



**WOLVERHAMPTON WANDERERS FC**

**SAFEGUARDING ADULT POLICY**

**MAIN DOCUMENT**

**Version 0.2**

**October 2018**

## TABLE OF CONTENTS

<b>DOCUMENT REVIEW .....</b>	<b>3</b>
<b>1. VULNERABLE ADULT POLICY .....</b>	<b>4</b>
<b>2. ROLES &amp; RESPONSIBILITIES .....</b>	<b>5</b>
<b>3. WOLVERHAMPTON WANDERERS FC VULNERABLE ADULT CODE OF CONDUCT .....</b>	<b>5</b>
<b>4. ABUSE .....</b>	<b>7</b>
<b>5. BULLYING .....</b>	<b>10</b>
<b>6. PROTECTION FROM FREEDOMS/EXTREMISM .....</b>	<b>11</b>
<b>7. STAFF RECRUITMENT .....</b>	<b>12</b>
<b>8. POLICY STATEMENT ON THE RECRUITMENT OF EX OFFENDERS .....</b>	<b>14</b>
<b>9. DISCLOSURE &amp; BARRING SERVICE .....</b>	<b>15</b>
<b>10. SELF-DECLARATION OF INFORMATION IN BETWEEN DISCLOSURE APPLICATIONS .....</b>	<b>16</b>
<b>11. SOCIAL MEDIA.....</b>	<b>16</b>
<b>12. POLICY STATEMENT ON GDPR - THE SECURE STORAGE, HANDLING, USE, RETENTION AND DISPOSAL, DISCLOSURES OF INFORMATION.....</b>	<b>17</b>
<b>13. STEWARDS SAFEGUARDING VULNERABLE ADULT POLICY .....</b>	<b>19</b>
<b>14. SAFEGUARDING PROCEDURES FOR COMPTON PARK ACADEMY .....</b>	<b>21</b>
<b>15. IMAGES OF VULNERABLE ADULTS - PARTICIPATION IN ACTIVITIES .....</b>	<b>22</b>
<b>16. UNOFFICIAL IMAGES – TAKEN BY PARENTS, CARERS, FAMILY, FRIENDS AND THE VULNERABLE ADULT THEMSELVES .....</b>	<b>25</b>
<b>17. SAFEGUARDING PROCEDURES FOR COMPTON PARK ACADEMY .....</b>	<b>26</b>
<b>18. GUIDELINES ON DEALING WITH POOR PRACTICE, ABUSE &amp; BULLYING.....</b>	<b>27</b>
<b>19. SAFEGUARDING PROCEDURES FOR WOLVES FOUNDATION .....</b>	<b>29</b>
<b>20. LISTENING TO THE VULNERABLE ADULT .....</b>	<b>31</b>
<b>21. USEFUL CONTACTS.....</b>	<b>33</b>
<b>APPENDICES 1 .....</b>	<b>34</b>
<b>APPENDICES 2 .....</b>	<b>35</b>
<b>APPENDICES 3 .....</b>	<b>37</b>
<b>APPENDIX 4:.....</b>	<b>38</b>

---

**DOCUMENT REVIEW**

Last reviewed	Reviewer	Brief detail of amendments
May 2017	P Richards	Whole policy re-written and multiple amendments made
January 2018	P Richards	Policy reviewed and additions made in respect of Social Media
June 2018	P Richards	Policy reviewed in respect of GDPR
October 2018	P Richards	Policy Updated Re Wolves Foundation

## **1. VULNERABLE ADULT POLICY**

### **1.1. GENERAL POLICY STATEMENT BY SENIOR MANAGEMENT**

- 1.1.1. Wolverhampton Wanderer's Football Club is committed to creating opportunities for adults with disabilities and mental health problems to participate in a broad spectrum of activities at the Club at the same time as creating a safer culture for the participants. The participation of adults at risk may be as players, coaches, employees, volunteers, officials, administrators or spectators
- 1.1.2. The Club has a moral, legal and social responsibility to provide a fun and safe environment for all those participating in these activities. The Club has a commitment to manage and monitor allegations of discrimination, harassment, abuse and bullying.
- 1.1.3. The Safeguarding Vulnerable Adults Policy is there to react to the occasions where proactive and preventative work has failed and where harm has occurred by acts of commission or omission and where the Vulnerable Adult has not been able to safeguard his or her self.
- 1.1.4. In particular its function is to ensure that safeguards are put in place to keep the Vulnerable Adult safe and to prevent such harm occurring again, either to the same Vulnerable Adult or to other Vulnerable Adults.
- 1.1.5. There is no 'Vulnerable Adults Act' to provide clear legislative guidance. The definition of 'Vulnerable Adult' is always open to interpretation and individuals may be vulnerable at some times and not others.
- 1.1.6. Adults have a right to self-determination. They may not wish to have others intervene to safeguard them.
- 1.1.7. Adults may consent to sexual activities and the issue of consent may affect the reporting and management of allegations.
- 1.1.8. Local authorities are organised differently to receive and manage referrals. There is not a uniform approach by the various Local Safeguarding Boards but Wolverhampton does however, have Designated Adult Safeguarding Managers
- 1.1.9. Currently the club Safeguarding Services Manager is Paul Richards

#### **1.1.1. A VULNERABLE ADULT IS DEFINED AS:**

##### 1.1.1.1. Someone who is aged 18 or over:

- Who is unable to protect him or herself against significant harm or exploitation.
- Who is or may be in need of community care services by reason of mental or other disability, increasing frailty or illness, alcohol or drug dependency.  
Or
- Who is or may be unable to take care of him or herself, (includes alcohol or drug dependency).

## 2. ROLES & RESPONSIBILITIES

- 2.1. The club has a comprehensive safeguarding structure which ensures the safety and welfare of all children and young people who engage with the club.
- 2.2. **The Managing Director:** is responsible for all aspects of the club and to ensure safeguarding is a key priority at Board Level.
- 2.3. **The Head of Operations:** is responsible for providing strategic leadership that assists the Safeguarding Services Manager to deliver the safeguarding strategy, vision, values, priorities, policies, promoting the welfare of vulnerable groups.
- 2.4. **Safeguarding Services Manager:** is responsible for the strategic and operational direction and embedding safeguarding across the club, communicating at Heads of Department level. The Safeguarding Services Manager is also lead point of contact should safeguarding concerns arise and the Lead Disclosure Officer.
- 2.5. **Designated Safeguarding Officers (DSO):** The DSO's support the Safeguarding Services manager to pro-actively promote and raise safeguarding awareness and assist with responding appropriately to safeguarding concerns and allegations.
- 2.6. **Heads of Department:** are responsible for embedding safeguarding within their own departments as well as being the point of contact should a concern arise within their own departments.
- 2.7. **All employees, workers, agency staff, consultants and volunteers:** are responsible for familiarising themselves with the club's policy and procedures, ensuring the safety and welfare of all children and young people as well as promoting best practice and creating a safe and inclusive environment to prevent harm occurring through awareness of what constitutes abuse and neglect.

