



# SAFEGUARDING ADULTS AT RISK POLICY

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**This Document compliments our Safeguarding children and young people policy and offers specific information and guidance relating to adults at risk.**



**The guidance given in the policy and procedures is based on the following principles:**

- All adults, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.
- We will seek to ensure that our sport and any other recreational activities are inclusive and make reasonable adjustments for any ability, disability or impairment, we will also commit to continuous development, monitoring and review.
- The rights, dignity and worth of all adults will always be respected.
- We recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, in particular those adults with care and support needs
- We all have a shared responsibility to ensure the safety and well-being of all adults and will act appropriately and report concerns whether these concerns arise within the club for example inappropriate behaviour of a coach, or in the wider community.
- All allegations will be taken seriously and responded to quickly in line with the Club allegations against staff policy.

# WHAT IS AN ADULT AT RISK?

We recognise that at any point in an adult's life we may experience situations that make us vulnerable. This policy is for any adult that may at any point experience a vulnerability and we will do our best to recognise peoples struggles and offer support and help.

## Our Commitment

We follow the 6 core principles set out by The Care Act that underpin the safeguarding of adults.

### Empowerment

People are supported and encouraged to make their own decisions and informed consent.

"I am asked what I want as the outcomes from the safeguarding process, and this directly inform what happens."

### Prevention

It is better to take action before harm occurs.

"I receive clear and simple information about what abuse is. I know how to recognise the signs, and I know what I can do to seek help."

### Proportionality

The least intrusive response appropriate to the risk presented.

"I am sure that the professionals will work in my interest, and they will only get involved as much as is necessary."

### Protection

Support and representation for those in greatest need.

"I get help and support to report abuse and neglect. I get help so that I can take part in the safeguarding process to the extent to which I want."

### Partnership

Services offer local solutions through working closely with their communities.

Communities have a part to play in preventing, detecting, and reporting neglect and abuse.

"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me."

### Accountability

Accountability and transparency in delivering safeguarding.

"I understand the role of everyone involved in my life and so do they."

# LEGISLATION

## **The Human Rights Act 1998**

Gives specific rights to every person living in the UK, including the right to life and freedom from torture or degrading treatment.

## **The Care Act 2014**

Makes it the duty of local authorities to make enquiries if a person is being abused or neglected, or is at risk of abuse or neglect in their area. They must also set up multi-agency safeguarding adult review boards to review cases when people die as a result of neglect or abuse and where it is suspected that agencies could have done more to safeguard them.

## **Mental Capacity Act - MCA 2005**

Aims to protect and empower individuals who are unable to make choices for themselves.

## **Equality Act 2010**

Protects people from discrimination and disadvantage due to their race, religion, sexual preference or any other protected characteristic.

## **The Data Protection Act 2018**

Regulates how organisations use personal data, providing protection against people's data being placed in the wrong hands which could make them more vulnerable to abuse. All agencies should provide training for all staff and volunteers who work with adults at risk to ensure that the policies, procedures and professional practices in place locally are in line with their responsibilities in the adult protection process.

# WHAT IS SAFEGUARDING?



**Safeguarding is a term we use to describe how we protect adults and children from abuse or neglect. Safeguarding is about protecting certain people who may be in vulnerable circumstances. These people may be at risk of abuse or neglect due to the actions (or lack of action) of another person.**

Safeguarding adults at risk includes:

- Protecting from abuse and maltreatment.
- Preventing harm to health or development.
- Ensuring vulnerable adults grow up with the provision of safe and effective care.
- Acting to ensure all adults with vulnerabilities, children and young people to have the best outcomes, rights, and we believe that children and young people should never experience abuse of any kind.

***Remember:***

**Safeguarding is everyone's business.**

If you are ever in doubt, you should always contact a member of the safeguarding team for support and guidance. It is always better to report a concern which later turns out to be unfounded than to not report a concern. Listen to your 'nagging voice'.

# MENTAL CAPACITY

**It is not the Club, employees, casual workers, agency staff, consultants, or volunteers to decide about whether any adult at risk may lack mental capacity in relation to the concern in question, but it is useful to have an understanding of the notion of capacity explained below.**

The starting assumption must always be that a person has the capacity to decide, unless it can be established that they lack capacity. The term 'lack of capacity' means a person who lacks ability to make a decision or take a particular action for themselves at the time when the decision or action needs to be taken. This reflects the fact that some people may be unable to make some decision for themselves but will have capacity to make other decisions. For example, they may be able to make small decisions about everyday matters such as what to wear or what to eat but lack capacity to make more complex decision about financial matters. This reflects that a person who lacks capacity to decide at a certain time may be able to make that decision later – this may be due to illness or accident. Decisions about mental capacity are made by medical professionals.

People also have the right to make unwise decisions! The important thing is that they understand the implications. If they understand the implications, consider how risks might be minimised.

