

11. TAKING CARE OF ALL - POLICY & GUIDELINES

Christ calls us to love, care for and value everyone.

This gospel imperative of loving our neighbour as ourselves leads us to respect all as individuals, treating each with dignity and empowering them to reach their full potential.

The Presbyterian Church in Ireland seeks to reflect Christ's compassion for everyone and to safeguard all those who come into contact with the mission and ministries of the Church, by preventing harm and protecting those at risk.

11.1 INTRODUCTION

The Presbyterian Church in Ireland has 539 congregations with around 250,000 people attending worship and a range of other activities. Our Child Protection Guidelines were adopted by the General Assembly in 1996 and were further developed on the launch of Taking Care and establishment of a Taking Care Office in 2006. Every congregation has a named designated person for child protection and adheres to the stated guidelines as laid down by the General Assembly.

This Policy and Guidelines, together with our well-established Taking Care Programme, will ensure that we reduce the risk of harm, abuse or exploitation for all within the Church. The Presbyterian Church has a zero-tolerance approach to all forms of harm, abuse and exploitation.

As a Church we have a duty to protect all who are members or participate in the life and work of our church community. Harm, abuse or exploitation can happen anywhere, even in churches. Safeguarding is everyone's business and should be an integral part of congregational life and monitored by Kirk Sessions. It should not be seen as another burdensome policy, but as the living out of the Gospel imperative to love and care for one another.

The Pastoral Care of members, church based activities and events will be the main context of many of our concerns. Doing nothing is not an option; better to share a concern than run the risk of a serious event going unreported.

This response will involve us as a Church discussing our concerns and, when necessary, reporting them to the appropriate person and cooperating with Statutory Bodies, whilst ensuring that the appropriate support is afforded to all parties concerned.

Our churches have a significant presence in our communities. Individuals, families and groups participate in activities every week. They have a right to feel safe and secure and when systems fail we have a duty to act immediately.

"As a denomination, it is vital that we ensure that all of our members and visitors are protected from abuse, exploitation or neglect and the risk of harm. Safeguarding adults is complex and challenging and it is vital that we work in partnership with other agencies to protect all."

The term "safeguarding" is used in its widest sense; that is, to encompass both activity which prevents harm from occurring in the first place and activity which protects adults at risk where harm has occurred or is likely to occur without intervention.

These guidelines are for anyone within the Presbyterian Church in Ireland who is working with adults at risk, whether they are in a paid position or are a volunteer.

Examples:

- :: Ministers
- **::** Elders
- :: Deaconesses
- :: Volunteers
- :: Staff Members
- :: Pastoral Care Workers
- :: Pastoral Team Members

Kirk Sessions, Presbyteries, General Assembly Councils and the General Assembly are responsible for ensuring the implementation of, and compliance with these quidelines.

The guidelines aim to:

- :: Raise awareness of harm to adults at risk.
- :: Define what harm is and how it might be recognised.
- Explain what process should be followed within PCI if there is concern that an adult at risk might be experiencing harm.
- ** Set out how the Presbyterian Church in Ireland aims to prevent harm taking place and protect those who are at risk from harm.

Key messages

Safeguarding is for all – As a Church we are now familiar with the whole concept of Child Protection. We are to apply those good sound principles in the area of Adults. Adult Safeguarding is much more than the care of Older People and those with Disabilities. These Guidelines will assist us to keep safe all those over the age of 18 who are at risk of harm.

Taking Care of All – demands that we strive to prevent harm and protect those at risk.

We have a duty to:

- :: Protect, as well as a duty to care;
- :: Adopt a zero tolerance approach to all forms of harm/abuse/neglect/ exploitation;
- :: Deliver training;
- :: Report concerns immediately;
- :: Understand that a delay may place individuals at further risk;
- :: Co-operate and be in partnership with other agencies;
- :: Take our responsibilities seriously as stated within the policy;
- :: Appropriately share information that may assist in the protection of others and in the promotion of good practice.

Who is responsible for ensuring implementation of and compliance with Taking Care of All?

- :: General Assembly
- :: Presbytery
- :: General Assembly Councils
- :: Kirk Sessions

These guidelines move away from the concept of "vulnerability" in adulthood and towards establishing the concept of "risk of harm" in adulthood. In doing so, the guidelines place the responsibility for any harm caused with those who perpetrate it and not with the person who has been harmed.

