

March 2017

Affinia Healthcare Safeguarding Vulnerable Adults Policy



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Author(s)	Chinonso Kalu
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Affinia Healthcare and Housing
Suite 3, Imperial Offices
2-4 Eastern Road
Romford, RM1 3PJ
01708752879
01708753012
07960202639

Review Data

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Name	Role/Department	RACI	Date
Chinonso Kalu	Registered Proprietor	RA	29/03/17

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Emergency Contact Details

Name	Email	Mobile
Chinonso Kalu	chinny_affiniahealthcare@gmx.co.uk	07960202639

Policy Statement

Policy Aims

This policy will explain what Safeguarding is and how it operates at *Affinia Healthcare* with respect to caring for Vulnerable Adults.

It will help you to understand how we go about safeguarding through monitoring our performance and the quality of the services we deliver and it will describe your role in keeping Vulnerable Adults safe and free from harm.

Reading this policy should enable you to:

- Understand what Safeguarding is;
- Understand how Safeguarding works at *Affinia Healthcare*;
- Understand your role in our Safeguarding processes;
- Understand how we can all work together to safeguard vulnerable people and realise our duty of care.

Affinia Healthcare aims to be the **provider of choice** within our catchment area and believes we will accomplish this aim by meeting the expectations of our clients, the families of clients, staff, and all other associated stakeholders. When service users choose us, they trust and expect us to treat them fairly and keep them safe. We will monitor our performance and customer satisfaction levels in all key areas of our operations and will review, evaluate and implement improvements, where necessary, on a continuous basis.

Scope of the Policy

- All staff and volunteers who work with Affinia Healthcare are required to be familiar with and comply with this policy and procedure.
- Where the Local Authority area publishes a local set of guidelines on **safeguarding** arrangements, those local guidelines take precedence over this policy.
- **All safeguarding Adults interventions under this policy must follow the London Multi-agency Safeguarding Adults Policy and Procedure.**

Introduction & Key Legislation

This policy identifies the roles and responsibilities of Affinia Healthcare in relation to Safeguarding Vulnerable Adults. It complies with ;

- Safeguarding Vulnerable Groups Act 2006
- The Care Act 2014 (which repealed No Secrets 2000)
- Working Together 2013
- Government Statement of Policy on Adult Safeguarding (HM Government 2013)
- Safeguarding – roles and responsibilities in health and care services 2013

Lead Responsibility

As the Registered Proprietor of Affinia Healthcare, Chinonso Kalu, has **Lead Responsibility** and **Accountability** for ensuring that all operations are carried out in compliance with this Policy and that any concerns that arise are dealt with in accordance with the reporting procedures outlined in this Policy.

Aim of this Policy

The aim of this policy is to **protect vulnerable adults and their workers**, recognising the risks involved in lone working, and includes:

- Clarifying the roles and responsibilities for staff and all healthcare professionals working with Affinia Healthcare and together contribute to the prevention of abuse of vulnerable adults through raising awareness.
- Outlined practice and procedures for all parties within the scope of the policy.
- A clear framework for action when abuse is suspected.

Definition of the Vulnerable

In order to practice safeguarding effectively, it is important that staff at *Affinia Healthcare* understand and can recognise what a vulnerable adult is.

At Affinia Healthcare we **define a vulnerable adult** as:

“...a person over the age of 18 who is in, or may be in need of, care services by reason of mental or other disability, age, or illness; and who is unable to take care of himself/herself, or unable to protect himself or herself against significant harm or exploitation.”

Vulnerable People

What makes an individual vulnerable?

Affinia Healthcare recognises that some individuals we work with may have additional vulnerabilities because they may:

- Lack a wide network of friends who support and protect them
- Have significant communication differences, which may include very limited verbal communication or they may use sign language or other forms of non-verbal communication
- Be subject to the prejudices and/or misconceptions of others
- Require personal intimate care
- Have reduced capacity to resist either verbally or physically
- Not be believed
- Be dependent on their abuser for their care and support
- Lack access to peers to discover what is acceptable behaviour
- Have medical needs that are used to explain abuse

It is important for us to be extra vigilant in creating a safe culture, including:

- Finding appropriate ways of communicating with people we work with
- Working to promote the 'wellbeing' of every individual
- Involving adults in the development of services they receive to the limit of their ability and choice
- Ensuring best practice at all times in personal care
- Building relationships with families and carers where appropriate
- Actively embedding the national principles of safeguarding in our approach. (Care and Support Statutory Guidance 2014)

A **vulnerable person** may include someone who:

- Is elderly and frail;
- Has a mental illness, including Dementia;
- Has a physical or sensory disability;
- Has a learning disability;
- Has a severe physical illness;
- Is a substance misuser;
- Is homeless.