## 3. WOLVERHAMPTON WANDERERS FC VULNERABLE ADULT CODE OF CONDUCT

- 3.1. The Club will abide by a Code of Conduct which states we will:
  - Respect and promote the rights, wishes and feelings of vulnerable adults.
  - Recruit, train and supervise staff to adopt best practice in order to safeguard and protect vulnerable people from abuse and themselves from false allegations.
  - Respond to complaints, concerns and allegations and implement the appropriate disciplinary and appeals procedures.

- 
- 3.2. Whilst it is hoped that the proactive preventative work, including training, vetting and providing clear policies are sufficient to safeguard all adults at Wolverhampton Wanderers Football Club, the Club recognises that it has a responsibility to safeguard Vulnerable Adults from abuse and harm and to respond where abuse and harm are perceived to have occurred.
  - 3.3. Safeguard the welfare of Vulnerable Adults at Wolverhampton Wanderers Football Club by protecting them from any significant physical, sexual and emotional harm and from neglect, bullying and financial harm within the Club. This may include training and codes of practice amongst other strategies for reducing risk
  - 3.4. Report to the appropriate authorities any concerns about abuse or harm to Vulnerable Adults whether this occurs within the Club or elsewhere and whether this be a potential criminal offence or other concern. The appropriate authorities may be internal and external to football. This will include following the Club's reporting frameworks.
  - 3.5. Ensure appropriate investigations and responses to concerns about abuse or harm within Wolverhampton Wanderers Football Club utilising the disciplinary process as appropriate. This will include work in partnership with the Police and other statutory agencies charged with investigating and responding and with the Vulnerable Adult who is believed to be at risk or believed to have been harmed.
  - 3.6. Following such investigations, Wolverhampton Wanderers FC will act to put appropriate safeguards in place to safeguard the Vulnerable Adult in the future and to reduce the risk of harm to other Vulnerable Adults in the Club.
  - 3.7. Wolverhampton Wanderers FC will report when appropriate to the Disclosure and Barring Service (DBS) anybody delivering a regulated activity for Wolverhampton Wanderers Football Club who is believed by the Club to present a risk of harm to Vulnerable Adults. Where the Club 'withdraws permission' for a person to deliver a regulated activity they will also be reported to the DBS.
  - 3.8. The Club has the power as part of the Wolverhampton Wanderers Football Club Disciplinary procedures to issue a suspension, pending a risk assessment where any one or more of the following applies:-
    - The individual fails to comply with any part of Wolverhampton Wanderers Football Club's DBS Processes.
    - The individual has been barred by the DBS from engaging in regulated activity relating to Vulnerable Adults.
    - The individual has been convicted of, or made the subject of caution for, a serious sexual, violent offence or any other offence that Wolverhampton Wanderers Football Club believes to be relevant to the care of Vulnerable Adults.
    - Following a risk assessment, the Club is satisfied on the balance of probabilities that the individual poses or may pose a risk of harm to Vulnerable Adults.

- 3.9. In addition to the DBS vetting process, applicants will be required to provide at least two references that attest to their suitability to be involved in football involving Vulnerable Adults. The spouse, cohabitee, civil partner or a family member of the person subject to this requirement cannot act as a referee for this purpose. One of the referees should be the applicant's most recent or current employer.

## **4. ABUSE**

### **4.0.1. ABUSIVE BEHAVIOUR**

- 4.0.1.1. Abusive behaviour can be assessed on a scale from poor practice, to bad practice to abuse. Abuse cannot be easily measured as an action alone. Its severity will partly be defined by the:

- vulnerability of the victim and the power differential
- nature and extent of the abuse
- length of time it has been occurring
- impact on the individual or group
- risk of it being repeated or becoming increasingly serious

- 4.0.1.2. There are different types of abuse and these are:

- Physical abuse
- Sexual abuse
- Psychological abuse
- Financial/Material abuse
- Neglect
- Discriminatory
- Bullying

- 4.0.1.3. At one end of a scale, there may be obvious signs and symptoms of abuse, but at the opposite end, the indicators may be very difficult to detect. Combinations of factors which individually might not give cause for concern could be much more worrying when considered together. The abuse may be committed by one individual against another or be institutional in that the whole organisation colludes in abusive practices either through ignorance or choice.

#### **4.0.1.4. WHERE MAY HARM OCCUR?**

- 4.0.1.5. Harm may occur anywhere in a Wolverhampton Wanderers Football Club activity or it can be reported to a Wolverhampton Wanderers Football Club representative (or indicative signs noticed) when it has occurred outside a Club activity.

#### 4.0.1.6. There are complex scenarios including:

- Vulnerable Adults playing, officiating, coaching, spectating or administering within a variety of activities at Wolverhampton Wanderers Football Club. Vulnerable Adults may be at risk of harm from other adults who may or may not be vulnerable themselves. Those doing harm to the Vulnerable Adult may be in the Wolverhampton Wanderers Football Club activity or elsewhere in the Vulnerable Adult's network. Harm may be deliberate or result from not understanding the Vulnerable Adult's needs (commission or omission).
- Vulnerable Adults may be at risk of harming others in Wolverhampton Wanderers Football Club's activities either by deliberate behaviours or by failing to understand their responsibilities to others. On these occasions the Vulnerable Adult may need
- Help and support to manage his or her behaviour in a suitable way, or may need to have certain responsibilities removed from them. Safeguards may need to be put in place to protect others.
- Adults who have been 'vulnerable' in the past who are now 'not vulnerable', (example: people recovering from mental health issues). Where these adults are seeking positions of responsibility at Wolverhampton Wanderers Football Club, but have criminal records or issues from their past which are directly related to these periods of vulnerability, detailed risk assessments will be undertaken. Assessment of suitability for their new roles requires a specific knowledge base and sensitive handling. Whilst Wolverhampton Wanderers Football Club promote a policy of inclusion, the risk assessments are conducted to measure the risk posed by somebody who is recovering from a previous period of vulnerability, considering other vulnerable adults who need safeguarding from possible harm, should the risk factors re-emerge.
- Vulnerable Adults may also be at risk of harming themselves through failing to realise and report when they need additional or different support in Wolverhampton Wanderers Football Club activities.