Harm resulting from abuse, exploitation or neglect violates the basic human rights of a person to be treated with respect and dignity, to have control over their life and property, and to live a life free from fear. Harm can have a devastating and long lasting impact on victims, their families and carers. It is the impact of an act, or omission of actions, on the individual that determines whether harm has occurred.

Any action which causes harm may constitute a criminal offence and/or professional misconduct on the part of an employee.

Adult safeguarding is based on fundamental human rights and on respecting the rights of adults as individuals, treating all adults with dignity and respecting their right to choose.

It involves empowering and enabling all adults, including those at risk of harm, to manage their own health and well-being and to keep them safe. It extends to intervening to protect where harm has occurred or is likely to occur and promoting access to justice. All adults at risk should be central to any actions and decisions affecting their lives.

Preventative Safeguarding includes a range of actions and measures such as practical help, care, support and interventions designed to promote the safety, well-being and rights of adults which reduce the likelihood of, or opportunities for, harm to occur. Effective preventative safeguarding requires partnership working, that is, individuals, professionals and agencies working together to recognise the potential for, and to prevent, harm. Prevention is therefore the responsibility of a wide range of agencies, organisations and groups; indeed it is the responsibility and concern of us

all as good citizens and neighbours, including those who may be at risk of harm, to be alert to the individual's needs and any risks of harm to which they may be exposed. Prevention will strive towards early intervention to provide additional supports at all levels for adults whose personal characteristics or life circumstances may increase their exposure to harm.

Protective Safeguarding will be targeted at adults who are in need of protection, that is, when harm from abuse, exploitation or neglect is suspected, has occurred, or is likely to occur. The protection service is led by HSC Trusts and the PSNI. The input of other individuals, disciplines or agencies may be required, either in the course of an investigation of an allegation of harm or in the formulation and delivery of a care and protection plan.

Effective preventative safeguarding requires partnership working and is the responsibility of everyone – individual / staff / volunteer / Minister / Deaconess / Pastoral Care Worker / Elder and all teams and organisations that come into contact with adults.

11.2 DEFINITIONS

It is important to understand what we mean when we talk about adult safeguarding.

Northern Ireland

In Northern Ireland an adult at risk is defined in the government policy.

Adult Safeguarding – Prevention and Protection in Partnership defines an **adult at risk of harm** as a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their personal characteristics which may include, but are not limited to, age, disability, special educational needs, illness, mental or physical frailty or impairment of, or disturbance in, the functioning of the mind or brain. Life circumstances may include, but are not limited to, isolation, socioeconomic factors and environmental living conditions.

An **adult in need of protection** is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their:

- :: Personal characteristics
- :: Life circumstances
- :: Who are unable to protect their own wellbeing, property, assets, rights or other interests.

Previous safeguarding policies focused on protection and the term "vulnerable adult". This policy moves away from the concept of "vulnerability" and towards establishing the concept of "risk of harm" in adulthood. It places the responsibility of harm caused with those who perpetrate it.

Republic of Ireland

In the **Republic of Ireland** the National Policy Safeguarding Vulnerable Persons at Risk of Abuse (December 2014) states that a **vulnerable person** is "an adult who may be restricted in capacity to guard him / her against harm, exploitation or to report such harm or exploitation". Restriction of capacity may arise as a result of physical or intellectual impairment. Vulnerability to abuse is influenced by both content and individual circumstances. In other words some can be vulnerable to abuse at some stage in their lives, depending on their age, disability or need for support.

What do we mean by "abuse"?

Abuse is 'a single or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust, which causes harm or distress to another individual or violates their human or civil rights'. Abuse is the misuse of power and control that one person has over another. It can involve direct and indirect contact and can include online abuse

What do we mean by "harm"?

Harm is the impact on the victim of abuse, exploitation or neglect. It is the result of any action whether by commission or omission, deliberate, or as the result of a lack of knowledge or awareness which may result in the impairment of physical, intellectual, emotional, or mental health or well-being.

Harm resulting from abuse, exploitation or neglect violates the basic human rights of a person to be treated with respect and dignity, to have control over their life and property, and to live a life free from fear. Harm can have a devastating and long lasting impact on victims, their families and carers. It is the impact of an act, or omission of actions, on the individual that determines whether harm has occurred.

