



Review Sheet		
Last Reviewed 03 Nov '23	Last Amended 03 Nov '23	Next Planned Review in 12 months, or sooner as required.
Business impact	<p>Changes are important, but urgent implementation is not required, incorporate into your existing workflow.</p> <p>MEDIUM IMPACT</p>	
Reason for this review	Scheduled review	
Were changes made?	Yes	
Summary:	This policy has been reviewed and continues to support staff in the process of initial disclosure to resolution, giving an insight into how this process works. Underpinning Knowledge and Further reading links have also been reviewed to ensure they remain current.	
Relevant legislation:	<ul style="list-style-type: none"> • The Care Act 2014 • Equality Act 2010 • Health and Social Care Act 2008 (Registration and Regulated Activities) (Amendment) Regulations 2015 • Human Rights Act 1998 • Mental Capacity Act 2005 • Safeguarding Vulnerable Groups Act 2006 • UK GDPR 	
Underpinning knowledge - What have we used to ensure that the policy is current:	<ul style="list-style-type: none"> • Author: GOV UK, (2010), <i>Equality Act 2010</i>. [Online] Available from: https://www.legislation.gov.uk/ukpga/2010/15/contents [Accessed: 3/11/2023] • Author: CQC, (2023), <i>Regulation 13: Safeguarding service users from abuse and improper treatment</i>. [Online] Available from: https://www.cqc.org.uk/guidance-providers/regulations-enforcement/regulation-13-safeguarding-service-users-abuse-improper [Accessed: 3/11/2023] • Author: Anti-Bullying Alliance, (2023), <i>United against bullying</i>. [Online] Available from: https://www.anti-bullyingalliance.org.uk/ [Accessed: 3/11/2023] • Author: The Care Quality Commission, (2023), <i>Report a concern if you are a member of staff</i>. [Online] Available from: https://www.cqc.org.uk/contact-us/report-concern/report-concern-if-you-are-member-staff [Accessed: 3/11/2023] 	
Suggested action:	<ul style="list-style-type: none"> • Encourage sharing the policy through the use of the QCS App 	
Equality Impact Assessment:	QCS have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.	



1. Purpose

1.1 To ensure that all Care staff understand the roles and responsibilities they may have and they have an awareness of the nature of bullying and its consequences for Service Users' mental health and wellbeing.

1.2 The policy and procedure has been designed to minimise bullying and give Care guidance on how to respond when supporting a Service Users, both as a victim or perpetrator.

1.3 Medcom Personnel Ltd recognises the need for this policy in order to demonstrate that we take all bullying allegations seriously and Service Users should be assured that they will be supported if they report these incidents.

This policy is also affected by policies and procedures at Medcom Personnel Ltd for:

- | Safeguarding
- | Raising Concerns, Freedom to Speak Up and Whistleblowing
- | Harassment
- | Confidentiality
- | Data Security
- | Data Protection

1.4 To support Medcom Personnel Ltd in meeting the following Key Lines of Enquiry/Quality Statements (New):

Key Question	Key Lines of Enquiry	Quality Statements (New)
CARING	C1: How does the service ensure that people are treated with kindness, respect and compassion, and that they are given emotional support when needed?	QSC1: Kindness, compassion and dignity
CARING	C3: How are people's privacy, dignity and independence respected and promoted?	QSC1: Kindness, compassion and dignity QSC3: Independence, choice and control
EFFECTIVE	E2: How does the service make sure that staff have the skills, knowledge and experience to deliver effective care and support?	QSE2: Delivering evidence-based care & treatment QSE3: How staff, teams & services work together
RESPONSIVE	R2: How are people's concerns and complaints listened and responded to and used to improve the quality of care?	QSR4: Listening to and involving people
SAFE	S1: How do systems, processes and practices keep people safe and safeguarded from abuse?	QSS3: Safeguarding
SAFE	S6: Are lessons learned and improvements made when things go wrong?	QSS1: Learning culture
WELL-LED	W1: Is there a clear vision and credible strategy to deliver high-quality care and support, and promote a positive culture that is person-centred, open, inclusive and empowering, which achieves good outcomes for people?	QSW1: Shared direction and culture QSW2: Capable, compassionate and inclusive leaders



1.5 To meet the legal requirements of the regulated activities that Medcom Personnel Ltd is registered to provide:

- | The Care Act 2014
- | Equality Act 2010
- | Health and Social Care Act 2008 (Registration and Regulated Activities) (Amendment) Regulations 2015
- | Human Rights Act 1998
- | Mental Capacity Act 2005
- | Safeguarding Vulnerable Groups Act 2006
- | UK GDPR



2. Scope

2.1 The following roles may be affected by this policy:

- | All staff

2.2 The following Service Userss may be affected by this policy:

- | Service Userss

2.3 The following stakeholders may be affected by this policy:

- | Family
- | Advocates
- | Representatives
- | Commissioners
- | External health professionals
- | Local Authority
- | NHS



3. Objectives

3.1 To clearly state the commitment of Medcom Personnel Ltd regarding anti-bullying.

3.2 To clarify the meaning and main types of bullying and consequences.

3.3 To provide a clear framework of roles and responsibilities to be followed by Care staff receiving an allegation of bullying.