#### 4.0.1.7. DEFINITIONS OF ABUSE

- Physical Abuse – Including hitting, slapping, pushing, kicking, misuse of medications, restraint or inappropriate sanctions
- Sexual Abuse – Including rape and sexual assault or sexual acts to which the person has not, or could not consent and/or was pressured into consenting
- Psychological Abuse – Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, verbal abuse, isolation or withdrawal from supportive networks
- Financial/Material Abuse – Including theft, fraud, and exploitation – Wills property, inheritance, possessions or benefits



- Neglect – Ignoring medical and/or physical care needs, failure to provide access to health, social care or educational services, withholding necessities of life, e.g. medication, adequate nutrition and heating
- Discriminatory – Including racist, sexist, based on a person’s disability. (No Secrets, DH 2000)
- Bullying-either by individuals or systemically

#### **4.1. SEXUAL ABUSE**

- 4.1.1. Sexual abuse involves forcing or enticing a vulnerable adult to take part in sexual activities, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. It may involve non-contact activities, such as involving vulnerable adults in looking at, or in the production of pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways. Talking to them in a sexually explicit manner is also a form of sexual abuse.
- 4.1.2. Vulnerable adults can also be abused by other vulnerable adults. Usually, in cases of sexual abuse, it is the person’s behaviour which may cause you to become concerned, although physical signs can also be present. In all cases, vulnerable adults who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

#### **4.2. PHYSICAL ABUSE**

- 4.2.1. This may involve hitting, biting, shaking, poisoning, burning or scalding, drowning or suffocating, alcohol or drug abuse or otherwise causing physical harm to a vulnerable adult. Physical harm may also be caused when a parent or carer feigns the systems of, or deliberately causes ill health to a vulnerable adult who they are looking after. This condition is known as fictitious induced illness by proxy.
- 4.2.2. As with children vulnerable adults can collect cuts and bruises in their daily life. These are likely to be in places where there are bony parts of their body, like elbows, knees and shins
- 4.2.3. An important indicator of physical abuse is where bruises or injuries are unexplained or the explanation does not fit the injury, or when it appears on parts of the body where accidental injuries are unlikely, e.g. on the cheeks or thighs. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on vulnerable adults with different skin tones or from different racial groups and specialist advice may need to be taken.
- 4.2.4. **NEGLECT**
- 4.2.5. Persistent failure to meet a vulnerable adult’s basic physical and/or psychological needs is likely to result in serious impairment of the vulnerable adult’s health or well being. For example, failing to provide adequate food, shelter and warm clothing, failing to protect a vulnerable adult from physical harm or danger, consistently leaving vulnerable adults alone and unsupervised, or failing to ensure access to appropriate medical care or treatment. Refusal to give vulnerable adults love, affection and attention can also be a form of neglect.

### **4.3. EMOTIONAL ABUSE**

4.3.1. The persistent emotional ill-treatment of a vulnerable adult is likely to cause severe and lasting adverse effects on the person emotional development. A persistent lack of love or affection, where a vulnerable adult is constantly shouted at or taunted, making a vulnerable adult very nervous or withdrawn constitutes emotional abuse.

- It may involve communication to a vulnerable adult that they are worthless or unloved, inadequate, or valued only in terms of meeting the needs of another person.
- It may feature expectations that are not appropriate to their age or development.
- It may cause vulnerable adults to be frightened or in danger, and put them at greater risk of exploitation or corruption.

4.3.2. Racism can be categorised as emotional abuse. Emotional abuse can also take the form of vulnerable adults not being allowed to mix with the other vulnerable adults. Emotional abuse can be difficult to measure and often vulnerable adults who appear well cared for may be emotionally abused.

### **4.4. DISABLED VULNERABLE ADULTS**

4.4.1. Some disabled vulnerable adults and adults are mentally or physically more vulnerable than others, which makes it easier for abusers to exploit them. A 'vulnerable adult' is also any adult with learning or physical disability or physical or mental illness, which results in them being incapable of protecting themselves.

4.4.2. Disabled vulnerable adults may also find it more difficult to recognise and report abuse, and to be believed. Some vulnerable adults face additional vulnerability and barriers to getting help because of their race, gender, age, religion or disability, sexual orientation, social background and culture. Prejudice and discrimination (including racism) can prevent some vulnerable adults getting the help they need.

## **5. BULLYING**

5.1. The majority of calls to help lines from vulnerable adults relate to bullying. Adult representatives of Wolverhampton Wanderers Football Club have a duty of care to safeguard vulnerable adults from harm including disabled vulnerable adults and others who may be particularly vulnerable.

5.2. Victims are often shy, sensitive and perhaps anxious or insecure. They can be singled out for physical reasons, being overweight, physically small or belonging to a different race, faith, culture, or class. Vulnerable adults are vulnerable to abuse by their peers.

5.3. Bullying most commonly occurs in any place where there is inadequate supervision.

5.4. Vulnerable adults participating in any activities at Wolverhampton Wanderers Football Club have the right to be safe and happy. Bullying by Wolverhampton Wanderers employees, volunteers, parents or other vulnerable adults will not be tolerated.

- 
- 5.5. As a representative of Wolverhampton Wanderers Football Club, you have a responsibility to take all signs of bullying seriously.
- 5.6. If the perpetrator of bullying is a colleague then the procedure for reporting a concern should be followed.
- 5.7. Action to prevent Bullying and to help the victim:
- Encourage all vulnerable adults to speak and share their concern. Help the victim to speak out to tell the person in charge or someone in authority. Create an open environment.
  - Reassure the victim that you can be trusted and will help them, although you cannot promise to tell no one else.
  - Keep records of what was said (what happened, by whom and when).
- 5.8. **ACTION TOWARDS A VULNERABLE ADULT WHO IS BULLYING**
- 5.9. The Coach or Head of Department should:
- Talk with the bully/ies, explain the situation and try to get the bully(ies) to understand the consequences of their behaviour.
  - Obtain an apology from the bully/ies to the victim.
  - Inform the bully's parents.
  - Insist on the return of "borrowed" items.
  - Hold discussions amongst staff to agree specific strategies to combat bullying. Provide support for the Coach of the victim.
  - Improve sanctions against bullies (including the possibility of expulsion).
  - Encourage and support the bully to change behaviour.
  - Hold a follow up meeting with the victim's family to report on progress.
  - Inform all relevant members of staff about incidents and action taken.