Any action which causes harm may constitute a criminal offence and/or professional misconduct on the part of an employee.

What are the main forms of abuse?

Abuse can take many forms. The most commonly cited forms of abuse are:

Physical Abuse

- :: Physical abuse is the use of physical force or mistreatment of one person by another which may or may not result in actual physical injury.
- ** This may include hitting, pushing, rough handling, exposure to heat or cold, force feeding, improper administration of medication, denial of treatment, misuse or illegal use of restraint and deprivation of liberty.

Sexual Violence and Abuse

- :: Sexual abuse is any behaviour perceived to be of a sexual nature which is unwanted or takes place without consent or understanding.
- "Sexual violence and abuse can take many forms and may include non-contact sexual activities, such as indecent exposure, stalking, grooming, being made to look at or be involved in the production of sexually abusive material, or being made to watch sexual activities. It may involve physical contact, including but not limited to non-consensual penetrative sexual activities or non-penetrative sexual activities, such as intentional touching (known as groping).
- :: Sexual violence can be found across all sections of society, irrelevant of gender, age, ability, religion, race, ethnicity, personal circumstances, financial background or sexual orientation.

Psychological/Emotional Abuse

- :: Psychological / emotional abuse is behaviour that is psychologically harmful or inflicts mental distress by threat, humiliation or other verbal/non-verbal conduct.
- :: This may include threats, humiliation or ridicule, provoking fear of violence, shouting, yelling and swearing, blaming, controlling, intimidation and coercion.

Financial Abuse

- :: Financial abuse is actual or attempted theft, fraud or burglary. It is the misappropriation or misuse of money, property, benefits, material goods or other asset transactions which the person did not or could not consent to, or which were invalidated by intimidation, coercion or deception.
- :: This may include exploitation, embezzlement, withholding pension or benefits or pressure exerted around wills, property or inheritance.

Institutional Abuse

Institutional abuse is the mistreatment or neglect of an adult by a regime or individuals in settings which adults who may be at risk reside in or use. This can occur in any organisation, within and outside the HSC sector. Institutional abuse may occur when the routines, systems and regimes result in poor standards of care, poor practice and behaviours, inflexible regimes and rigid routines which violate the dignity and human rights of the adults and place them at risk of harm. Institutional abuse may occur within a culture that denies, restricts or curtails privacy, dignity, choice and independence. It involves the collective failure of a service provider or an organisation to provide safe and appropriate services, and includes a failure to ensure that the necessary preventative and/or protective measures are in place.

Neglect

- **Occurs when a person deliberately withholds, or fails to provide, appropriate and adequate care and support which is required by another adult. It may be through a lack of knowledge or awareness, or through a failure to take reasonable action given the information and facts available to them at the time.
- It may include physical neglect to the extent that health or well-being is impaired, administering too much or too little medication, failure to provide access to appropriate health or social care, withholding the necessities of life, such as adequate nutrition, heating or clothing, or failure to intervene in situations that are dangerous to the person concerned or to others particularly when the person lacks the capacity to assess risk.

Exploitation

- :: Is the deliberate maltreatment, manipulation or abuse of power and control over another person; to take advantage of another person or situation usually, but not always, for personal gain from using them as a commodity?
- :: It may manifest itself in many forms including slavery, servitude, forced or compulsory labour, domestic violence and abuse, sexual violence and abuse, or human trafficking.

This list of types of harmful conduct is not exhaustive or listed here in any order of priority. There are other indicators which should not be ignored. It is also possible that if a person is being harmed in one way, he/ she may very well be experiencing harm in other ways.



Are there any other related definitions we need to be aware of?

Related Definitions

There are related definitions which interface with Adult Safeguarding, each of which have their own associated adult protection processes in place.

It is important that congregations are aware of the following:

Domestic Violence and Abuse

- Domestic violence and abuse is threatening behaviour, violence or abuse (psychological, physical, verbal, sexual, financial or emotional) inflicted on one person by another where they are or have been intimate partners or family members, irrespective of gender or sexual orientation.
- ** Domestic violence and abuse is essentially a pattern of behaviour which is characterised by the exercise of control and the misuse of power by one person over another. It is usually frequent and persistent.
- **It can include violence by a son, daughter, mother, father, husband, wife, life partner or any other person who has a close relationship with the victim. It occurs right across society, regardless of age, gender, race, ethnic or religious group, sexual orientation, wealth, disability or geography.