3.4 To provide support to Service Userss so that they know what to do if they are being bullied.

3.5 To provide accessible information where it is required to support Service Userss.



4. Policy

4.1 Bullying

"Bullying" is a behaviour that can be very harmful to the Service Users who is being bullied. It can affect individuals physically and psychologically. It is known that bullying behaviour usually has four features.

- | **Repetition, persistence:** Episodes of bullying, even just a single event, can have a long-term impact on an individual, just the same as persistent bullying can have as part of a continual pattern of bullying - to the person being bullied this can be both threatening and intimidating
- | **Intentionally harmful:** But this is not always the intention of the person bullying
- | **Imbalance of power:** The victim of bullying very often feels helpless in preventing or stopping it
- | **Feelings:** Fear, loneliness, distress that in turn lead to a lack of confidence

4.2 Bullying can be Carried out in so Many Different Ways:

- | **Banter:** Although playful and fun, banter turns to bullying when the individual experiences this in a negative way
- | **Cyber:** Can happen across the internet, email, in a chat room, on social media
- | **Emotional:** Being unfriendly, excluding someone, tormenting and teasing
- | **Homophobic:** Focusing on sexuality, how someone dresses, grooming, behaviour
- | **Mobile:** Texting, messaging and nuisance calls, using technology, (camera and video to carry out 'Happy Slapping' or getting someone to perform on camera and sharing it)
- | **Mate Hate:** Exploiting someone, abuse or theft by those they consider to be their friends - often referred to as 'fake friends'
- | **Physical:** Pushing, kicking, hitting, punching - any use of violence
- | **Racism:** Taunting, teasing, graffiti, gestures
- | **Sexual:** Any unwanted physical contact, sexually or sexually abusive comments, sharing porn or asking to make porn images
- | **Verbal:** Name calling, sarcasm, spreading rumours, teasing, whispering

4.3 For the Service Users being bullied, they are often seen as a victim, an easy target, so bullying over time can have some devastating and often life changing effects - these are just some examples of the effects of bullying:

- | Isolated, alone, unimportant, undervalued, no one to talk to
- | Afraid to go out or mix with others
- | Different, not knowing why, unaccepted to be a part of a community or group
- | Physically hurt - by the person bullying or it could lead to self-harming
- | Mentally hurt, distressed
- | Unsafe, frightened, not knowing who to trust after "mate hate"
- | Unable to see a future for yourself
- | Self-Harm, suicidal thoughts as an escape

4.4 Signs and Symptoms

Spotting the signs and symptoms of bullying can be extremely difficult and staff understand from safeguarding training that these could indicate other factors too.

Be aware of possible signs and discuss with Mrs Irene Mtisi immediately if any concerns are noted or there are no valid explanations for the following:

- | Frightened of taking part in activities
- | Does not want to go out
- | A change to their routine
- | Withdrawn, anxious, or reduction in confidence
- | Has possessions which are damaged or missing
- | Short of money, other Service Users' money going missing



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- | Unexplained injuries, cuts or bruises
- | Aggressive or disruptive
- | Attempting self-harm or threatening suicide
- | Withdraws from using the Internet or mobile phone
- | On edge when social media or phone messages are received
- | Flinches around others, avoiding certain people
- | Changes in appearance and dress code, covering up
- | Other changes in behaviour that you notice are not the norm for a particular Service Users

4.5 The Commitment of Medcom Personnel Ltd

Medcom Personnel Ltd takes seriously any allegation of bullying no matter what the source of the information is.

Service Users who feel that they are being bullied or any person reporting episodes of bullying can be reassured to know that the allegation will be taken seriously and investigated fully.

When a Service User makes an allegation to Care staff it is important to give reassurance but not to make any promises about the outcome.

Why is this?

Although not always the case, it is possible that the person who is being accused of bullying will make allegations too against the alleged victim.

The full picture on the situation may only become clearer once investigated from both sides' perspectives.



5. Procedure

5.1 Disclosure

A Service User asks to speak to a Care worker in confidence. It is important that the response should make clear that any information that involves safety or safeguarding concerns may have to be shared but reassure them about this.

The Service User discloses that they or another Service User are being bullied:

Do:

- | Tell them you will need to share this with Mrs Irene Mtisi
- | Stay calm
- | Reassure them
- | Ensure immediate safety
- | Document the conversation fully, using the exact words
- | Try to find out: dates / times, places, names of the bully / bullies. Sometimes they are reluctant to share this information in case the bully finds out

Do not:

- | Confront any alleged bullies
- | Make any promises
- | Tell everyone
- | Make your own judgement

At every stage, reassurance must be given to both the alleged victim and alleged bully.

