

MEALS ON WHEELS

VULNERABLE PERSONS PROTECTION POLICY

approved, endorsed and adopted
by the Board of Directors of Meals on Wheels
on July 19, 2018

This policy applies to all Charity Trustees (as that term is defined in the Charities Act 2014), all employees of Meals on Wheels, all volunteers, all staff, all temporary staff, and certain contractors (collectively “Meals on Wheels Representatives” or “Representatives” and each a “Representative”).

1. Introduction

Meals on Wheels is a Bermuda registered charity formed to supply meals and other support to people who are incapacitated, unable to prepare and cook a nourishing meal on their own, or who have no one else they can depend on to do this for them.

2. Policy Statement

Meals on Wheels is a community-focused charity and seeks, wherever possible, to uphold every persons’ right to be safe from abuse regardless of age, gender, ethnicity, disability, sexuality or beliefs. The objective of this policy is to document and codify the way in which Meals on Wheels will safeguard and protect seniors and vulnerable adults (collectively “Vulnerable Persons”), and provide protocol for reporting and handling of incidents relating to Vulnerable Persons.

Meals on Wheels considers all expressions of concern and allegations of abuse very seriously and will make every effort to respond and refer appropriately in each instance.

3. Policy Scope

This policy applies to all:

- Directors;
- Employees;
- Service providers;
- Volunteers;
- Partners; and
- Contractors.

4. Types of Abuse

A person may abuse or neglect a vulnerable adult by inflicting harm or by failing to act to prevent harm. Seniors and vulnerable adults may be abused in a family or in an institutional or community setting; by those known to them or by a stranger.

The main areas of abuse are set out below (this is not exhaustive):

a) Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm.

b) Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a vulnerable person such as to cause negative effects on emotional development. It can take the form of name calling, threatening, ridiculing, intimidating or isolating.

c) Sexual Abuse

Sexual abuse is forcing or enticing a vulnerable person to take part in sexual activities, whether or not the vulnerable person is aware of, or consents to, what is happening. The activities may involve rape, sexual assault, or sexual acts. Sexual abuse can also include acts where touching is not involved such as being made to look at, or aid in the production of, pornographic material or watching sexual activities.

d) Neglect

Neglect is the failure to provide or ignoring the need for basic necessities of life, such as food, clothing, shelter, medication and supervision.

Ignoring medical or physical care needs, failure to provide appropriate health, social care or educational services, the withholding of necessities of life, such as medication or adequate nutrition.

e) Financial or Material Abuse

Theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

f) Discriminatory Abuse

Racism, sexism or bigotry based on a person's disability, together with other forms of harassment, belittlement, slurs or similar actions.

5. Prevention - Training, Vetting and Supervision

Meals on Wheels takes the view that a robust on-boarding framework for those volunteers and employees interacting with vulnerable persons is the key. A multi-faceted approach to safeguarding vulnerable persons has been adopted involving thorough background checks, mandated training, the appointment of a Vulnerable Persons Officer (and deputy Vulnerable Persons Officer) (together the “VPO”) and related interview questioning as more fully set out below.

a) Background Checks

Those individuals who will come into contact with vulnerable persons as part of their involvement with Meals on Wheels shall be subject to a prior criminal record check by the Bermuda Police Service. Every employee shall consent to a criminal records check as a condition of their employment and, to the extent possible, such check shall be completed prior to the commencement of their employment.

b) Training

The VPO, under the direction of the Board of Directors, shall be responsible for ensuring that every volunteer and employee of Meals on Wheels (each a “Representative”) receives training in the matters covered by this Policy appropriate to their role within Meals on Wheels. The selected training will be in accordance with policy and regulation and updated from time to time.

c) VPO

As stated above, Meals on Wheels has appointed a vulnerable persons officer and deputy vulnerable persons officer both of whom will have a clean criminal record check and have received training in the matters addressed by this Policy. The VPO is the designated person for reporting of incidents involving Vulnerable Persons as more fully set out below.

Barbara Faeilla, VPO – Email bfaiella49@gmail.com, Phone: 599 0498
Tannika Rodrigues, Deputy VPO – Email mowadmin@logic.bm, Phone : 236 1815

d) Interview Process

Meals on Wheels will conduct in-person interviews with prospective employees and relevant volunteers who will be interacting with vulnerable persons. Hypothetical scenarios, wherein the interests of vulnerable persons are threatened, will be posed and the interviewee will be questioned as to their proposed response.

e) Supervision

The VPO will work with the staff to ensure that the vulnerable persons are protected as far as possible and report to the Meals on Wheels Board of Directors with any protocol changes.