Prevention of abuse:

Living free from harm and abuse is a fundamental human right of every individual and an essential requirement for health and wellbeing.

Often abuse and neglect can be prevented from occurring in the first place if issues are identified and raised as soon as they arise so that they can be addressed at the earliest point.

It is important that adults and those involved with them have access to clear information about the advice and support available to them, how to be aware of possible signs of abuse or neglect and how they can avoid and protect themselves from abuse or neglect as far as possible.

Even, and often especially, where an issue may not appear to be or has not reached a point that it would be described, or thought of, as 'abuse' or 'neglect', it is important that the adult or anyone concerned about this can seek advice and support.

Affinia Healthcare staff have a responsibility to ensure they are aware of concerns, and know how and when to share these with the relevant agencies that could prevent or reduce the risk of abuse or neglect from occurring, for example, in relation to issues about the quality of care and support services.

As an organisation providing frontline care Affinia healthcare are committed to making information about crime prevention available and accessible to adults using our services, and where appropriate, support people to access additional services to enhance their safety.

Recognising Abuse

The main range of different forms of abuse are described in the London multi-Agency Policy as

Disability Hate Crime

Discriminatory Abuse

Domestic Abuse

Female Genital Mutilation

Forced Marriage

Hate Crime

Honour based Violence

Human Trafficking

Mate Crime

Financial Abuse

Modern Slavery

Neglect and Acts of Omission

Organisational Abuse

Physical Abuse

Psychological Abuse

Restraint

Sexual Abuse

Sexual Exploitation

For details of all the categories of abuse please refer to the London Multi Agency Safeguarding Adults Policy 2015.

Who are adults with care and support needs?

Affinia Healthcare will strive to ensure that the adults whose use our services are safeguarded from all forms of abuse. The Section 42 duty to safeguard applies to adults who:

- Have needs for care and support;(whether or not those needs are being met)
- And are experiencing, or at risk of, abuse or neglect, and;
- Because of those care and support needs are unable to protect themselves from either the risk of, or the experience of abuse or neglect.

The following six principles as set out in guidance to the Care and Support Statutory Guidance 2014 should inform all safeguarding practice. These are as follows:

- Empowerment – People being supported and encouraged to make their own decisions and informed consent.
- Prevention – It is better to act before harm occurs.
- Proportionality – The least intrusive response appropriate to the risk presented.
- Protection – Support and representation for those in greatest need.
- Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability – Accountability and transparency in delivering **safeguarding**.

For details of all the categories of abuse please refer to the London Multi Agency Safeguarding Adults Policy 2015.

PROCEDURE

Affinia Healthcare will seek to ensure that adults who use are services are not subject to any forms of abuse.

The following procedures will be followed by all staff without exception or excuse.

Affinia Healthcare will promote the well-being of adults who use our services by providing a safe and supportive environment. It will ensure this through active care planning that involves the Adult and their family and carers where appropriate.

The Care Planning process will include the management of risk, including specific safeguarding risk, and will be reviewed on a regular basis.

This policy should be read in conjunction with Affinia Healthcare Assessment, Care Planning and the policy on safe handling of service user money and property.

This procedure should be used in conjunction with the decision making tree (Desktop Guide) in the London Multi agency Safeguarding Adults Policy and Procedure and contained in page 5 of the London Borough of Havering Safeguarding Adults Protocol.

Managers and supervisors will:

Ensure that the first priority should always be the safety and protection of adults who use our services and if medical attention is required this must be sought immediately.

The CQC must be notified by the registered manager and/or responsible individual as soon as possible.