## *Remember:*

You should not discriminate or make assumptions about someone's ability to make decisions, and you should not pre-empt a best-interests decision merely based on a person's age, appearance, condition, or behaviour.

Important – if you believe an adult is at risk and there is the possibility of children being involved then we would need to refer immediately to our safeguarding children and young people policy. For example – a woman we are working with discloses domestic abuse. We should support her and signpost her to appropriate agencies. If we believe there are children at home, then we also have a duty of care to those children even if they haven't witnessed abuse. Being exposed to domestic abuse in childhood is child abuse.

They may -

- hear the abuse from another room
- see someone they care about being injured and/or distressed
- find damage to their home environment like broken furniture
- be hurt from being caught up in or trying to stop the abuse
- may not getting the care and support they need from their parents or carers as a result of the abuse

If you believed this to be the case you would follow Wolves FC safeguarding procedures and speak to a designated safeguarding lead which may result in multi-agency referral into social services even if the adult, we consider at risk asks us not to. We have a responsibility and duty of care to children.

# ABUSE

## **What is Abuse?**

Abuse and neglect take many forms. Abuse can lead to a violation of someone's human and civil rights by another person or persons. Abuse can be physical, financial, verbal, or psychological. It can be the result of an act or a failure to act. It can happen when an adult at risk is persuaded into a financial or sexual exchange they have not consented to or can't consent to.

Abuse can occur in any relationship and may result in significant harm or exploitation. Some types of abuse are illegal, and in these cases adults who lack capacity are protected by law the same as everyone else. Abuse is a misuse of power and control that one person has over another. Where someone is dependent on another, there is the possibility of abuse or neglect unless enough safeguards are put in place.

## **Abuse can fall into the following categories:**

### **Physical**

This includes assault, hitting, slapping, pushing, giving the wrong (or no) medication, restraining someone, or only letting them do certain things at certain times.

### **Domestic**

This includes psychological, physical, sexual, financial, or emotional abuse. It also covers so-called 'honour' based violence.

### **Sexual**

This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, taking sexual photographs, making someone look at pornography or watch sexual acts, sexual assault, or sexual acts the adult didn't consent to or was pressured into consenting.

### **Psychological**

This includes emotional abuse, threats of harm or abandonment, depriving someone of contact with someone else, humiliation, blaming, controlling, intimidation, putting pressure on someone to do something, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or support networks.

### **Financial or material**

This includes theft, fraud, internet scamming, putting pressure on someone about their financial arrangements (including wills, property, inheritance, or financial transactions) or the misuse or stealing of property, possessions or benefits.

### **Modern slavery**

This covers slavery (including domestic slavery), human trafficking and forced labour. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse and inhumane treatment.

### **Discriminatory**

This includes types of harassment or insults because of someone's race, gender or gender identity, age, disability, sexual orientation, or religion.

### **Organisational**

This includes neglect and poor care in an institution or care setting such as a hospital or care home, or if an organisation provides care in someone's home. The abuse can be a one-off incident or repeated, on-going ill treatment. The abuse can be through neglect or poor professional practice, which might be because of structure, policies, processes, and practices within an organisation.

### **Neglect and acts of omission**

This includes ignoring medical, emotional, or physical care needs, failure to provide access to appropriate health, care and support or educational services, or not giving someone what they need to help them live, such as medication, enough nutrition and heating.

### **Self-neglect**

This covers a wide range of behaviour which shows that someone isn't caring for their own personal hygiene, health or surroundings. It includes behaviour such as hoarding.

### **Abuse can take many forms. It might not fit comfortably into any of these categories, or it might fit into more than one.**

Abuse can be carried out by one adult at risk towards another. This is still abuse and should be dealt with. The adult at risk who abuses may also be neglecting him/herself which could also be reason for a safeguarding referral.

### **Who might be an Abuser?**

Adults at risk can be abused by a wide range of people – anyone, in fact, who has contact with them. This includes family members, professional staff, paid care workers, other adults at risk, volunteers, other service users, neighbours, friends and associates, people who deliberately take advantage of vulnerable people, strangers and people who see an opportunity to abuse.

**Abuse is always wrong, but it's especially worrying when carried out by someone in a position of power or authority over someone, who uses that power to harm an adult at risk.**

### **Trauma Informed Practise**

We are striving to become a trauma-informed workforce. We recognise that trauma often affects the way people approach relationships. This is because based on our experiences we may feel unsafe, lack trust, or live with anxiety. Becoming trauma-informed is about supporting people to feel safe enough in their interactions with services to build trust, and to help people overcome any barriers to an effective helping relationship. An increased human centric approach aims to raise awareness of relevant psychological theory behind mental health and the benefits of relationship-based practice. It explores the potential impacts of trauma and adversity across a person's entire life and promotes professional practices, activities, attitudes, and behaviours that take on a trauma informed approach. We are working to embed this across the workforce to enhance our safeguarding approach.