6. Abuse – Duties and Protocol

a) Duty to inform

All Meals on Wheels employees and volunteers have a statutory duty of care to report any suspicions they may have in relation to the abuse of vulnerable persons (this includes past or present abuse). As such, the below protocol for reporting incidents should be followed as a matter of utmost importance.

b) Responding to a report or incident

If someone, including a vulnerable person, reports an incident, they must be taken seriously and listened to carefully. Once an allegation is made, there should be immediate action to prevent further harm and victimisation. The VPO should be made aware of the incident or report as soon as reasonably possible. The VPO should determine whether contact should be made with the Bermuda Police Service or appropriate authority, and act accordingly.

When a complaint or allegation has been made against someone connected to Meals on Wheels, be it an employee or volunteer, he/she must be made aware of their rights under relevant legislation and the terms of their employment contract.

It is the responsibility of VPO, working with the reporting individual to document the report or incident including all relevant details and to liaise with the Board of Directors to conduct a thorough investigation. The report shall be in the format of the Protection Incident Reporting Form attached hereto, Appendix B.

Confidentiality is crucial to a fair and effective reporting and investigation procedure. All details of an incident or report must be kept confidential but for reporting to the VPO and relevant authorities (for the avoidance of doubt, this should not supersede taking action to ensure the victim is safe and free from further abuse).

c) VPO

The VPO and deputy VPO are responsible for dealing with reports or concerns about the protection of children and vulnerable adults appropriately. The relevant contact numbers for the Bermuda Police Service and other useful contacts are set out below.

7. Code of Conduct For Representatives

Meals on Wheels will not tolerate a breach of the below code of behaviour and conduct (the "Code"). A violation of the Code may result immediate termination of any relationship with Meals on Wheels and if an employee, in disciplinary procedures up to and including dismissal.

Guidelines

Those interacting with Vulnerable Persons should work to adhere to the following best practice:

- Treat the wellbeing and safety of the Vulnerable Persons as paramount.
- Endeavour to avoid situations where you are alone with a Vulnerable Person whenever practical, especially where you are unobserved.
- If any form of physical contact is required it should be provided openly and be appropriate to the abilities of the Vulnerable Person.
- Representative must feel confident to report concerns or worries about other staff members or volunteers to the VPO.
- The VPO must be informed of all incidents and accidents involving Vulnerable Persons at the earliest opportunity. This can be done in person, by telephone or writing depending on the situation.
- If a vulnerable adult shows any signs or symptoms of abuse that give you cause for concern you must act appropriately and follow the procedures detailed above.

Representatives should never:

- Let any allegation made by a vulnerable adult be ignored or go unrecorded.
- Allow or engage in inappropriate touching of any form.
- Allow vulnerable adults to use inappropriate language unchallenged, or use it themselves.
- Make sexually suggestive comments about, or to, a vulnerable adult, even in fun.
- Do things of a personal nature for vulnerable adults that they are able do themselves. In an emergency situation that requires this type of help, you should endeavour to have someone else present. In such situations it is important that you ensure that you are sensitive to the vulnerable adult and undertake any actions with the utmost sensitivity and discretion.

8. Distribution

Meals on Wheels Representatives shall make a copy of this Policy available to vulnerable persons, their family, guardians and/or carers.

Appendix A

Useful contacts

Meals on Wheels Vulnerable Persons Officer	599 0498
Meals on Wheels Deputy Vulnerable Persons Officer	236 1815
Police/Ambulance/Fire Emergency	911
Hamilton Police Station	295-0011
Hospital	236-2345
Aging and Disability Services	292-7802
The National Office for Seniors and the Physically Challenged (NOSPC)	292-7802
Centre Against Abuse Women's Hotline	297-8278
Centre Against Abuse Men's Hotline	332 1293
Child and Family Services (Administration)	296-7575
The Family Centre	232-1116
Mid Atlantic Wellness Institute	236-3770
Emergency Counselling Lifelines (9:00 am – 5:00 pm)	239-2261
(5:00 pm – 8:00 pm)	236-3770
Medical Social Workers	236-2345
Women's Resource Centre Hotline	295-7273
Family Services	294-5870
Physical Abuse Centre – Hotline	297-8278
or	292-4366

Appendix B

PROTECTION INCIDENT REPORTING FORM

All information will be treated in strict confidence

Date: ___/___/20___ Time: _____ Venue: _____

Name of Person: _____

Address (if known): _____

_____ Postcode: _____

Telephone Number (if known): _____

Address (if different from above): _____

_____ Postcode: _____

Telephone Number (if different from above): _____

Are you reporting you concerns or passing on those of someone else? Please give details:

Please give a brief description of what has prompted the concerns including any specific incidents, places, dates, times etc:

Any physical signs? Behavioural signs? Indirect signs?

Have you spoken to the person? If so what was said?

Has anybody been alleged to be the abuser? If so, give details:

Have you consulted anybody? If so give details:

Your name: _____

Position: _____

To whom reported: _____

Date of reporting: ___/___/20

Signature: _____ Date: ___/___/20__

This form should now be given to the Vulnerable Persons Officer by hand in a sealed envelope marked Private and Confidential.