5.2 Incident Reporting

Immediately, following disclosure, the Care Worker should complete an incident form, complete an entry into the Service User's daily notes and report the concern immediately to Mrs Irene Mtisi or the senior person on duty.

Following discussion with Mrs Irene Mtisi, it may be necessary to contact the police or the Essex County Council Safeguarding Team for further advice.

Information should also be shared with other Care staff on duty who may at some point be working with the Service Users involved.

Attention should also be given to the alerter as they may need further reassurance following the alert.

Remember:

Document all discussions and actions as soon as possible as they may be used later in an investigation.

5.3 Investigation

Investigations into allegations of abuse vary in what they look like. They may be carried out by Mrs Irene Mtisi or someone from the Essex County Council Safeguarding Team and the Police.

However, the processes are very similar regardless of who does these as "Bullying" falls under Safeguarding guidance.

Mrs Irene Mtisi will ensure the safety of all involved and, following discussions with Essex County Council, they may produce what is known as a "**Risk Management Plan.**" This will give a plan of action as to how Medcom Personnel Ltd will manage the current situation during any investigation and how it intends to prevent further episodes.

Any investigation will start off with the alleged victim by asking '**What would you like the outcome to be?**' The investigator will also ensure that the Service User's expectations are realistic.

The person carrying out the investigation may not need to interview everyone if records are sufficient, evidence is clear or the bully admits bullying.

They will produce a detailed report which sets out very clearly how they carried out the investigation, who was involved, any evidence, a conclusion and recommendations.

The report will be shared with those involved in the process and is classed as a confidential report.

If the report was carried out internally, it may need to be shared with Essex County Council and the Care Quality Commission

When sharing information is required this will be done so in line with the UK GDPR and Data Protection Policies and Procedures at Medcom Personnel Ltd.

5.4 Outcome from Investigation



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The intention of any investigation is to achieve some closure and reconciliation.

Outcomes may involve:

- | An apology
- | A change in behaviour
- | A change of placement
- | A criminal record

It is important that both the victim, bully and person who made the original disclosure all receive feedback in order to demonstrate that they are being listened to and that their concerns were taken seriously. This can be done by having a face-face meeting but in all cases, a formal letter will also be given explaining in detail the outcomes.

Medcom Personnel Ltd will review Care Plans and also carry out a lessons learnt process in order to prevent the same issues happening again in future. As part of this period of reflection, Medcom Personnel Ltd will also discuss if any process needs to change and if any other improvements can be made such as training.



6. Definitions

6.1 Risk Management Plan

- | A written risk management plan raises awareness of potential safeguarding issues and provides a clear line of accountability and actions for safeguarding vulnerable adults from harm

6.2 Disclosure

- | Disclosure is the process of making information or facts known to others

6.3 Mate Hate

- | Mate hate is when someone pretends to be your friend in order to take advantage of you, for example, stealing your property or asking for money a lot. When you refuse, they can pressure you and make you feel uncomfortable until you do what they want

6.4 Happy Slapping

- | Is when someone uses a phone or video camera to film someone being slapped or attacked



Key Facts - Professionals

Professionals providing this service should be aware of the following:

- | Outcomes will be given to all involved in bullying issues with recommendations and lessons learnt
- | All allegations of bullying will be taken seriously and investigated under Essex County Council Safeguarding guidelines
- | All allegations of bullying will be taken seriously and reported as such whether formal or informal resolution has taken place
- | Attempts will be made to resolve issues and allegations of bullying informally where possible



Key Facts - People affected by the service

People affected by this service should be aware of the following:

- | As part of the zero tolerance approach at Medcom Personnel Ltd, you will be fully supported to access the process and stand up to bullies
- | Bullying is a safeguarding concern and every case will be treated as such
- | As a result of 'Making Safeguarding Personal', the alleged victim will always lead the process



Further Reading

As well as the information in the 'underpinning knowledge' section of the review sheet we recommend that you add to your understanding in this policy area by considering the following materials:

Family Lives - Bullying:

<https://www.familylives.org.uk/advice/bullying/advice-for-parents>

Mencap - Bullying:

<https://www.mencap.org.uk/advice-and-support/bullying>

Alzheimer's Society - Aggressive Behaviour and Dementia:

<https://www.alzheimers.org.uk/about-dementia/symptoms-and-diagnosis/symptoms/aggressive-behaviour-and-dementia>



Outstanding Practice

To be 'outstanding' in this policy area you could provide evidence that:

- | Incidents are fully investigated, recommendations are made and lessons are learnt to prevent future episodes
- | The alleged victim is at the centre of the decision-making process that is outcome focused
- | Allegations are taken seriously, investigated and reported through appropriate channels
- | A clear anti-bullying culture exists to demonstrate the anti-bullying agenda at Medcom Personnel Ltd
- | The wide understanding of the policy is enabled by proactive use of the QCS App



Forms

Currently there is no form attached to this policy.