## Low Level Concerns about Colleagues

**We want to create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour are set out.**

This is in line with the “Premier League Safer Working Practice Guidance” and “Keeping Children Safe in Education”

### Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a ‘nagging doubt’, that a person working in or on behalf of Wolves FC may have acted in a way that:

- is inconsistent with the “Premier League Safer Working Practice Guidance”, and the Safeguarding Children and Young People Policy including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered of severity to make a referral to the LADO but may meet the thresholds as defined by The FA Safeguarding Concerns in the Professional Game, Referral & Threshold Document.

Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

- being over friendly with participants
- having favourites
- taking photographs of participants on their personal mobile phone
- engaging with an adult on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language
- creating a ‘friendship’ that blurs professional boundaries

Such behaviour can exist on a wide spectrum; from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, however, in specific circumstances may not be, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the Head of Safeguarding/HR/Safeguarding Leads.

**Sharing concerns responsibly means they are dealt with sensitively and we will support those individuals who have low-level concerns raised against them and potential false allegations or misunderstandings.**

Any suspicions or concerns relating to poor practice must be reported immediately to the Designated Safeguarding Officer or the Department Manager however if a member of staff believes that this route has been ineffective, they can contact Head of Safeguarding, Head of Department, Director of HR, or the NSPCC Helpline. Staff can also follow Wolves FC whistleblowing procedures.

If the concern warrants more information (fact finding) this will be completed by the Designated Safeguarding Officer, who will consult with the Department Manager. The Head of Safeguarding must be made aware of the outcome including the case management documentation being sent for referencing to HR and disciplinary procedures may be initiated. Wolves FC Club will send a referral to The FA Safeguarding Team where repeated poor practice incidents occur.

Specifically, a referral will be made where there are three incidents of poor practice by the same individual. This is whether these incidents are for the same type of poor practice, or for different forms of poor practice

### **Position of Trust**

The government have extended the “position of trust” offences within ss 16–19 of the Sexual Offences Act 2003 to include situations where certain activities take place in a sport or religion.

The “position of trust” offences is intended to target situations where the child has some dependency on the adult involved, often combined with an element of vulnerability of the child.

This means that those in relationships of trust should not:

- Use their position to gain access to information relating to person that the individual is in a position of trust or authority over, and most certainly not an u18. for their own or others’ advantage. Such information should only be used or shared to meet the needs of the children or adult at risk.
- Use their power to intimidate, threaten, coerce, or undermine a child or adult at risk.
- Use their status and standing to form or promote inappropriate relationships; professional boundaries must be always maintained.

**This means that any sexual activity between a member of staff in a position of authority and trust and a child under 18 on a Club activity may be a criminal offence, even if that child is over the age of consent.**



# REPORTING

## Self-Referral

When colleagues and volunteers identify their own poor practice or practice which could be questioned as to their integrity, they have a duty to self-refer themselves to their manager, HR, or the Safeguarding Team.

For positive engagement with vulnerable groups, professional boundaries must always be maintained, to ensure these professional standards are upheld. It is important that colleagues and volunteers self-refer when vulnerable groups are forming an over familiar attachment with them, as discussed in the Premier League Guidance for Safer Working Practice. In addition, and in accordance with the Policy for the Management of Criminal Records, colleagues and volunteers are required, regardless of their role, to notify HR of anything that affects, or might affect, their suitability to work at the Company, including any reprimands, warnings, cautions, convictions, enquiries/investigations by a statutory agency. This also extends to those working with children and/ or adults at risk having children in their charge taken into care proceedings. At this stage the Safeguarding Team with HR will risk assess what steps need to be taken including a completion of a new criminal records check, investigating, and engaging with statutory services as examples.

**Where there is clearly an imbalance of power and staff should disclose any relationships to their managers and HR and refer to Wolves FC relationships at work policy.**

## Safeguarding Whistleblowing Policy

The club recognises the risk of things going wrong or unknowingly harbouring poor practice and believes it has a duty to identify such situations and implement measures mitigate such risks. As such, the club encourages a culture of openness and one of prevention rather than simply cure. If you feel there is a requirement to whistle blow, you should first consult your line manager. If the matter concerns the line manager, they should contact the next in line senior manager. Whistleblowing is dealt in full in the club's whistleblowing policy. If unable to raise concerns internally, please consult the NSPCC Whistleblowing Helpline on 0800 028 0285.

The club has a dedicated policy for dealing with and investigating any allegations of historical abuse. We are committed to hearing the voices and experiences of anyone that comes forward to share allegations and we will support all identified victims.