Human Trafficking

- :: Human trafficking involves the acquisition and movement of people by improper means, such as force, threat or deception, for the purposes of exploiting them.
- ** It can take many forms, such as domestic servitude, forced criminality, forced labour, sexual exploitation and organ harvesting.
- :: Victims of human trafficking can come from all walks of life; they can be male or female, children or adults, and they may come from migrant or indigenous communities.

Hate Crime

- ** Hate crime is any incident which constitutes a criminal offence perceived by the victim or any other person as being motivated by prejudice, discrimination or hate towards a person's actual or perceived race, religious belief, sexual orientation, disability, political opinion or gender identity.
- :: Victims of domestic violence and abuse, sexual violence and abuse, human trafficking and hate crime are regarded as adults in need of protection.

Adult Safeguarding Champion

Prevention and Protection in Partnership requires us to have an identified Adult Safeguarding Champion in place.

The role of the Safeguarding Champion is to:

- : Provide information and support for congregations on adult safeguarding within the organisation.
- Ensure that congregations disseminate the policy and guidelines and support implementation.
- :: Design and deliver training.
- : Provide advice and support to volunteers who have concerns about the signs of harm, and ensure that it is reported.
- :: Establish contact with the Taking Care Champion.
- Establish contact with the relevant Health and Social Care Trust in respect of any safeguarding concerns.

Recognising, Responding and Recording Adult Safeguarding Concerns

Ministers, Pastoral Care Workers or volunteers who are concerned about someone who may be experiencing harm or abuse must report promptly.

There are a variety of ways that you could be alerted that an adult is experiencing harm:

- :: They may disclose to you as a Minister, Elder, Pastoral Worker or Friend.
- **::** Someone else may tell you of their concerns or something that causes you concern, following a visit or conversation.
- :: They may show some signs of physical injury for which there does not appear to be a satisfactory or credible explanation.
- :: Their demeanour/behaviour may lead you to suspect abuse or neglect.
- :: The behaviour of a person close to them makes you feel uncomfortable (this may include other members of the congregation or organisation, a volunteer, peer or family member) or through general good neighbourliness and citizenship.

Being alert to potential abuse plays a major role in ensuring that adults are safeguarded and it is important that all concerns about possible abuse are taken seriously and appropriate action is taken.

- ** Responding: Staff / Volunteers who find themselves dealing with an abusive setting may well have different reactions. Some may feel anger towards the abuser; others may block it out and may even deny it has happened, while some may become withdrawn and difficult to communicate with. Therefore it is vital that staff/volunteers are supported.
- **Reporting: Staff or volunteers who are concerned about someone who may be experiencing harm or abuse must report promptly these to the Minister of the congregation in which they are working (or convener of vacancy if applicable). The Presbytery Adult Safeguarding Champion should then be contacted. If they are concerned that it is a safeguarding issue then the PCI Adult Safeguarding Champion should be contacted who will make a report to the police or social services if appropriate.



If at any time an adult at risk is in danger, Social Services or Police should be contacted without delay.



24 hour Helpline +44 (0)28 9041 7235

Recording: If a staff member/volunteer is concerned that an adult is experiencing harm, then they should keep a written record of their observations, conversations and/or action points. Any written record (hard copy or electronic) must be kept confidential.

Support for Staff

Staff/Volunteers who find themselves dealing with an abusive situation may react in different ways. Some may feel anger towards the abuser; others may block it out and may even deny it has happened; while some may become withdrawn and difficult to communicate with. Therefore it is vital that staff/volunteers are supported.

Confidentiality

Staff/volunteers must not breach confidentiality by discussing safeguarding cases with others inappropriately.

11.3 ADULT PROTECTION SERVICES

Northern Ireland

Health and Social Care Trusts and the PSNI are the lead agencies with responsibility for adult protection.

- Each HSC Trust will have an Adult Protection Gateway Service which will receive adult protection referrals.
- :: HSC Trusts will be the lead agency in terms of the co-ordination of joint Adult Protection responses.
- ** Within each HSC Trust, responsibility for Adult Protection rests with the Executive Director of Social Work, and the lead profession within HSC Trusts is social work.