## 6. PROTECTION FROM FREEDOMS/EXTREMISM

- 6.1. The terrorist threats we face now are more diverse than before, dispersed across a wider geographical area, and often in countries without effective governance. We therefore face an unpredictable situation, with potentially more frequent, less sophisticated terrorist attacks.
- 6.2. In order for Wolverhampton Wanderers to fulfil the government 'Prevent' duty, it is essential staff are able to identify where vulnerable adults could be open to radicalisation, and know what to do when they are identified. Protecting those groups from the risk of radicalisation should be seen as part of our wider safeguarding duties, and is similar in nature to protecting vulnerable adults from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.
- 6.3. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Those at risk of radicalisation may display different signs or seek to hide their views. Staff should use their

---

professional judgement in identifying vulnerable adults who might be at risk of radicalisation and act proportionately

- 6.4. Vulnerable adults may be susceptible to radicalisation by others, whether in the family or outside, and display concerning behaviour. The 'Prevent' duty does not require staff to carry out unnecessary intrusion into family life but as with any other safeguarding risk they must take action when they observe behaviour of concern.
- 6.5. Safeguarding Services Manager undertakes 'Prevent' awareness training and is able to provide advice and support to other members of staff on protecting vulnerable adults from the risk of radicalisation. It is recognised that it can be more difficult for many to attend training and we are considering other ways in which they can increase their awareness and be able to demonstrate that.
- 6.6. As explained above, if a member of staff has a concern about a particular vulnerable adult or adult they should follow the club's normal safeguarding procedures, including discussing with the Safeguarding Services Manager. In Prevent priority areas, the local authority will have a Prevent lead that can also provide support. You can also contact your local police or dial 101 (the non-emergency number). They can talk to you in confidence about your concerns and help you gain access to support and advice.
- 6.7. Concerns can also be raised by email: [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk). Tele: 020 7340 7264
- 6.8. Please note that the helpline is not intended for use in emergency situations, such as a vulnerable adult being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

## **7. STAFF RECRUITMENT**

- 7.1. Wolverhampton Wanderers Football Club recognises that anyone may have the potential to harm or abuse vulnerable adults in some way and is committed to taking all reasonable steps to ensure that unsuitable people are prevented from working with vulnerable adults or young adults.
- 7.2. **RECRUITMENT OF PAID EMPLOYEES**
- 7.3. The clubs full recruitment policy and procedures are available from the Human Resources Department. These include information and guidelines on advertising, selection procedures, and offers of employment, checks and references.
- 7.4. Further policies and procedures relating to employment are available from the Executive Assistant, on the Intranet and in the Employee Handbook.
- 7.5. **PRE-SELECTION**
- 7.6. When recruiting for a position that involves significant contact with vulnerable adults or young adults, Wolverhampton Wanderers operates a comprehensive recruitment procedure that includes:

- Completion of an Application Form that elicits information regarding an applicant's past
- Completion of a Self-Disclosure Form, which requires any applicant to declare past offences
- Verification of identity and eligibility to work in the UK
- Verification of professional qualifications
- Screening via the DBS, using the Enhanced DBS Disclosure
- Two references, including one regarding the applicant's most recent post working with vulnerable adults
- Registration with the appropriate professional body (if applicable)

7.7. **INTERVIEW**

7.8. Applicants will be required to undergo an interview to acceptable protocol and recommendations that includes questions relevant to Safeguarding Vulnerable Adults. The applicant's qualifications, identity and eligibility to work in the UK are also substantiated, and any areas for concern discussed.

7.9. **POST INTERVIEW**

7.10. In the event that the DBS Disclosure reveals undisclosed offences or issues are raised in the references and pre-employment checks, an interview will be convened at the earliest opportunity to include a member of the Executive Assistant and the Safeguarding Services Manager. An offer of employment can be withdrawn if this interview fails to satisfy the interviewers of the employee's suitability to work with vulnerable adults. In the event that an applicant commences work prior to their DBS Disclosure being received, they will be restricted from working with vulnerable adults unsupervised.

7.11. **INDUCTION**

7.12. All employees will receive a formal and informal induction. As part of this induction process, each employee will be made aware of Wolverhampton Wanderer's Safeguarding Vulnerable Adults Policy and Procedures.

7.13. **TRAINING**

7.14. In addition to the promotion of employee's attending the F.A.'s Safeguarding Vulnerable Adults workshops (where relevant), and reading the Safeguarding Vulnerable Adults Policy and Procedures, the club will ensure that each person working with vulnerable adults:

- Recognises their responsibilities to report any concerns about suspected poor practices or abuse
- Responds appropriately to concerns expressed by a young person
- Works safely and effectively with vulnerable people and protects themselves from false allegations by understanding best practice.

---

## **8. POLICY STATEMENT ON THE RECRUITMENT OF EX OFFENDERS**

- 8.1. As an organisation using the Disclosure and Barring Service (DBS), to assess applicant's suitability for positions of trust, Wolverhampton Wanderers Football Club Company Limited complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of conviction or other information revealed.
- 8.2. Wolverhampton Wanderers Football Club is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.
- 8.3. We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience.
- 8.4. A Disclosure is only requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a Disclosure is required, all application forms, job adverts and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.
- 8.5. Where a Disclosure is to form part of the recruitment process, we encourage all applications called for interview to provide details of their criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover, to a designated person within Wolverhampton Wanderers Football Club and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process.
- 8.6. Unless the nature of the position allows Wolverhampton Wanderers Football Club to ask questions about an applicants' entire criminal record we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974 as amended by the guidance of March 2014.
- 8.7. Wolverhampton Wanderers Football Club ensures that all those in Wolverhampton Wanderers Football Club who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974 as amended by the guidance of March 2014.
- 8.8. At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
- 8.9. Wolverhampton Wanderers Football Club makes every person subject of a DBS disclosure aware of the existence of the DBS Code of Practice and makes a copy available on request.
- 8.10. Wolverhampton Wanderers Football Club undertakes to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment.

- 8.11. **Having a criminal record will not necessarily bar you from working with us. This will depend on the nature of the position and the circumstances and background of your offences.**

## 7.12 EXTERNAL AGENCIES/PARTNERS

- 7.12.1 Any external agency or partner who will be engaged in any activity with a child or vulnerable adult, (whether supervised or unsupervised), will be subject of a current DBS check. No person will be allowed any unsupervised activity with a child or vulnerable adult without having undergone a DBS check.

## 9. DISCLOSURE & BARRING SERVICE

### 9.1. INTRODUCTION

- 9.1.1. The DBS helps organisations to protect vulnerable adults by screening out those who may be unsuitable to work with them. Disclosure is complimentary to the Club's recruitment practice.

#### 9.1.2. WHAT IS DISCLOSURE?

- 9.1.3. Disclosures provide details of a person's criminal record including convictions, cautions, reprimands and warnings held on the Police National Computer (P.N.C). Disclosures also contain details from lists held by the Department of Health and the Department for Education and Skills (DFES) of those considered unsuitable for this kind of work.

### 9.2. POLICY

- 9.2.1. No person working for the Club as a paid professional or as a volunteer shall have direct or unsupervised contact with vulnerable adults until the Club has received satisfactory DBS disclosure.
- 9.2.2. However, whilst awaiting disclosure the person may work with vulnerable adults under the supervision of a member of staff who has been cleared, subject to a Risk Assessment.
- 9.2.3. DBS disclosure will be repeated every three years.
- 9.2.4. All DBS requests for people working with vulnerable adults will be assessed and the EFL guidance 'Roles in Professional Football' followed and where required, an 'Enhanced' disclosure will be completed.
- 9.2.5. Wolverhampton Wanderers Football Club has made it a policy that every member of staff for whom a DBS check reveals offences or concerns will be interviewed by the Safeguarding Services Manager and Executive Assistant. A record of such an interview may be stored securely. Information relating to an individual will be treated confidentially and only shared with specific people in the Club on a 'need-to-know basis'.
- 9.2.6. As part of the recruitment process, each applicant for a post is required to complete a self-declaration form. It may be a disciplinary offence not to declare an offence on this form. The form should be submitted to the Head of Human Resources marked '**Private and Confidential**'.