## Reporting Concerns

Although children and adults at risk can experience the same types of harm and the causes are often similar, the main difference between child protection and adult protection hinges on the right to make a choice. Where a child is at risk of serious harm, or has been seriously harmed, it is likely that action would be taken by Statutory Services to protect them whether the parents/guardians agreed. Sometimes adults at risk do not want Statutory Services to take action to protect them from harm. Taking action to protect them against their will can create a dilemma and staff are required to consult with the Safeguarding Team to ensure a balance between 'the need to protect' and the rights of the adult is attained.

# ROLES AND RESPONSIBILITIES

In addition to this policy, there are several additional policies, procedures, and guidance in place to support vulnerable groups, colleagues, volunteers, and parents/carers to understand Wolves FC and the Foundation's commitment to safeguarding.

For further information please contact the Safeguarding Team.

- **The Head of Safeguarding** - is accountable for safeguarding provision across the Club which will include the development and nurturing of a safeguarding approach which is embedded in effectively across the club. The Head of Safeguarding champions safeguarding at all areas of club activity and works collaboratively with all stakeholders to ensure safeguarding practice is good throughout the organisation.
- **Safeguarding Manager and Lead Designated Safeguarding Staff** - are responsible for ensuring that all frontline staff are adequately trained and abled to carry out their safeguarding roles and will provide advice and guidance to staff through various means of the club's communication networks.
- **Heads of Department and Senior Staff** - have specific responsibilities for safeguarding policy, procedures and appropriate systems are given to management and those involved in the recruitment, selection, and training of staff. Heads of Department and their managers are responsible for ensuring they comply with safeguarding, safer recruitment, and safe working practices in their day-to-day operation within their departments and projects.
- **All Staff** - have a responsibility to ensure anyone who may need extra help or who are suffering, or are likely to experience significant harm are supported.
- **All Staff** - have a responsibility to take appropriate action and report concerns.
- **All Staff** - should respect and abide the Club's Code of Conduct.
- **All Staff** - should work with the Designated Safeguarding Leads and the Head of Safeguarding, to deal with concerns.



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## EXTERNAL SAFEGUARDING CONTACTS:

### **Premier League**

Head of Safeguarding Jessica Addicott  
- [jaddicott@premierleague.com](mailto:jaddicott@premierleague.com)

### **NSPC**

0808 800 5000 (24-hour helpline)  
[help@nspcc.org.uk](mailto:help@nspcc.org.uk)  
[www.nspcc.org.uk](http://www.nspcc.org.uk)

### **Child Line**

0800 1111 2417  
[www.childline.org.uk](http://www.childline.org.uk)

### **Child Protection in Sport Unit**

[cpsu@nspcc.org.uk](mailto:cpsu@nspcc.org.uk)  
[www.thecpsu.org.uk](http://www.thecpsu.org.uk)

### **Ann Craft Trust**

[www.anncrafttrust.org](http://www.anncrafttrust.org)

### **CEOP**

[www.ceop.police.uk/ceop-reporting](http://www.ceop.police.uk/ceop-reporting)

### **Samaritans**

[www.samaritans.org/how-we-can-help-you](http://www.samaritans.org/how-we-can-help-you)

### **The Haven Wolverhampton**

24hr referral line: 08000 194 400  
Training on domestic violence: 01902 572128  
Fax: 01902 572144  
[info@havenrefuge.org.uk](mailto:info@havenrefuge.org.uk)  
[www.havenrefuge.org.uk](http://www.havenrefuge.org.uk)

### **Safeguarding Jericho Society**

Supported accommodation for women (age 16+) and their dependent children affected by domestic violence and homelessness.  
24-hour referral line: 01902 421732  
Fax: 01902 428778  
[jerichowolv@btconnect.com](mailto:jerichowolv@btconnect.com)

### **Wolverhampton City Council**

Housing Outreach Team provides floating support for women who are or have been experiencing domestic violence in order to help people to maintain their tenancies.  
Phone: 01902 551023  
Fax: 01902 554905  
[housing.outreach@wolverhampton.gov.uk](mailto:housing.outreach@wolverhampton.gov.uk)

### **Advocacy – One Voice**

An organisation run by disabled people offering help, advice and support to other disabled people as well as offering information, training, consultation and partnership working to other organisations on issues to do with disabled citizens' lives.  
Phone: (01902) 810016

### **Wolverhampton Safeguarding**

[www.wolverhamptonsafeguarding.org.uk/safeguarding-adults](http://www.wolverhamptonsafeguarding.org.uk/safeguarding-adults)

If you are concerned about an adult (including yourself)

**If you are suffering abuse, or you know or suspect some else is being abused call**

### **Wolverhampton Adults Services**

Monday to Thursday 8:30am to 5pm,  
Friday 8:30am to 4:30pm: 01902 551199  
For emergencies out of above hours: 01902 552999  
If immediate action is needed: dial 999



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Head of Safeguarding – Lisa Carter