Report:

- Staff should report suspicion or evidence of abuse to their Manager, who in turn will report to the Adult Social Care **Safeguarding** Adults Team. Staff should also use the Whistle Blowing Policy to raise concern if they are unable to discuss concerns directly with the manager.
- If staff suspect or have evidence the Registered Manager is involved in abuse, they should report directly to the **Safeguarding** Adults Team.
- It is the responsibility of everyone to act on suspicion or evidence of abuse or neglect (see Public Interest Disclosure Act 1998 and in-house procedures) and refer to the local **Safeguarding** Adults Team.
- If after referral to the **Safeguarding** Adults Team, you do not feel the concerns have been adequately addressed, you may wish to report to the Care Quality Commission (CQC).
- If staff consider a crime has been committed they can report directly to the police on 101, or 999 if there is immediate danger.

Definition of Abuse

In order to practice safeguarding effectively, it is important that staff at Affinia Healthcare understand and can recognise what abuse is, as well as any signs of abuse or neglect.

At Affinia Healthcare we **define abuse** as:

“...the harming of another individual usually by someone who is in a position of power, trust or authority over that individual. The harm may be physical, psychological or emotional or it may be directed at exploiting the vulnerability of the victim in more subtle ways (for example, through denying access to people who can come to the aid of the victim, or through misuse or misappropriation of his or her financial resources). The threat or use of punishment is also a form of abuse... In many cases, it is a criminal offence.”

Types of Abuse

Abuse takes place in all manner of forms. It is important that staff at Affinia Healthcare are aware of the wide range and manners of abuse to ensure any signs are recognised early.

Below are examples of different types of abuse. Staff are reminded **this list is not exhaustive**; it is the responsibility of all staff to **remain vigilant to all signs of abuse**.

- Physical abuse

- Bodily assaults resulting in injuries e.g. hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions;
- Bodily impairment e.g. malnutrition, dehydration, failure to thrive;
- Medical/healthcare maltreatment.

- Sexual abuse

- Rape, incest, acts of indecency, sexual assault;
- Sexual harassment or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting;
- Sexual abuse might also include exposure to pornographic materials, being made to witness sexual acts and encompasses sexual harassment/non-contact abuse.

- Psychological/emotional abuse

- Including threats of harm, controlling, intimidation, coercion, harassment, verbal abuse, enforced isolation or withdrawal from services or supportive networks;
- Humiliation;
- Bullying, shouting, swearing.

- Neglect

- Including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services;
- Withholding life's necessities, such as medication, adequate nutrition and heating.

- Financial or material abuse

- Theft and fraud;

- Exploitation, pressure in connection with Wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

- Discrimination

- Including racist, sexist, or based on a person's disability, and other forms of harassment, slurs or similar treatment.

Multiple forms of abuse may occur in an on-going relationship or abusive service setting to one person, or to more than one person at a time, making it important to look beyond single incidents or breaches in standards, to underlying dynamics and patterns of harm. **Any or all of these types of abuse may be perpetrated as the result of deliberate intent and targeting of vulnerable people, negligence or ignorance.**

At Affinia Healthcare, we hold a **zero-tolerance policy** whereby we strongly articulate that **no abuse is acceptable**; some abuse is a criminal offence and must be reported to the **Police** as soon as possible.

Rights and Responsibilities

With a view to Safeguarding, the responsibilities of Affinia Healthcare are:

1. **To ensure staff/healthcare professionals are aware of the Safeguarding Vulnerable Adults Policy and are adequately trained;**
2. **To notify the appropriate authorities if abuse is identified or suspected;**
3. **To support and, where possible, secure the safety of individuals;**
4. **To ensure that all referrals to services and authorities have full information in relation to identified risk and vulnerability;**
5. **To instruct staff to promote good practice to all healthcare professionals.;**
6. **To DBS check all healthcare professionals who have access to or work with Vulnerable Adults.**

Safeguarding is not achieved in isolation. We work in partnership with healthcare professionals and identify their responsibilities to be:

1. To be familiar with the Safeguarding Vulnerable Adults Policy and procedures;
2. To take appropriate action in line with the policies of Affinia Healthcare
3. To declare any existing or subsequent convictions. Failure to do so will be regarded as gross misconduct as per our policy disclosure.