---

## **10. SELF-DECLARATION OF INFORMATION IN BETWEEN DISCLOSURE APPLICATIONS**

- 10.1. Wolverhampton Wanderers place trust and confidence in their staff. If during their time working with the Club, a member of staff feels that they have been compromised or have been accused of anything which can be construed as an offence (e.g. subject of a caution, reprimand by the Police or subject to a disciplinary sanction from the FA or other organisations relating to vulnerable adults), then staff are expected to share this information with the Club by notifying their manager in writing. This ensures that everyone is working in an open and trustworthy manner.
- 10.2. The Club would like to reassure staff that the main consideration is whether the offence is one that makes the person unsuitable for their type of work.
- 10.3. Failure to declare information will inevitably does damage to the spirit of trust and confidence between the Club and staff member and will be treated as a serious matter.
- 10.4. The Club is a 'Registered Body' with the DBS and complies with the DBS code of practice, guidance and advice. The only DBS disclosure that will be portable is when an employee or applicant holds a FACA Disclosure form.
- 10.5. A Disclosure form is retained for no longer than 6 months after which it is shredded. The Club only retains information on the name, position, type of disclosure, Date of issue, Disclosure Reference Number and Recruitment decision. The information is stored on a secure database.

## **11. SOCIAL MEDIA**

- 11.1 All employees be that full time, part time or casual staff when using social media can be seen as acting as an ambassador of Wolves. This is a great responsibility and honour and when using Social Media you must ensure you act appropriately.
  - 11.1.1 Social media includes websites like Twitter and Facebook but also Apps such as Instagram and Snapchat however, the list is extensive. It is both instantaneous and public. Every tweet, post or comment made is potentially a public statement.
  - 11.1.2 All staff, including the Managing Director, Team Coach and Playing Staff, are expected to respect and uphold the reputation and traditions of the Club in all of their public statements and conduct.
  - 11.1.3 Accepting 'Friends' or 'Follow' requests is at your discretion whereas with other platforms this can be beyond your control.
  - 11.1.4 It is strictly a matter of policy that no staff member should 'follow' or allow themselves to be followed by any Wolverhampton Wanderers FC under 18 Academy or Staff member.
  - 11.1.5 It must be borne in mind that any person under the age of 18 is a child and therefore is subject of the Wolverhampton Wanderers FC Safeguarding Children Policy.



11.1.6 The Safeguarding of children and vulnerable adults is a priority for Wolverhampton Wanderers and any person found breaching this policy will be subject of disciplinary procedures which may result in verbal warnings, written warnings or dismissal.

**11.1.7 Unacceptable practice examples:**

- Sending inappropriate text messages or social media messages to children or vulnerable adults.
- Having children or vulnerable adults engaged with the club as 'friends' or 'followers' within social networking sites such as Facebook, Twitter and Instagram
- Engaging with children or vulnerable adults on 'one to one' personal electronic communications.

11.1.8 There are of course exceptions and this would include immediate family members who work within the club for example

## **12. POLICY STATEMENT ON GDPR - THE SECURE STORAGE, HANDLING, USE, RETENTION AND DISPOSAL, DISCLOSURES OF INFORMATION**

### **12.1. GENERAL PRINCIPLES**

12.1.1. As an organisation using DBS Service to help assess the suitability of applicants for positions of trust, Wolverhampton Wanderers FC complies fully with the DBS Code of Practice regarding the correct handling, use, storage and retention of disclosures information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters, which is available, to those who wish to see it on, request.

### **12.2. STORAGE ACCESS**

12.2.1. Disclosure information is never kept on an applicant's personnel file and is always kept in a lockable filing cabinet in the lockable office of the Executive Assistant. Only Executive Assistant and Safeguarding Services Manager will have access to Disclosure information. In addition the Designated Safeguarding Officer from Wolverhampton Wanderers Foundation may have access to the Disclosure information pertaining to staff in their work-groups.

### **12.3. HANDLING**

12.3.1. In accordance with Section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

### **12.4. USAGE**

12.4.1. Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

**12.5. RETENTION**

12.5.1. Once a recruitment decision has been made, we do not keep Disclosure information for any longer than is absolutely necessary. This information is retained in line with GDPR club policy and the conditions regarding safe storage and strictly controlled access will be of the highest regard.

**12.6. DISPOSAL**

12.6.1. Once the retention period has elapsed, we will ensure that any Disclosure information is immediately destroyed by secure means, i.e. by shredding. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle. We will not keep any photocopy or other image of the Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number and the details of the recruitment decision taken.

**12.7. ACTING AS AN UMBRELLA BODY**

12.7.1. Wolverhampton Wanderers FC will not act as an Umbrella Body for any other individual or body.

12.7.2 Wolverhampton Wanders FC will, upon receipt of any information relating to any previous conviction in respect of a full time/part time/temporary employee whether paid or otherwise, inform the designated body of DBS management of that conviction. This is a non-negotiable legal obligation and underpins the stance in respect of Safeguarding by the club.

### **13. STEWARDS SAFEGUARDING VULNERABLE ADULT POLICY**

- 13.1. All Wolverhampton Wanderers FC Stewards must adhere to this policy. Strict adherence to the Safeguarding policy will not only ensure the safety and welfare of our vulnerable adults, but also protect the integrity of our Stewards and our stewarding operation.
- 13.2. All Stewards' supervisors who come into, or are likely to come into contact with vulnerable adults must be fully conversant with this policy.
- 13.3. All Stewards working for Wolverhampton Wanderers FC must understand and accept that the underlying principle in their treatment of vulnerable adults is to ensure their safety and welfare at all times.
- 13.4. The club's responsibility towards a vulnerable adult begins from the moment the person enters the ground and ends when they leave the ground.
- 13.5. Stewards should always work in pairs when dealing with vulnerable adults, so that they can corroborate what was said, done or heard in the event of an allegation of improper behaviour by a Steward.
- 13.6. It is deemed not good practice to search anyone who appears to be under the age of 14 years. If a search is considered necessary, a young male must be searched by a male Steward and a young female by a female Steward. Searches must be witnessed by a second Steward and a record should be made in the Steward's Handbook of any property that is confiscated and the vulnerable adult's name.
- 13.7. As with lost vulnerable adults, any suspected lost vulnerable adult must be treated with the highest priority. Carers who have lost or become separated from the vulnerable adult, must know from notices placed around the stadium that they should contact the nearest Steward or Police Officer for immediate assistance. In the event that a vulnerable person reports him/herself missing to a Steward, in order to prevent lone-working with that vulnerable person, that Steward should pair up with another Steward as soon as possible.
- 13.8. The vulnerable person should then be accompanied to the Stand manager for that area. At all times there should be two Stewards with the person.
- 13.9. The vulnerable adult should be verbally reassured and clear information gathered in order to locate the parent/carer accompanying the person to the match.
- 13.10. The information should be relayed to the Match day Control Room where a public announcement will be made.
- 13.11. Stewards must show maximum tolerance when dealing with vulnerable people. Physical restraint must only be used as the very last resort, and then only to prevent the person harming him or her, or harming others or damaging property. It should never be used just to move a vulnerable person from one position to another. Even in the rare event of a Steward needing to separate two vulnerable adults fighting, minimum force only may be used.

