



SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

Last Review:	December 2014
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Next Review:	December 2015

Vision

Loreto College is centred in God, rooted in Christ and animated by the spirit of Mary Ward, the founder of the Institute of the Blessed Virgin Mary. Our vision is that it will be an educational community where each person has the experience of being loved and valued as a sacred individual created by a loving God; a community where students enjoy an enriching and liberating education that helps them grow into the fullness of life and empowers them to be men and women of courage who are alive to the needs of humanity and committed to making a better world.

Introduction

The College aims to be an educational community which gives expression to the core values of Mary Ward - freedom, justice, sincerity, truth, joy, excellence and internationality.

Loreto College has the highest expectations of personal, academic and professional excellence. This document sets out the College's policy and guidance on the procedures it will follow relating to safeguarding of children and vulnerable adults. The college will endeavour to act at all times with justice, compassion and respect for the dignity and worth of all members of the college community but In doing so it will act in accordance with its legal responsibilities and its primary duty of care to children and vulnerable adults for whom it is responsible.

Preamble

Loreto College's statement of safeguarding policy aims to:

- incorporate the statutory requirements placed on the College;
- to ensure the safety and welfare of our students;
- to promote the training and development of staff within the workplace and learning environment;
- to embed a positive safeguarding culture which allows learning to proceed in such a way to ensure the safety of all
- link into other relevant college policies

Loreto College recognises that members of staff and learners have an important role to play in safeguarding the welfare of children and vulnerable adults and preventing their abuse. All matters relating to concerns around Safeguarding Children and Vulnerable Adults must be referred to the designated member of staff, Mrs A. Pritchard on 0161 226 5156 ext. 391. The designated governor is Sister Patricia Goodstadt.

It is the policy of Loreto College to work with the local Safeguarding Children Board, the police and social care while always placing the welfare of the child or vulnerable adult at the centre of any actions taken.

A formal report will be made to the governors on numbers of interventions and, if appropriate, outcomes of any interventions. The report will be limited in its content to ensure the protection of those involved.

Linked Policies/Procedures:

Anti-Bullying Policy	Anti-Drugs Policy
Code of Respect	Computer Code of Conduct
Student Behaviour Policy	Student Charter
Single Equality Scheme	Whistleblowing Policy
Disciplinary Procedure - Misconduct	Code of Conduct Staff
Policy of Race Equality	Learner Involvement Strategy
Recruitment and Selection Policy	Shielding Policy
Equal Opportunity Policy	Harassment Policy

1. Background

- 1.1 Loreto College recognises that members of staff and learners have an important role to play in safeguarding the welfare of children and vulnerable adults and preventing their abuse.
- 1.2 This procedural document is designed to provide a basic procedure that should be followed in all cases.

2. Safer Recruitment and Selection

- 2.1 Loreto College is committed to Safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. The college places the Safer Recruitment of Staff as the highest priority along with all other Safeguarding and Child Protection policies and Procedures and will prevent unsuitable people from joining the workforce. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and, where appropriate, undertaking DBS checks.
- 2.2 Statutory changes, underpinned by regulations, are that:
 - The College will meet the requirements of the Disclosure and Barring Service.
 - A DBS Disclosure is obtained for **all** new appointments to the college's workforce.
 - College must keep a single central record detailing a range of checks carried out on their staff.
 - All new appointments to the college workforce who have lived outside the UK are subject to additional checks as appropriate.
 - The College must satisfy itself that supply staff have undergone the necessary checks.
 - Identity checks must be carried out on all appointments to the College workforce before the appointment is made.

3. Safeguarding Information for Learners

3.1 The college is committed to ensuring that learners are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All learners know that we have a senior member of staff with responsibility for safeguarding and know who this is. We inform learners of whom they might talk to, both in and out of college, their right to be listened to and heard and what steps can be taken to protect them from harm. Materials we use to help learners know how to keep safe are referred to in Tutorial Handbooks and Assembly Notices.

4. Partnership with Parents

4.1 The college shares a purpose with parents to keep children safe from harm and to have their welfare promoted.

4.2 We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to protect a child.

4.3 College will share with parents any concerns we may have about their child unless to do so may place a child at risk of harm.

