 (physical abuse, sexual violence and abuse, psychological / emotional

abuse, financial abuse, neglect, exploitation) can be components of domestic violence. The distinguishing characteristics of domestic violence are the relationship between perpetrator and victim, and the sustained nature and pattern of control underpinning the abuse. Domestic violence falls under the categories of life circumstances that can expose an adult to risk of harm, and the actions of another person that can result in an adult being in need of protection. It would be useful to expressly state this in the policy at section 5.2.2.

- ) Women's Aid agrees that closer and better partnership working is needed to fully deliver on the aims of this policy (2.1.5), and supports the concept of the continuum of adult safeguarding in section 7. Through our work with victims of domestic violence, we work in partnership work with a wide range of statutory and non-statutory agencies. Although there have been advances in partnership working between statutory agencies like the PSNI and HSC Trusts and non-statutories, improvement is still needed to put the safeguarding continuum into practice. Voluntary organisations with extensive vocational experience and expertise are a crucial resource in safeguarding adults at risk of harm. Their in-depth knowledge of their field can provide guidance to social workers and other public servants, and can help statutory agencies understand the unique safeguarding needs of an adult at risk.
  
- ) We have concerns that the role of local communities and services laid out at 7.1.3 - 7.1.5 and in section 8 may be difficult to implement and may lack the governance and accountability necessary to ensure that adults at risk of harm are kept safe. Generally, while we welcome the concept of a continuum of safeguarding and can easily see where an organisation like Women's Aid fits in terms of our role and responsibility, it may not be feasible or practical to apply a similar responsibility to the community at large. We would also point out that the obligation to recognise and report adults who may be at risk can only be delivered in practice with proper training on all aspects of adult safeguarding, including domestic and sexual violence. Safer communities are educated communities. Any such training must be delivered by experts who can proactively dispel myths and educate communities about the nature of domestic and sexual violence, and how these issues interact with adult safeguarding and the responsibilities of communities and community organisations.
  
- ) It is also crucial that the section on training in this document (section 15) specifies that any training should be delivered by specialists with requisite expertise to deliver training that is effective and in keeping with recognised best practice.

- ) Women’s Aid also urges that training on the intersection between domestic and sexual violence and adult safeguarding is rolled out throughout statutory agencies, in the interest of implementing the continuum of adult safeguarding in practice. This training should not only focus on the physical elements of abuse - all practitioners should be trained to recognise and respond appropriately to evidence of emotional or psychological abuse. The basis of all forms of abuse is control, which enables a perpetrator to inflict other forms of abuse on their victim. If practitioners are properly trained to recognise and respond to psychological abuse they are more likely to be able to intervene earlier and perhaps prevent physical harm from taking place. It also ensures that cases where psychological harm but not physical harm is occurring can be identified and steps taken to safeguard that individual.
- ) As the draft policy acknowledges, domestic violence is a significant safeguarding issue in Northern Ireland. In 2013/14 alone, the PSNI responded to 27,628 incidents with a domestic motivation. Notwithstanding this, it has been our professional experience that domestic violence is still not widely understood as an adult safeguarding issue. This makes it all the more vital that all frontline staff with adult safeguarding responsibility are trained to understand domestic violence and its relevance to adult safeguarding work. Even if domestic violence is only one aspect of a larger safeguarding case, a practitioner’s understanding of the effect of domestic violence will inevitably improve the overall response to that at risk adult.
- ) It may be instructive to look to the development of adult safeguarding policy elsewhere in the UK, particularly regarding the intersection between adult safeguarding and domestic violence. In England & Wales, the expanded definition of domestic violence to include coercive control and the announcement of the new coercive control law are shaping how domestic violence work and interagency adult safeguarding work are increasingly interlinking. The need to continue to amalgamate this work is highlighted in the local government guidance to support practitioners on domestic violence and adult safeguarding.<sup>3</sup> Further learning has been made possible by domestic homicide reviews, which provide useful learning on victims’ experiences of harm and opportunities for improvement in the safeguarding response. Such tools would be of great use in the Northern Irish context.
- ) We welcome the guidance for safer organisations at section 8.3, including minimum safeguarding expectations and standards for internal governance. It would be useful at 8.4.1 if the point on “knowing how and when to report” was expanded to include

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<sup>3</sup> [http://www.local.gov.uk/c/document\\_library/get\\_file?uuid=5928377b-8eb3-4518-84ac-61ea6e19a026&groupId=10180](http://www.local.gov.uk/c/document_library/get_file?uuid=5928377b-8eb3-4518-84ac-61ea6e19a026&groupId=10180)

reporting to relevant crisis support organisations where appropriate. This would be a particularly useful addition to the policy given that many communities in Northern Ireland remain hostile to the police service as a legacy of the Conflict, and that some members of society are suspicious of social workers and may be unlikely to report concerns to those agencies.