- 13.12. Only in the most extreme cases of misbehaviour will it be considered necessary to remove a vulnerable adult from the stadium. If his/her behaviour is so extreme as to cause actual or potential harm, he should be taken to a place of safety within the stadium complex as dictated by the Safety Officer. The place of safety must have access to toilet facilities and a telephone. The usual place of safety will be the First Aid room. Parents should be contacted immediately and asked to collect their vulnerable adult as soon as possible. The vulnerable adult must be released into the care of an adult even if this means waiting until after the end of the match. The vulnerable adult must be accompanied by at least two stewards throughout the procedure. If the vulnerable adult is female, at least one of the stewards must be female.
- 13.13. In any of the incidents referred to above, the most senior Steward involved must make a written report of what was said, done and heard as soon as possible.
- 13.14. No vulnerable adult, including those who have been removed from the stadium may be photographed or videoed individually without parental permission.
- 13.15. Stewards will need to be especially protective of vulnerable adult during emergency or evacuation procedures. In such incidents a specific area must be allocated to unaccompanied and lost vulnerable adult in it.
- 13.16. If it is not possible to contact the parents/carers of a lost vulnerable adult, the vulnerable adult must be handed over to Police or Social Services as both organisations have a legal responsibility to take the vulnerable adult to a place of safety.
- 13.17. Stewards are entitled to ask any spectator his or her age so that he/she can be dealt with appropriately. If no answer is given, a Steward is entitled to make a decision based on the spectator's appearance and behaviour.

---

## 14. SAFEGUARDING PROCEDURES FOR COMPTON PARK ACADEMY

### 14.1. INTRODUCTION

14.1.1. These guidelines are intended to aid personnel representing Wolverhampton Wanderers & Compton Park Academy who may be in a 'Position of Trust'. This means that they are involved in caring for, training, supervising or being in sole charge of a vulnerable adult and in the course of their duties may have unsupervised contact with such a person.

14.1.2. As an employee or representative of Wolverhampton Wanderers you have a duty of care towards all of the vulnerable people that you come into contact with in the course of your employment.

#### 14.1.3. GOOD PRACTICE

14.1.4. Coaches, officials and volunteers should protect themselves and promote good practice by following these guidelines:

- Always be publicly open when working with vulnerable adults. Avoid situations where you and an individual vulnerable adult are alone and completely unobserved. If it is necessary to speak with a player one to one, it is advisable to draw the player to one side so that although private, the discussion may take place in full view of others. If it is considered that such a discussion will benefit from being away from others, a meeting should be organised with the knowledge of a senior member of staff. If possible another member of staff should always be present or doors left open. Whenever possible, parents should be present at such meetings. There should be nothing said to a young person that parents cannot hear.
- If any form of manual support is necessary it should be provided openly and in accordance with the FA Safeguarding & EFL guidelines.
- If vulnerable adults have to be supervised in changing rooms, coaches, etc. should always work in pairs. Coaches, needing to talk to young people in changing rooms should always check when, or if it is appropriate to enter the changing area. If this is likely to be the case then it should be explained to the parents prior to their vulnerable adult's involvement.
- Coaches etc. should also be aware that as a general rule they should not travel alone in a car with a vulnerable adult, however short the journey. They should not spend excessive time alone with young people away from others without undertaking a risk assessment and consulting with the Club Safeguarding Services Manager or another senior member of staff.

14.1.5. Coaches, etc. should never:

- Engage in rough, physical or sexually provocative games including horseplay and tickling
- Share a room with a vulnerable adult
- Allow or engage in any form of inappropriate touching
- Allow young people to use inappropriate language unchallenged
- Make sexually suggestive comments to a vulnerable adult or young person even in fun
- Allow allegations by a young person to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature for a vulnerable adult when they can do it for themselves
- Invite or allow a young person to visit or stay at your home unsupervised

14.1.6. If a coach or any other person, etc. accidentally hurts a vulnerable adult or causes them distress or the vulnerable adult appears to be sexually aroused by your actions or misunderstands or misinterprets something you have done, report any such incidents as soon as possible to a colleague and as soon as reasonably practicable a Senior Member of Staff who will note of the incident appropriately and inform the Club Safeguarding Services Manager.

## **15. IMAGES OF VULNERABLE ADULTS - PARTICIPATION IN ACTIVITIES**

### **15.1. WHAT ARE IMAGES OF VULNERABLE ADULTS AND WHY HAVE A CODE OF PRACTICE ABOUT THEM?**

15.1.1. Images are all photographs taken on film or digital cameras (including mobile phones) and all sorts of moving pictures – the terms “vulnerable adult” or “vulnerable adult” include anyone over the age of 18.

15.1.2. There has been much talk about whether it is safe to have images taken of vulnerable adults participating in sport. Whilst the great majority of images are appropriate and are taken in good faith, it is a fact that images can be misused and vulnerable adults can be put at risk if common – sense procedures are not observed.

15.1.3. To set out procedures, this Code of Practice has been adapted from the Premier League Code of Practice.

### **15.2. AIMS OF THE CODE OF PRACTICE**

15.2.1. First, as in all matters concerned with the Safeguarding of Vulnerable Adults, Wolverhampton Wanderers Football Club strive to achieve good practice, this policy aims to avoid three potential sources of vulnerable adult abuse; the use, adaptation, or copying of images for vulnerable adult pornography, either on the internet or in print.

- The possible identification of a vulnerable adult when an image is accompanied by significant personal information which can lead to the vulnerable adult being ‘groomed’.
- The identification and locating of vulnerable adult where there are safeguarding concerns. Such cases would include, for example, vulnerable adult who could be compromised by an image because
- They are removed from their family home for their own safety
- There are restrictions on their contact with one parent following a parental separation
- They are a witness in criminal proceedings
- Their name is placed on a Local Authority Vulnerable adult Protection Register

### **15.3. FURTHER ASSISTANCE**

15.3.1. For further assistance about this code of practice, please contact the Safeguarding Services Manager at the Club

## 15.4. THE CODE OF PRACTICE – GENERAL CONSIDERATIONS

### 15.4.1. Personnel at Wolverhampton Wanderers Football Club should:

- Communicate as widely as possible the Club's approach to the recording of images, saying that it's policy is designed to encourage best practice in the safeguarding of vulnerable adults and to prevent abuse if possible.
- Ensure parents, carers of vulnerable adults are told about the Club's images policy before the vulnerable adult participates in an Wolverhampton Wanderers activity.
- Obtain parents' or carers' consent to take images of the vulnerable adult for the purposes of the Club.
- Report any instances of inappropriate images to their line manager or the Safeguarding Services Manager without delay.

