



Feedback for the DoH Safeguarding Policy Consultation Process

March 2024

Shine welcomes the development of the Adult Safeguarding policy and the wide consultation process to include the views of people with lived experience. Our feedback includes comments raised by our staff as well as members of The Voice Platform, a group comprising over 50 individuals with lived experience, family members, and supporters who voluntarily collaborate with us on initiatives such as this, to improve mental health support, services, policy and legislation in Ireland.

Human Rights approach to the Adult Safeguarding Policy

A Human Rights based approach is essential when developing an Adult Safeguarding policy. This approach aligns with the principles of dignity, respect, and fairness. It not only protects vulnerable individuals, but also empowers them to actively participate in the decisions that impact their lives.

1. Shine strongly suggests replacing the term 'service user' by 'person with lived experience'. This expression recognises the individual's humanity beyond their role as a recipient of services. It shifts the focus from a transactional relationship to one that acknowledges their unique life journey and personal context. We also suggest referring to 'adults at risk of abuse' instead of using the term 'vulnerable person'. The former aligns with human rights principles, including the UN Convention on the Rights of Persons with Disabilities (UNCRPD) and Assisted Decision-Making Capacity legislation. In contrast, the latter does not adequately capture the rights-based approach.
2. To align the policy with fundamental human rights principles, people who use safeguarding services need to be placed at the centre, recognised as right holders. This approach acknowledges that every person, regardless of their circumstances, has inherent rights to safety, dignity and autonomy. Positioning people as rights holders is empowering. It shifts the focus from passive recipients of services to active participants who can exercise their rights.

Education, Information, Training and Co-production

Adult safeguarding education and training will ensure that health staff are well prepared to protect adults at risk of abuse, support them in upholding their rights and contributing to safer healthcare environments. It will equip health care workers with knowledge and skills to understand their legal and ethical duties regarding safeguarding, and to confidently navigate complex situations and take appropriate action. The development of such training must follow a co-production approach, as this will ensure that content and methodology is relevant, participatory and effective, ultimately enhancing empowerment and protection.

3. The policy should clearly state that mandatory adult safeguarding training should apply to all health staff, regardless of their roles. This ensures a consistent and comprehensive approach to safeguarding.
4. Shine strongly suggests a co-production process to develop safeguarding training modules, including health staff and people with lived experience, family members and supporters. Their voices will guarantee diverse perspectives enriching the training content and will ensure it resonates with real-life experiences. When co-produced, the training will address the specific needs and challenges faced by adults at risk of abuse as well as health staff.
5. To ensure the safety and well-being of adults at risk of abuse, a nationwide government-led information campaign is needed. This campaign will equip adults at risk of abuse, their family members and carers with essential information regarding the safeguarding policy and practical steps for its effective implementation.

Intergovernmental collaboration and partnership bridges with the community and voluntary sector

Shine appreciates the collaboration between the Department of Health and the Department of Children, Equality, Disability, Integration and Youth in the development of this draft policy. However, we acknowledge that risk factors for adults encompass (not exclusively) inadequate housing, substance misuse, disadvantaged neighbourhoods, limited income prospects, social isolation, lack of access to education and training, stigma and challenging labour conditions amongst others. Collaboration across various relevant government departments will be essential for a comprehensive and integral approach to adult safeguarding. The community and voluntary sector also play a crucial role in adult safeguarding, ensuring the well-being, participation and safety of adults at risk of abuse through our work on advocacy and awareness, support services, prevention and early intervention, capacity building and training.

6. Shine strongly suggests the inclusion of a clear collaboration roadmap across different Government Departments in the policy.
7. We also encourage the development of a comprehensive map of relevant organisations within the community and voluntary sector. Additionally, we emphasise the need to establish collaboration channels that define clear roles, responsibilities and allocate resources for effective implementation.

Independent and confidential unit for case analysis

Having an independent and confidential unit for case analysis in adult safeguarding will contribute to a safer environment for adults at risk of abuse, through promoting objectivity and impartiality, trust and confidentiality, learning and improvement as well as accountability and transparency.

8. The policy should include the creation of an independent statutory unit for adult safeguarding, led by professionals and operating independently from the Health Service Executive (HSE). This agency should prioritise a holistic, multidisciplinary approach, centred on human rights and equipped with legal authority mechanisms and effective budget and oversight.

Independent group of people with lived experience (Reference Group) to monitor the Adult Safeguarding policy implementation

In November 2021 Shine was selected to host the Sharing the Vision Reference Group (RG). The RG was established by the National Implementation and Monitoring Committee (NIMC) who oversee implementation of Sharing the Vision: Ireland's mental health policy to ensure that the voices of lived experience are consulted on an ongoing basis in the roll-out of this important national policy. The group has reviewed 8 quarterly reports to date, contributing with invaluable insights that are shaping key decision making in mental health services design and provision. Shine remains available to share our experience and contribute to learning, should the Department of Health decide to duplicate this model.

9. Learning from our positive experience, we strongly suggest the setting up of a national reference group with lived experience on adult safeguarding to monitor the implementation of the policy.
10. Shine strongly suggests the launch of an advertisement campaign to select an independent organisation from the community and voluntary sector to host the Adult Safeguarding Reference Group.