As an employer, Affinia Healthcare has a **duty of care** towards its employees. To this end it is our responsibility to **support those who report abuse**:

All those making a complaint/allegation or expressing concern, whether they are staff, service users, carers or members of the general public, should be reassured they will be taken seriously and their comments will be treated confidentially; however, concerns may be shared if they (or others) are at significant risk. In such cases, service users will be given immediate protection from the risk of reprisals or intimidation; staff, will be given support and afforded necessary protection in line with the **Public Interest Disclosure Act 1998**.

Key Question: What are the rights of the Vulnerable Adult?

To promote safeguarding effectively, it is essential staff understand the **rights of the Vulnerable Adult**. Their rights are:

- To be made aware of this policy;
- To have alleged incidents recognised and taken seriously;
- To receive fair and respectful treatment throughout;
- To be involved in any process as appropriate;
- To receive information about the outcome.

Good Practice

At Affinia Healthcare, we implement good practice on a daily basis to ensure safe, effective and high quality services.

Recruitment:

Our recruitment procedures and policies of healthcare professionals are designed to uphold the highest levels of safeguarding. This includes:

- Enhanced DBS Disclosure checks during the selection process;
- Occupational Health checks;
- Ensure that applicant's mandatory training is up-to-date;
- References obtained and identities confirmed;
- Risk assessment of role;
- Completion of Affinia Healthcare application forms, which includes information that all staff have a duty to declare any existing or subsequent convictions.

Training:

Training/Induction includes familiarisation with all Affinia Healthcare policies and procedures. Staff are introduced to and must complete the **Safeguarding Adults: Basic Awareness in Adult Protection Staff Handbook**.

Record Keeping: A **written record** of any concerns will be kept on file. This confidential information will be stored securely and appropriately, and will be kept for as long as deemed necessary, in line with **Data Protection** principles.

All incidents should be discussed in supervision with your Line Manager.

Records kept should only include:

- Contacts made;
- Referrals made, including date, time, reasons and referral agency;
- Affinia Healthcare may have specific projects that need to keep more detailed records, and these will be identified by the Team Leader and made known to the team.

Planning: Healthcare professionals should inform all Vulnerable Adults in their care of their right to talk with an independent person within Affinia Healthcare. This should form part of the normal registration process.

Key Contacts

The Safeguarding Officer for *Affinia Healthcare* is: Chinonso Kalu

Contact details are: Email: chinny_affiniahealthcare@gmx.co.uk

Havering Safeguarding Adults Team: Mercury House, Mercury Gardens, RM1 3SL

Email- safeguarding_adults_team@haverling.gov.uk; Tel:- 01708433550

Care Qualities Commission Contact Centre:- 03000616161

Identification of Abuse

At Affinia Healthcare we understand abuse can be perpetrated and shown in many ways. Abuse can also happen anywhere and be carried out by anyone e.g., Informal carer's, family, friends, neighbours, paid staff, volunteers, other service users and strangers or tenants. Staff should be vigilant of all of the following signs and act on any other signs they may feel concerned about.

- Physical Abuse Signs

- A history of unexplained falls or minor injuries;
- Bruising in well protected areas, or clustered from repeated striking;
- Finger marks;
- Burns of unusual location or type;
- Injuries found at different states of healing;
- Injury shape similar to an object;
- Injuries to head/face/scalp;
- History of GP or agency hopping, or reluctance to seek help;
- Accounts, which vary with time or are inconsistent with physical evidence;
- Weight loss due to malnutrition, or rapid weight gain;
- Ulcers, bedsores and being left in wet clothing;
- Drowsiness due to too much medication, or lack of medication causing recurring crises/hospital admissions;

Note: Some ageing processes can cause changes which are hard to distinguish from some aspects of physical assault e.g. skin bruising can occur very easily due to blood vessels becoming fragile.