### 15.4.2. Clubs should not:

- Publish images with the full name(s) and details of the individual vulnerable adult in the Club Programme or place images containing that information either on the Club website or in the press. It is suggested that only a christian name is used to accompany a photo.
- Use an image for something other than that which it was initially agreed, e.g. published in the press when initially produced for a personal commemorative picture.
- Allow images to be taken by anyone in changing rooms, showers and toilets or anywhere else where vulnerable adults might be undressed.

### 15.4.3. Clubs should remember

- It is not an offence for someone to take appropriate photographs on public property, even if asked not to do so.
- Clubs cannot decide who can and can't take images on public property.
- Clubs can decide who can and can't take images on private property. If photographers do not comply with the Club's requirements, then they may be asked to leave.

## 15.5. THE CODE OF PRACTICE – THE PHOTOGRAPHERS

### 15.5.1. The aim of each photographer should be to help celebrate and promote football. When taking an image they should be asked to:

- focus on the activity rather than the individual vulnerable adult
- include groups of vulnerable adult rather than individuals if possible
- ensure all those featured are appropriately dressed (a minimum of vest or shirt and shorts)
- represent the broad range of youngsters participating in football – boys and girls, disabled vulnerable adults, members of minority ethnic communities.

## **15.6. DESIGNATED VULNERABLE ADULT'S PHOTOGRAPHERS**

15.6.1. One or more professional photographers engaged by the Club and those Club Staff who take images of vulnerable adult engaging in specific activities (for example Staff in the Wolverhampton Wanderers Academy) should be listed as Designated Vulnerable Adult Photographers. To achieve this:

- Wolverhampton Wanderers Football Club will screen and train all Designated Vulnerable Adult Photographers before they are included on an official list.
- we will screen proposed photographers for their suitability (just as we would check any other member of staff or volunteer working with vulnerable adults) and then provide training for them in the Club's Safeguarding Vulnerable Adult policies and procedures.

## **15.7. THE DESIGNATED VULNERABLE ADULT PHOTOGRAPHER'S INSTRUCTIONS**

15.7.1. A Designated Vulnerable Adults Photographer (whether a professional photographer or member of Club Staff) will receive clear instructions, preferably in writing, from the Club at an early stage.

- Wolverhampton Wanderers Football Club will provide them with a clear brief about what is appropriate in terms of content. Images will not be allowed to be taken outside the activity being covered.
- Wolverhampton Wanderers Football Club reserve the right to determine who will hold the images recorded and what is to be done with them.

## **15.8. PARENTS, RELATIVES, FRIENDS AND THE VULNERABLE ADULT THEMSELVES**

15.8.1. Parents, relatives and friends may want to take their own images of the vulnerable adult they have responsibility for, at the professional club and the vulnerable adult too may want to take his/her own record, however this cannot be permitted.

15.8.2. For the Academy girl's football and Wolves Compton Park Academy, it should be made clear in writing that only the Club's Designated Vulnerable Adult's Photographers, and the Designated Vulnerable Adult's Photographers from a Club against which a team is playing, may take images. The team representing Wolverhampton Wanderers Football Club will place the onus on the officials connected with the opposing team to ensure that each player has parental consent to be photographed or filmed by the official photographers.

## **15.9. OFFICIAL IMAGES – OUR DESIGNATED VULNERABLE ADULT PHOTOGRAPHERS**

15.9.1. Normally we use only Designated Vulnerable Adult Photographer's – people who have been screened and specially trained, who are either professional photographer's or members of the Club's staff.



## **16. UNOFFICIAL IMAGES – TAKEN BY PARENTS, CARERS, FAMILY, FRIENDS AND THE VULNERABLE ADULT THEMSELVES**

- 16.1. If your vulnerable adult's activity is not at our Molineux Stadium or Compton Park Academy and you want to take your own unofficial images, please ask. If it is possible, we'll let you know when and where you can take them. However, we can't always say "yes" to image taking and we ask you to respect our decision if we are unable to allow it.
- 16.2. Posing for unofficial images can get in the way of some activities, but another more important reason for our saying "no" is that it is sometimes against the law to take images of particular images – for instance, in cases where vulnerable adults have been removed from their family for their own safety, where there are disputes between parents or carers and they have refused consent. In situations like these no image taking by anyone at all, including our Designated Vulnerable Adult Photographer, is possible.

**Whatever you do, don't try to take "secret" pictures. This can lead to a multitude of problems if someone else spots you, thinks that you are acting suspiciously towards vulnerable adults and reports you to the Club or to the relevant Adult Authorities.**

### **16.1. FURTHER INFORMATION**

- 16.1.1. Our approach to the taking of vulnerable adult images is part of our commitment to Safeguarding Vulnerable Adults at the Club. If you want to find out more, please contact the Safeguarding Services Manager

---

## **17. SAFEGUARDING PROCEDURES FOR COMPTON PARK ACADEMY**

17.1. These guidelines are intended to aid personnel representing Wolverhampton Wanderers Compton Park Academy who may be in a 'Position of Trust'. This means that they are involved in caring for, training, supervising or being in sole charge of a vulnerable adult and in the course of their duties may have unsupervised contact with a vulnerable adult.

17.2. As an employee or representative of Wolverhampton Wanderers you have a duty of care towards all of the vulnerable adults you come into contact with in the course of your employment.

### **17.3. GOOD PRACTICE**

17.4. Coaches, officials and volunteers should protect themselves and promote good practice by following these guidelines:

- Always be publicly open when working with vulnerable people. Avoid situations where you and an individual vulnerable adult are alone and completely unobserved. If it is necessary to speak with a player one to one, it is advisable to draw the player to one side so that although private, the discussion may take place in full view of others. If it is considered that such a discussion will benefit from being away from others, a meeting should be organised with the knowledge of a senior member of staff. If possible another member of staff should always be present or doors left open. Whenever possible, parents should be present at such meetings. There should be nothing said to a young person that parents cannot hear.
- If any form of manual support is necessary it should be provided openly and in accordance with the FA Safeguarding & EFL guidelines.
- If vulnerable adults have to be supervised in changing rooms, coaches, etc. should always work in pairs. Coaches, needing to talk to young people in changing rooms should always check when, or if it is appropriate to enter the changing area. If this is likely to be the case then it should be explained to the parents or carers prior to their vulnerable adult's involvement.
- Coaches etc. should also be aware that as a general rule they should not travel alone in a car with a vulnerable adult, however short the journey. They should not spend excessive time alone with young people away from others without undertaking a risk assessment and consulting with the Club Safeguarding Services Manager or another senior member of staff.