The PSNI will be the lead criminal investigation agency and a report should be made to the PSNI where a crime is alleged or suspected.

- :: A joint Protocol will guide interagency referral, consultation and information exchange and working arrangements and will provide clarity in respect of the roles of the PSNI and HSC Trusts in the delivery of the adult protection response.
- ** The Joint Protocol will outline when and how other agencies will be engaged for the purpose of an adult protection investigation and protection planning.

Republic of Ireland

Health Service Executive

A Safeguarding and Protection Team (Vulnerable Persons) will be established in each Community Healthcare Organisation (CHO). The Safeguarding and Protection Team will work collaboratively with services and professionals in promoting the welfare of vulnerable persons and act as a resource to personnel and services having concerns regarding vulnerable persons.

An Garda Síochána

An Garda Síochána must be informed if it is suspected that the concern or complaint of abuse might be criminal in nature; this may become apparent at the time of disclosure or following the outcome of the preliminary assessment.

11.4 VETTING

Northern Ireland

Access NI

Roles which require an Enhanced Disclosure Check (against the barred lists):

- :: Providing personal care, e.g. washing, toileting.
- :: Assistance with general household affairs, e.g. paying bills or shopping on their hehalf
- :: Transporting to a Health Care Appointment, e.g. taking an adult to and from their GP appointment on behalf of the church. Please note that if a friend takes their neighbour to a hospital appointment this would be a personal arrangement and therefore they would not need to be vetted.

Roles which require an Enhanced Disclosure Check (NOT barred lists):

- :: Visiting adults at risk regularly, ie every week in their own home.
- :: Driving a church minibus on a regular basis where the majority of those on the bus are considered to be at risk.
- :: Taking a group on an overnight stay where the majority of those on the holiday are considered to be at risk.

Roles which DO NOT require an Access NI check:

- :: Elders visiting their district.
- :: Those delivering a hot meal to an individual (note the difference in delivering a meal and feeding the adult).
- :: A friend or neighbour taking someone to hospital for an outpatient appointment.
- :: Volunteers at a lunch club for older people.

Republic of Ireland

Garda Vetting

According to The National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 & 2016, "Any work or activity which is carried out by a person, a necessary and regular part of which consists mainly of the person having access to, or contact with, children or vulnerable adults" needs to be vetted. This is a legal requirement.

Training

It is recommended that all staff/volunteers within the Presbyterian Church in Ireland who are working with adults at risk whether they are in a paid position or are a volunteer should attend adult safeguarding training on a regular basis. The training will be relevant to their role in a church based setting working with adults.

Training seminars will be organised by the Council for Social Witness. This training will be based on the Volunteer Now Keeping Adults Safe programme and facilitated by those trained to deliver the programme.

Training seminars will also be provided for the Presbytery Adult Safeguarding Champions.

Annual Report

The Adult Safeguarding Champion must compile an annual Adult Safeguarding Position Report. This will include the number of referrals made to HSC Trusts and the number of adult safeguarding discussions where the decision taken was to not refer to HSC trust. For this reason it is important that Presbytery Adult Safeguarding Champions maintain contact with the Adult Safeguarding Champion for PCI.

11.5 UNDERPINNING PRINCIPLES

All Adult Safeguarding activity must be guided by five underpinning principles:

A Rights-Based Approach: To promote and respect an adult's right to be safe and secure; to freedom from harm and coercion; to equality of treatment; to the protection of the law; to privacy; to confidentiality; and freedom from discrimination.

An Empowering Approach: To empower adults to make informed choices about their lives, to maximise their opportunities to participate in wider society, to keep themselves safe and free from harm and enabled to manage their own decisions in respect of exposure to risk.

Person-centred Approach: To promote and facilitate full participation of adults in all decisions affecting their lives taking full account of their views, wishes and feelings and, where appropriate, the views of others who have an interest in his or her safety and well-being.

Consent-driven Approach: To make a presumption that the adult has the ability to give or withhold consent; to make informed choices; to help inform choice through the provision of information, and the identification of options and alternatives; to have particular regard to the needs of individuals who require support with communication, advocacy or who lack the capacity to consent; and intervening in the life of an adult against his or her wishes only in particular circumstances, for very specific purposes and always in accordance with the law.