- Sexual Abuse Signs

- Disclosure or partial disclosure (use of phrases such as '*it's a secret*');
- Medical problems, e.g. genital infections, pregnancy, difficulty walking or sitting;
- Disturbed behaviour e.g. depression, sudden withdrawal from activities, loss of skills, sleeplessness/nightmares, self-injury, showing fear/aggression to one particular person, repeated or excessive masturbation, inappropriately seductive behaviour, loss of appetite/difficulty in keeping food down;
- Behaviour of others towards the Vulnerable Adult.

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- **Psychological/Emotional Abuse Signs**

- Isolation;
- Unkempt, unwashed, smell;
- Over meticulous;
- Inappropriately dressed;
- Withdrawn, agitated, anxious not wanting to be touched;
- Change in appetite;
- Insomnia, or need for excessive sleep;
- Tearfulness;
- Unexplained paranoia or excessive fears;
- Low self esteem;
- Confusion.

- **Neglect Signs**

- Poor physical condition;
- Clothing in poor condition;
- Inadequate diet;
- Untreated injuries or medical problems;
- Failure to be given prescribed medication;
- Poor personal hygiene.

- **Financial or Material Abuse Signs**

- Unexplained or sudden inability to pay bills;
- Unexplained or sudden withdrawal of money from accounts;
- Disparity between assets and satisfactory living conditions;
- Extraordinary interest by family members and other people in the vulnerable person's assets.

- **Discriminatory Abuse Signs**

- Lack of respect shown to an individual;
- Signs of substandard service offered to an individual;
- Exclusion from rights afforded to others (i.e. health, education, criminal justice).

- **Other Signs of Abuse**

- Inappropriate use of restraints;
- Sensory deprivation e.g. spectacles or hearing aid;
- Denial of visitors or phone calls;
- Failure to ensure privacy or personal dignity;
- Lack of flexibility of choice e.g. bedtimes, choice of food;
- Restricted access to toilet or bathing facilities;
- Lack of personal clothing or possessions;
- Controlling relationships between care staff and service users;
- Any errors in medication administration.

Abuse & Recognising the Signs

This section of our Safeguarding Vulnerable Adults Policy has highlighted that **abuse can happen at any time and in any place and can be perpetrated by anyone.**

At Affinia Healthcare staff have a **duty of care** towards all service users and colleagues. It is your responsibility to **remain vigilant** towards to presence and perpetration of abuse and **act quickly** as soon as signs of abuse have been identified by confiding in your Line Manager or other Senior member of staff.

What to Do

Any member of staff who suspects abuse or notices any of the signs listed above **must immediately make their concerns known** to Affinia Healthcare. Action should also be taken if it is felt that colleagues are not following the Affinia Healthcare **Protection of Vulnerable Adults Policy and Guidelines.**

All allegations or suspicions are to be treated seriously. No abuse is acceptable and some abuse is a criminal offence and must be reported to the Police as soon as possible. To determine the appropriate action, it is important to consider:

- **Risk**– Does the Vulnerable Adult or staff member understand the nature and consequences of any risk they may be subject to, and do they willingly accept such a risk?
- **Self-determination**– Is the Vulnerable Adult able to make their own decisions and choices, and do they wish to do so?
- **Seriousness** – A number of factors will determine whether intervention is required. The perception of the victim must be the starting point.

Key Question: What are factors that determine whether intervention is required?

Affinia Healthcare acknowledges that reporting safeguarding concerns is an **extremely sensitive issue** for staff and assures all staff and persons working on its behalf that it will fully support and protect anyone, who in good faith, reports a concern that a colleague is, or may be, abusing Vulnerable Adult.

Information to Record: In all situations, including those in which the cause for concern arises from a disclosure made in confidence, it is vitally important to record the details of an allegation or reported incident, regardless of whether or not the concerns are shared with a statutory agency.