- ) Whistle-blowing (at 8.5) is a crucial aspect of adult safeguarding. It may be useful if the document advocated for an external, independent body to report adult safeguarding concerns within institutions in addition to an internal point of contact within organisations. It would also be helpful if the document stated that whistle-blowing policies should not only deal with the disciplining of a perpetrator, but also consider how organisations should mitigate the impact of abuse and harm on the victim.
- ) We have concerns that the role of the Adult Safeguarding Champion (at 8.5.7 - 8) is too broad to be useful or practical. While we support the idea of the safeguarding Champion, we have a number of reservations about the extensive responsibilities that the draft policy places on each Champion. For example, the role of ensuring “reporting to HSC Trusts where there is a safeguarding concern” should not be left up to one person who has also been assigned a wide range of other duties. We are not convinced that a champion is the appropriate person to take on this responsibility, especially given that this is likely already the role of a line manager of frontline workers in direct contact with an adult at risk of harm. For example, within our local Women’s Aid groups a number of people already fulfil this role. These would be the line managers of outreach workers, refuge support workers or Helpline workers, who are specifically trained to manage such situations and interface with their staff and statutory organisations. If such a responsibility fell to one Champion in an organisation, it would not only create an excessive workload for that Champion, but would also add an extra unnecessary layer of reporting and complicate the line management system that is in place in many voluntary sector support organisations. We appreciate that assigning this role to a Champion may be useful for organisations that do not tend to deal with adult safeguarding issues regularly, and perhaps do not have expertise in the field or operational procedures in place, although there remain issues with placing such a wide range of responsibilities on one person.
- ) At 8.5.8, we note that the draft document refers to outdated language in some places, such as the Adult Protection Social Workers, which as far as we are aware no longer exist. The document should be updated to reflect current structures and titles within the HSC Trusts.

) In relation to protection of adults at risk of harm and referral pathways in sections 10 and 11, we are not convinced that the draft policy in its current state successfully espouses Underpinning Principles outlined at section 4. For example, the document only mentions statutory bodies such as the HSC Trusts and PSNI as bodies engaged in protection and risk assessment work. This does not reflect the current reality of adult safeguarding, and it is not in keeping with the ethos and underlying principles of the draft document. Women's Aid acts in both a preventative and protective capacity to safeguard victims of domestic violence. We provide a wrap-around service for women who have suffered domestic violence and their families. Our direct work with victims of domestic violence includes crisis support, risk assessment and safety planning at the point of leaving a relationship, outreach support allowing women to remain in their homes (with or without a perpetrator), and emotional support and personal development programmes to help women rebuild their lives after abuse. We also manage the 24 Hour Domestic & Sexual Violence Helpline, which provides emotional support, advice, referrals and signposting to all women and men affected by domestic or sexual violence.

- 999 women stayed in our refuges in 2013/14
- 5,220 women accessed community based outreach, including Floating Support which is funded through Supporting People.
- The 24 Hour Domestic & Sexual Violence answered 50,335 calls in 2013/14

) Domestic violence is frequently one component of the complex circumstances which put an adult at risk of harm and in need of protection. Even if domestic violence is not the primary reason for an adult being in need of protection, the existence of that abusive relationship impacts on how agencies should respond to protect them. When a specific issue like domestic violence is identified, it is in the interests of that adult for public agencies to liaise with the relevant voluntary organisations to share information and expertise. At present, the protection section of the policy is only a one-way pathway, with obligations on voluntary and community organisations to refer to statutory agencies. For the policy to truly put its own aims and principles into action, there must be a reciprocal arrangement whereby statutory agencies recognise and utilise the knowledge and expertise of relevant voluntary organisations.

) In cases where domestic violence is present, such an arrangement would not only safeguard an adult in need of protection more effectively, but would also help to empower that adult. It is not always immediately evident to a victim of domestic violence that they are being abused – in such cases it is vital that they are given the right support to help them come to terms with what is happening to them and empower

them to protect themselves. In cases where domestic violence is suspected, it is our view that statutory agencies should contact Women's Aid as a matter of protocol.

) Regarding access to justice and support for victims at section 13, it is important that this policy acknowledges the need for referral to relevant specialist support services at the earliest possible opportunity. Extensive research and evidence has proven that the earlier a victim of domestic violence is signposted to organisations like Women's Aid, the better their outcomes and experience of the justice system. Victims are more likely to engage with justice agencies, give best evidence, and feel less traumatised. They are also more likely to be informed of and access the special measures and additional support available to them.

### 3. Contact Details

For further information about this response please contact:

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