4.4 We encourage parents to discuss any concerns they may have with the appropriate Senior Tutor.

4.5 We tell parents in our Prospectus of our commitment to Child Protection

5. Categories of Abuse

Safeguarding and promoting the welfare of children/students is defined for the purposes of this guidance as: protecting children students / from maltreatment; preventing impairment of children's/ students health or development; ensuring that children/ students grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children/ students to have the best outcomes.

Children/ students includes everyone under the age of 18.

Where a child/ student is suffering significant harm, or is likely to do so, action should be taken to protect that child/ student. Action should also be taken to promote the welfare of a child/ student in need of additional support, even if they are not suffering harm or are at immediate risk.

There are four key categories of abuse:

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

5.1. Physical Abuse

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

5.2. Emotional Abuse

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

5.3. Sexual Abuse

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

5.4. Neglect

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Violent Extremism

The college also seeks to help prevent harm from violent extremism, either from the effects of this or from vulnerable students being recruited into carrying out acts of violence against others.

Factors leading to VE:

- Search for answers – extremism in identity, faith and need to belong
- Desire for adventure/excitement
- Desire to enhance self-esteem
- Identifying with a charismatic individual/group that offers social support
- Sense of grievance triggered by personal experience of racism/discrimination/aspects of government policy etc.

Behavioural indicators:

- Major behavior changes
- Change in appearance
- Talks about another person who exerts a lot of influence
- Isolated from peers, associates with only 1 group of people, withdrawal from family members
- Additional vulnerability risk factors: SEN, Mental Health Issues, Alcohol and Drug abuse, MFH

6. The Governing Body should ensure that: It provides a safe environment for its students.

6.1 The college has a safeguarding policy and procedures in place that are in accordance with local authority guidance and locally agreed inter-agency procedures, and the policy is made available to parents on request.

6.2 The college identifies student who are suffering, or at risk of suffering harm and takes appropriate action to see that these young people are kept safe.

6.3 The college operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children.

6.4 The college has procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures.

6.5 A member of the college's senior management team is designated to take lead responsibility for child protection.(The Designated Member of Staff)

6.6. Staff undertake appropriate safeguarding training.

6.7.They remedy, without delay, any deficiencies or weaknesses regarding safeguarding arrangements.

6.8. A governor is nominated to be responsible for liaising with the LA and/or partner agencies in the event of allegations of abuse being made against the Principal.

6.9. Where services or activities are provided on the college premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding and liaises with the college on these matters where appropriate.

6.10. They review their policies and procedures annually.

6.11 The Governors ensure the student's wishes or feelings are taken into account when determining what action to take and what services to provide to protect individual student's by ensuring there are systems in place for student's to express their views and give feedback.

6.12 Governors are provided with updates as to how students are informed how to safeguard themselves via the tutorial system, RE, assemblies etc.

7. The Designated Member of Staff

7.1. The Designated Member of Staff with lead responsibility for safeguarding children and vulnerable adults is Mrs Andrea Pritchard, Head of Student Services, who can be contacted on 0161 226 5156. It will be the responsibility of the Head of Student Services to review and monitor the procedures and to seek the advice of the local Safeguarding Children Board and local authority social care department and to bring about a change in procedures if necessary.

7.2. Further, it is the responsibility of the Designated Member of Staff to ensure that this policy is reviewed annually and that appropriate staff development is in place and that all staff have a general awareness of safeguarding children and vulnerable adult protection issues.

7.3. Other members of staff will be trained as Designated Safeguarding Officers to ensure that appropriately trained personnel are available in the absence of the Designated Member of Staff.

7.4. The designated member of staff is responsible for:

- Overseeing the referral cases of suspected abuse or allegations to the relevant Social Services Department.
- Providing advice and support to other staff on issues relating to child protection.
- Maintaining a proper record of any child protection referral, complain or concern (even where that concern does not lead to a referral).
- Ensuring that parents of children and young people within the College are aware of the College's safeguarding policy.
- Liaising with appropriate agencies.
- Liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for the pupils.
- Liaising with employers and training organisations that receive children or young people from the College on long-term placements to ensure that appropriate safeguards are put into place.
- Ensuring that staff receive basic training in child protection issues and are aware of the College child protection procedures.
- Reporting annually to the governing body of the College on how the College has discharged its duties. She/he is responsible for the reporting deficiencies in procedure to the governing body at the earliest opportunity.
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.