As far as possible an accurate note should be made of:

- **The date and time of the incident and disclosure;**
- **The parties who were involved;**
- **What was said and done by whom;**
- **Description of any visible injuries or bruising;**
- **Any further action taken by Affinia Healthcare to investigate the matter;**
- **Any further action e.g. the suspension of a worker;**
- **Where relevant, reasons why there was no referral to a statutory agency;**
- **The full name of the person(s) reporting and to whom reported.**

Records and reports should be stored securely and shared only with those who need to know. **All referrals made to Social Services or the Police should be confirmed in writing and followed up with a copy of the incident report within 24hrs. Social Services should acknowledge your written referral within one working day of**

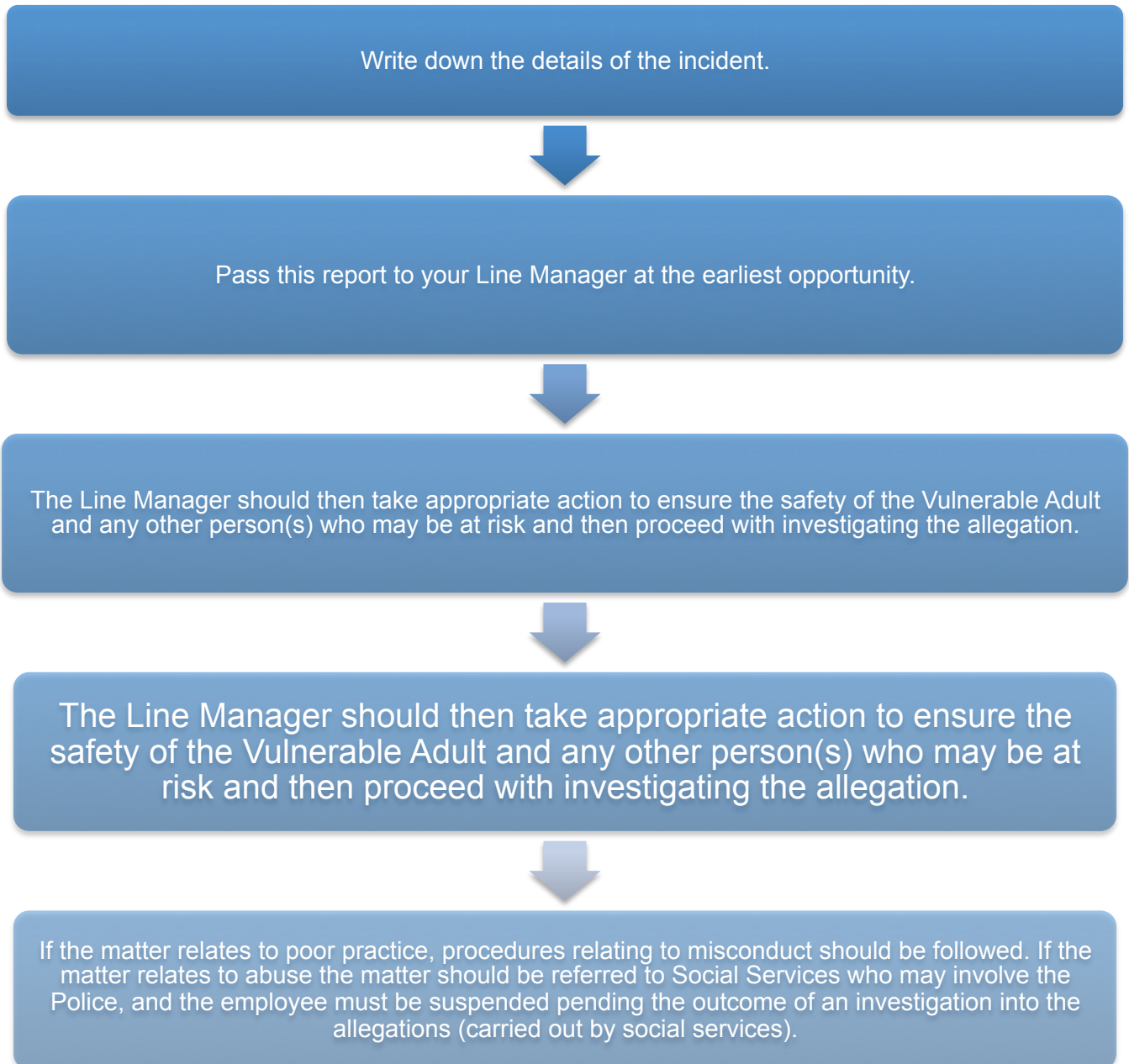
receiving it; if you have not heard back within 3 working days, contact Social Services again.