Collaborative Approach: To acknowledge that adult safeguarding will be most effective when it has the full support of the wider public and of safeguarding partners across the statutory, voluntary, community, independent and faith sectors working together and is delivered in a way where roles, responsibilities and lines of accountability are clearly defined and understood. Working in partnership and a person-centred approach will work hand-in-hand.

Appendix 1

SCENARIOS

1.1 A Pastoral Visitor is concerned that an 80-year old member of the congregation has little food in the house and the house is always cold. They are aware that the person should be comfortably off and that there should be no money problems.

This could be a case of financial abuse, by a carer or family member or could be a sign of the early onset of dementia. This should be discussed with a responsible family member or the Adult Safeguarding Team.

1.2 A minister is made aware of an incident of domestic abuse within the congregation. A 45-year old women has become withdrawn, has stopped attending worship and has had unexplained injuries to her face.

Steps must be taken to protect this individual and encourage her to seek help. The offer should also be made for the minister to report the incident to the Safeguarding Team. Regular visiting by the minister or other member of the congregation should be arranged.

1.3 A member of the Bowling Club shares with another member that he is coming into a substantial amount of money, but he needs to pay out thousands to enable him to claim.

This person has been subjected to a SCAM and it should be reported immediately. It is highly likely that he has already lost substantial sums of money.

1.4 A family become concerned that their retired parents are being frequently visited by a member of the church. They are always talking openly about their problems, especially financial difficulties. The couple quickly change the subject, when they are asked if the individual has borrowed money.

This could be a genuine case of a couple offering advice and assistance to a member of their church family. Equally it could be a case of the person taking advantage. It must be discussed with the Safeguarding Champion.

1.5 A member of a congregation, who has a learning disability, is refused membership of the church choir without a satisfactory explanation. On looking into the matter the minister is told that other members of the choir are uncomfortable about the individual joining, although they acknowledge that the individual is a good singer.

Refusing to let the individual join the choir is, strictly speaking, not a safeguarding issue, but it is clear discrimination and an undesirable practice. The minister and kirk session must intervene

Appendix 2

RESOURCES

Northern Ireland

NIASP (Northern Ireland Adult Safeguarding Partnership) web-site: www.hscboard.hscni.net/niasp

Volunteer Now www.volunteernow.co.uk

Republic of Ireland

National Advocacy Service www.inclusionireland.ie/content/services/965/national-advocacy-service

Health Service Executive www.hse.ie/eng/

Appendix 3

REFERENCES

Safeguarding Vulnerable Persons at Risk of Abuse (National Policy and Procedures) Health Service Executive December 2014

'Adult Safeguarding Prevention and Protection in Partnerships', DHSSPS/DOJ July 2015

Safeguarding Vulnerable Adults – "A Shared Response" Volunteer Now November 2010

NISCC Codes of Practice

RQIA Procedure for Responding to allegations, suspicions or incidents of abuse of vulnerable adults in regulated services 2007

Adult Safeguarding Operational Procedures – Adults at Risk of Harm and Adults in Need of Protection (NIASP 2016)

041 6850 300

Appendix 4

CONTACT DETAILS

Northern Ireland

HSE Information Line Mon-Sat 8am-8pm

Adult Safeguarding Champion for PCI Taking Care Office Taking Care Helpline	+44 (28) 9041 7235 +44 (28) 9041 7290 takingcare@presbyterianireland.org +44 (28) 9041 7235
Health and Social Care Trust Adult Safeguarding Northern Trust Western Trust South Eastern Trust Belfast Trust Southern Trust Emergency Social Work (Evenings or weekends)	028 9441 3659 028 7161 1366 028 9250 1227 028 9504 1744 028 3756 4423 028 9504 9999
Health and Social Care Trust Child Protection Northern Trust Western Trust South Eastern Trust Belfast Trust Southern Trust	0300 1234 333 028 7131 4090 0300 1000 300 028 9050 7000 0800 7837 745
Police Service of Northern Ireland In an emergency call To report your concerns call Republic of Ireland	999 101
Garda Health Service Executive Confidential Recipient LoCall	999 or 112 1890 100 014