8. All Staff

- 8.1. Will attend annual INSET on Safeguarding issues so that they can recognise signs and symptoms of abuse and are made fully aware of the procedures for reporting and recording it.
- 8.2. Are encouraged to be vigilant to recognise signs of abuse (bruising, withdrawn behaviour, cries for help)
- 8.3 Staff members working with students are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a student, staff members should always act in the interests of the student.

9. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

Sometimes a member of staff may have suspicions that a student is being abused or is at risk of significant harm. A student may also disclose to a member of staff that he/she is being abused. In these circumstances the procedure outlined below should be followed.

- 9.1. If a member of staff has significant concern about a student, but does not believe that they are being abused or are at risk of immediate significant harm, she/he should:
 - Talk to the student about the concerns.
 - Speak to the student's Head of Hall who will discuss the issues with the Designated Member of Staff. They may choose to speak directly to the Designated Member of Staff.
- 9.2. If a member of staff has a significant concern about a student and believes they are being abused, then this must be reported to the Designated Member of Staff immediately following the procedure in 9.3.
- 9.3. If a member of staff receives a disclosure of abuse from a student, questions to that student must be kept to the absolute minimum necessary to understand what is being alleged. Leading questions must be avoided.
- 9.4. A full record of any conversations must be written down immediately after any conversation with the student and must include –
 - The name of the student
 - The date and time of disclosure
 - Location where the abuse took place and date and time
 - The name/names of other persons present
 - A description of injuries observed
 - The nature of the alleged abuse
 - The exact words spoken by the student
- 9.5. Promises of confidentiality must not be given but a student should be reassured that we as a college want to help them, and to do so "we need to know".
- 9.6. All complaints, allegations or suspicions must be taken seriously.
- 9.7. Staff must not investigate these allegations or concerns.

- 9.8. Some students with learning difficulties or disabilities may need additional support at any interview. This may take the form of the student's teacher/tutor/head of hall being present at interview to act as a facilitator or in an advocacy role. It should never be assumed that a student with learning difficulties or disabilities is not capable of providing credible evidence.
- 9.9. The Designated member of Staff should refer the matter to the relevant Social Services Department whenever abuse has been reported or whenever it is genuinely believed that abuse has taken place. A written record of the date and time of the report should be made and the name and position of the person to whom the report was made. A copy of this must be kept on file.
- 9.10. Where a student who is not a child under the Act is identified as being at risk the Designated Person will make a decision on whether there is a need to involve outside agencies such as social care or the Police. Outside agencies should only be involved with the agreement of the alleged victim unless disclosure is necessary in the over-riding public interest (e.g. to protect others from serious harm). In the case of students with learning difficulties, advice will be sought from the appropriate persons/agencies which could include the Head of Pathways to Independence Course, Case Worker or Social Workers.
- 9.11. The Designated Member of Staff must notify the Principal as soon as practicable and in any event within 24 hours of disclosure or suspicion being raised.

10. 14 – 16 year old pupils

- 10.1. Where an allegation is made regarding a 14 – 16 year old pupils, members of staff should follow the same procedures as outlined above. The Designated Member of Staff will liaise with the Designated Member of Staff from the learner's school, ensuring that the learner is informed of this process.

11. 16-19 year olds

- 11.1** The college is aware that students who are categorised as children (under 18) will be working in class alongside students who are categorised as adults in safeguarding terms (students who are 18 and over).
- 11.2** In order to be proportionately responsive to the risk this may present, staff will be vigilant at all times and be mindful that children are working alongside adults.

12. Work Placements

- 12.1. Employers and training organisations will be asked to cooperate with the College in putting in place and subscribing to appropriate safeguards.
- 12.2 Staff arranging placements will have had training in child protection.
- 12.3 Vetting and DBS checking any person whose normal duties will include regular caring for, training, looking after or supervising a child in the workplace where that person has been specifically designated to have responsibility for such activities.

13. Student absence from college to Safeguarding an individual(s)

13.1 It may be necessary in some instances for a student(s) to have a period of absence from college as a result of safeguarding concerns.

13.2 Student(s) may need to be absent dependent upon the risk (internal or external) to the individual as a result of attending college. Loreto would seek to work co-operatively with any external agencies e.g. Children's Safeguarding Boards, Police etc to ensure all measures were taken to safeguard the student.