You should also record the Social Services member of staff to whom concerns were passed and the date and time of the call and subsequent letters sent.

These procedures not only serve to protect Vulnerable Adult, but also protect the employees.

Reporting Safeguarding Concerns

When **reporting a safeguarding concern**, the following **guidelines** should be adhered to:



Information requested by another organisation

The safety and well-being of the Vulnerable Adult overrides considerations of confidentiality. However, every effort should be made to ensure that confidentiality is maintained for all concerned both when the allegation is made and whilst it is being investigated.

Affinia Healthcare has a duty to share information with other agencies and authorities if requested in connection with an assessment of a Vulnerable Adult. or in connection with court proceedings. Although the Data Protection Act 1998, Human Rights Act 1998 or common law duty of confidence would need to be considered the welfare of the Vulnerable Adult would normally override the need to keep the information confidential.

To ensure rigorous investigation, this policy will also be used in conjunction with:

- Disciplinary Procedure, Grievance Procedure and Whistle Blowing Policy.
- Data Protection Policy.
- IT Acceptable Use Policy.
- Equalities Policy.
- Corporate Complaints procedure.
- Harassment and Bullying Policy.
- Health & Safety at Work guidance.

The Deprivation of Liberty Safeguards

The Deprivation of Liberty Safeguards (DoLS) were introduced into the Mental

Key Question: What is a Deprivation of Liberty>

Capacity Act 2005 through the Mental Health Act 2007.

What are the Deprivation of Liberty Safeguards?

The Deprivation of Liberty Safeguards are part of the Mental Capacity Act and came into effect in April 2009. They apply to anyone who:

- Is aged 18 or over
- Is suffering a 'disorder or disability of the mind'
- Lacks the capacity to give consent to their care/treatment
- Is receiving care or treatment that might amount to a deprivation of liberty under Article 5 of the European Declaration of Human Rights.

If there is no alternative but to deprive such a person of their liberty, the Deprivation of Liberty Safeguards say that a care provider must apply to the supervisory body for authorisation. The supervisory body is the Local Authority or Clinical Commissioning Group that commissions the service.

The Supervisory Body is responsible for commissioning the required mental capacity and other assessments to determine whether the person concerned:

- comes under the protection of DoLS
- is deprived of their liberty,
- and if so, whether it is in their best interests.

A case conference will be held to discuss the potential deprivation of liberty and what is in the person's best interests. All parties involved in the person's care will be invited to attend and put forth their views and concerns. If the Supervisory Body authorises a deprivation of liberty, this will be for a limited time (up to a maximum of 12 months) and the Supervisory Body may put conditions in place to make sure the person's welfare is safeguarded.

The Supervisory Body will also make sure that the person being deprived of liberty has a 'Representative' who will keep in touch with the person, support them in all matters regarding the authorisation, and ask for a review of the authorisation when necessary. This Representative would usually be a family member or friend. In the absence of anyone suitable, the Supervisory Body will arrange a paid advocate.

The Safeguards also allow people the right of appeal against a decision in a court of law.

Monitoring and Review

The Registered Proprietor, Chinonso Kalu, will check this policy is working properly and they will review it at least once a year. We will make improvements to the policy wherever we can.

Employees are invited to suggest any ways the policy can be improved.

Key Points to Take Away

- Abuse takes place in all manner of forms. It is important that staff at Affinia Healthcare are aware of the wide range and manners of abuse to ensure any signs are recognised early.
- Any member of staff who suspects abuse or notices any of the signs listed above must immediately make their concerns known to Affinia Healthcare
- it is vitally important to record the details of an allegation or reported incident
- The safety and well-being of the Vulnerable Adult overrides considerations of confidentiality. However, every effort should be made to ensure that confidentiality is maintained for all concerned both when the allegation is made and whilst it is being investigated.
- Affinia Healthcare has a duty to share information with other agencies and authorities if requested in connection with an assessment of a Vulnerable Adult

Authorisation and Signature

This Policy is the authorised version agreed by the Directors of Affinia Healthcare. All employees are expected to follow this policy and failure to do so could result in disciplinary action.



Chinonso Kalu

Registered Proprietor

28/03/2017