13.3 In some cases it may be necessary for a student(s) to have a period of absence from college if it felt the student(s) poses a safeguarding risk to other college students or staff. In such cases the Designated Member of staff would seek to thoroughly investigate any risk, working with appropriate internal staff and external agencies/professionals.

13.4 In 13.3 the Designated Member of staff would seek to balance the needs of the individual(s) with the safeguarding responsibilities for the college population as a whole.

14. Allegations about a Member of Staff (This section refers to both employed staff and volunteers).

14.1 This aspect of the policy relates to managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children/students in their present position, or in any capacity.

14.2 Loreto has a duty of care towards its employees and will always seek to provide effective support for anyone facing an allegation and minimize the stress inherent in the allegations process.

14.3 Any allegation of abuse made against a teacher or other member of staff or volunteer in college will be dealt with quickly and in a fair and consistent way, providing effective protection for the child/student, whilst at the same time supporting the person who is the subject of the allegation.

14.4 In all cases common sense and judgement will be used when dealing with allegations. Consideration will be made as to whether the allegation meets the following criteria.

Has the person

- Behaved in a way that has or may have harmed a child/student.
- Possibly committed a criminal offence against or related to a child/student.
- Behaved towards a child/student that indicated that he or she would pose a risk of harm if they work regularly or closely with children.

14.5 Any suspicion, allegation or actual abuse of a student by a member of staff must be reported to the Designated Member of Staff as soon as possible and in any case within 2 hours of the initial concern arising. If the Designated Member of Staff cannot be contacted a member of the senior management team must be contacted. On being notified of any such matter the Designated Member of Staff shall:

- Take such steps, as s/he considers necessary to ensure the safety of the student in question and any other person who is considered at risk.
- Immediately notify the Principal or in his/her absence another Assistant Principal.

14.6 The following definitions should be used when determining the outcome of allegation investigation:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

14.7 After being informed of an allegation against a member of staff, the Principal or her representative will consult Manchester Safeguarding Children's Board (LADO) within one working day.

14.8 The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the Principal or her representative, and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom. The Principal or her representative should then consider with the LADO what action should follow both in respect of the individual and those who made the initial allegation.

14.9 The person who reported the original concern will complete a report of the matter as set out in section 9.

14.10 The Principal or her representative should inform the accused person about the allegation as soon as possible after consulting the LADO.

14.11 Once the outcome is determined the College will take a view on how to proceed in line with its disciplinary policies and the DfE 'Keeping Children Safe in Education' guidance – Reference 111.

14.12 If a case is felt an allegation does appear to meet the criteria outlined above the Principal, or representative, working with the LADO, will consult with the police and children's social care services as appropriate.

14.13 The Principal will, following College procedures, inform the member of staff that s/he may be suspended on full pay pending an investigation. The length of any suspension will be in line with College policies and will be as short as is possible while ensuring the safety of the child/student. N.B. Suspension should not necessarily be an automatic response to an allegation and all allegations should be dealt with quickly, fairly and consistently. Furthermore, suspension is a neutral, not a disciplinary act and shall be on full pay.

- 14.14 Throughout the process, the Personnel department will maintain contact with the member of staff and offer appropriate support. Anyone suspended will be provided with a named contact person.
- 14.15 Parents/Carers of the child/student involved will be told about the allegation as soon as possible if they do not already know of it, once relevant external agencies have been contacted as appropriate e.g. the Police. Throughout the process, the College will make every effort to maintain confidentiality and guard against unwanted publicity.
- 14.16 The designated person will take advice from the LADO, Police and Children's Services with regard to: who needs to know, what information is to be shared, how to manage speculation and gossip, what information, if any, can be passed onto the wider community and how to manage press interest should it arise.
- 14.17 If the Designated Member of Staff is the subject of the allegation or complaint, the matter must be reported directly to the Principal or Acting Principal.
- 14.18 If the Principal is subject to any such allegation or complaint, the Designated Member of Staff will contact the Chair of Governors and Designated Governors.

15. Written Records

- 15.1. The Nominated Member of Staff shall retain a copy of:
- The report.
 - Any notes, memoranda or other correspondence dealing with the matter.
 - Any other relevant materials.
- 15.2. Copies of reports, notes etc. should be kept securely locked at all times and kept for a minimum period of seven years.
- 15.3. Copies of reports regarding allegations made against staff shall be kept securely sealed by the Principal for a time directed by the Manchester Safeguarding Children's Board or ISA.

Appendix A

A.1.The difference between a forced marriage and an arranged marriage.

A.2.The tradition of arranged marriages has operated successfully within many communities and many countries for a very long time. A clear distinction must be made between a forced and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether or not to accept the arrangement remains with the young people. In forced marriage, one or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure.

Possible Indicators of Forced Marriages

- Truancy
- Decline in performance or punctuality
- Low motivation at school
- Poor exam results
- Being withdrawn from school by those with parental responsibility
- Not allowed to attend extracurricular activities

A.3. What to do if you are concerned that a student is being forced to marry.

- Immediately contact The Designated Member of Staff.

A.4. The Designated Member of Staff must report this to the appropriate social services agencies as in section 9.

Appendix B

B. 1 Pathways and Disabled students

B.2 The college recognizes the increased vulnerability, in safeguarding terms, of pathways and disabled students.

B.3 These students may not be able to fully express the abuse that they have suffered/be suffering or be placed in more vulnerable situations on a more regular basis than mainstream students.

B.4 Staff are aware of the need to be extra vigilant when working with such students in order to provide robust safeguarding practices for them.

B.5 Staff are also aware that in some cases students on the pathways course do not always have the capacity to take safe decisions for themselves and so may require additional support/ guidance/ intervention from staff.

B.6 If staff have safeguarding concerns surrounding a student's capacity to make safe choices they should follow the procedures outlined in 9 above.

Appendix C

C.1 Safeguarding Vulnerable Adults

In addition to the general safeguarding procedures Loreto College recognises that it has an important role to play in helping to promote and safeguard the welfare of vulnerable adults and to help protect them from abuse.

C.2 Loreto College ensures that:

There are effective safeguarding policies and procedures in place that are made available to learner's, parents and care providers and the general public.

- The College operates safe recruitment procedures and appropriate checks are carried out on staff and volunteers who work with vulnerable adults.
- There are Designated Staff including a Lead Designated Manager who takes responsibility for dealing with safeguarding issues.
- There is a nominated Governor for Safeguarding.

C.3 Responding to Allegations of Abuse and Follow up Procedures

College staff who have regular contact with learners are well placed to observe significant changes in behavior, issues of neglect or outward signs of abuse. Vulnerable adults may choose to share their concerns with staff they feel they can trust and with whom they are comfortable. Staff need to know how to respond sensitively to the concerns and who to approach for advice and guidance. Whilst college staff are not responsible for investigating abuse it is essential that any suspicions of significant harm or allegations of abuse are acted on and treated seriously.

Evidence suggests that some learners with learning difficulties and disabilities are especially vulnerable to abuse, e.g. those with communication difficulties. Those working with vulnerable adults with special educational needs and/or disabilities often provide close support, including intimate care, and may encounter indicators of possible abuse. Whilst extra care may be needed to ensure that the signs of abuse/neglect are interpreted correctly, any suspicions should be reported in exactly the same way as for any other learner.

C.4 Definitions – Vulnerable Adults

A vulnerable adult may be a person who:

- is frail due to ill health, physical disability or cognitive impairment;
- has a learning disability, has a physical disability and/or a sensory impairment;
- has mental health needs including dementia or a personality disorder;
- has a long-term illness/condition;
- is unable to demonstrate the capacity to make relevant decision and is in need of care and support.

A person's vulnerability is determined by a range of interconnected factors including those associated with their personal characteristics, their situation, environment and social circumstances. Some of these are described in the table below.

C.5 Factors determining vulnerability

Personal characteristics of the adult at risk that increase vulnerability may include:

- Not having mental capacity to make decisions about their own safety including fluctuating mental capacity associated with mental illness and other conditions;
- Communication difficulties;
- Physical dependency - being
- Dependent on others for personal care and activities of daily life;

Social/situational factors that increase the risk of abuse may include:

- Being cared for in a care setting, that is, more or less, dependent on others;
- Not getting the right amount or the right kind of care that they need;
- Isolation and social exclusion;
- Lack of access to information and support;