17.5. Coaches, etc. should never:

- Engage in rough, physical or sexually provocative games including horseplay and tickling
- Share a room with a vulnerable adult
- Allow or engage in any form of inappropriate touching
- Allow vulnerable adults to use inappropriate language unchallenged
- Make sexually suggestive comments to a vulnerable adult even in fun
- Allow allegations by a vulnerable adult to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature for a vulnerable adult when they can do it for themselves
- Invite or allow a vulnerable adult to visit or stay at your home unsupervised

---

17.6. If a coach or any other person, etc. accidentally hurts a vulnerable adult or causes them distress or the vulnerable adult appears to be sexually aroused by your actions or misunderstands or misinterprets something you have done, report any such incidents as soon as possible to a colleague and as soon as reasonably practicable a Senior Member of Staff who will note of the incident appropriately and inform the Club Safeguarding Services Manager.

## **18. GUIDELINES ON DEALING WITH POOR PRACTICE, ABUSE & BULLYING**

18.1. Recognising abuse is not easy. Most vulnerable adults receive cuts, grazes and bruises from time to time and their behaviour may give reason for concern. There may well be reasons for these factors other than abuse, but any concern should immediately be discussed with the Club Safeguarding Services Manager to assess the situation.

Warning signs that may alert coaches to the possibility of abuse can include:

- Unexplained bruises, cuts or burns on the vulnerable adult, particularly if these are on parts of the body not normally injured in accidents.
- An injury that a parent or carer tries to hide or for which the vulnerable adult or parent gives different explanations.
- Changes in behaviour such as the vulnerable adult suddenly becoming very quiet, tearful, withdrawn, aggressive or displaying severe tantrums,
- Loss of weight without a medical explanation
- An inappropriately dressed vulnerable adult or ill-kept vulnerable adult who may also be dirty
- Sexually explicit behaviour, for instance playing games and showing awareness that is inappropriate for the vulnerable adult's age.
- Continual masturbation, aggressive or inappropriate sexual play.
- Running away from home, attempted suicides, self-inflicted injuries or high risk-taking behaviour.
- A lack of trust in adults, particularly those who would normally be close to the vulnerable adult.
- Disturbed sleep, nightmares and bed-wetting particularly if a vulnerable adult has previously been dry.
- Eating problems including over-eating or a loss of appetite

**REMEMBER, IT IS YOUR RESPONSIBILITY TO ACT ON ANY CONCERNS!**

## **18.1. LISTENING TO THE VULNERABLE ADULT**

- Listen carefully to any complaint or allegation by the vulnerable adult. Tell them and show them that you are taking them seriously
- React calmly so as not to frighten them
- Tell them it was right to say something
- Do not accuse or leap to conclusions yourself. **Do not probe. Do not ask leading questions**
- **Keep questions to a minimum**. Never stop a vulnerable adult who is freely recalling an event.
- Always reassure a vulnerable adult but do not make promises of confidentiality.
- Complete the referral form as soon as possible using direct quotes where you can recall them exactly.
- Do not ask a vulnerable adult to repeat a disclosure to another adult
- Report your concerns to the Club Safeguarding Services Manager

## **18.2. TALKING TO PARENTS AND CARERS**

18.2.1. Always discuss your concerns with the Club Safeguarding Services Manager. There may be circumstances where a parent is implicated in alleged abuse. Contact with parents could be delayed until you have sought advice from one of the professional agencies who have been notified.

## **18.3. RESPONDING TO ABUSE: WHAT TO DO IF YOU ARE CONCERNED**

18.3.1. It is not your responsibility to decide if vulnerable adult abuse has occurred, but it is your responsibility to take action, however small your concern.

18.3.2. Inform the Club Safeguarding Services Manager who will take responsibility for seeking any additional advice and for contacting Social Services, the Police or NSPCC who are trained to deal with such situations and have the necessary legal power to protect the vulnerable adult.

18.3.3. In the event that the Club Safeguarding Services Manager is unavailable to consult and there is some urgency about the vulnerable adult's circumstances, you should contact one of the above services yourself. Social Workers should be happy to discuss a scenario to advise on whether a full referral is necessary.

18.3.4. Additionally contact can be made with the Local Authority Designated Officer (LADO) to discuss the scenario of your concern.

## **18.4. ALLEGATIONS OF ABUSE AGAINST A MEMBER OF STAFF/VOLUNTEER**

18.4.1. Any concern should be referred to the Club Safeguarding Services Manager so that the appropriate safeguarding procedure can be followed

18.4.2. If your concern is about the Club Safeguarding Services Manager, then contact the Executive Assistant at Wolverhampton Wanderers FC

### **18.4.3. CONFIDENTIALITY**

18.4.4. It is crucial that confidentiality is maintained for all concerned. Information should be handled and shared on a need to know basis only.

This includes the following people:

- The Club Safeguarding Services Manager
- The Wolverhampton Wanderers FC Education & Welfare Officer
- The Parents of the vulnerable adult who is alleged to have been abused
- L/A Vulnerable Adult Services Directorate/ Police/ NSPCC

## **19. SAFEGUARDING PROCEDURES FOR WOLVES FOUNDATION**

### **19.1. INTRODUCTION**

19.1.1. This policy is intended to aid personnel representing Wolves Foundation who may be in a 'Position of Trust'. This means that they are involved in caring for, training, supervising or being in sole charge of a vulnerable adult and in the course of their duties may have unsupervised contact with a vulnerable adult.

19.1.2. As an employee or representative of Wolverhampton Wanderers FC you have a duty of care towards all of the vulnerable adults that you come into contact with in the course of your employment.

19.1.3. The guide refers to the Wolves Foundation Safeguarding Officer. At present this position is held by Laura Nicholls.

19.1.4. Coaches, officials and volunteers should protect themselves and promote good practice by following these guidelines

- Always be publicly open when working with young people. Avoid situations where you and an individual vulnerable adult are alone and completely unobserved. If it is necessary to speak with a player one to one, it is advisable to draw the player to one side so that although private, the discussion may take place in full view of others. If it is considered that such a discussion will benefit from being away from others, a meeting should be organised with the knowledge of a senior member of staff. If possible another member of staff should always be present or doors left open. Whenever possible parents should be present at such meetings. There should be nothing said to a young person that parents cannot hear.

- If any form of manual support is necessary it should be provided openly and in accordance with the FA Safeguarding/EFL guidelines, i.e., “avoid unnecessary physical contact. Touching can be ok and appropriate as long as it is not intrusive or disturbing to the player. If there is need for physical contact (e.g., in guiding players into position on the training field or comforting a young player who is upset), be thoughtful. You should first ask the player’s permission and be sensitive to their reaction and respond appropriately”.
- If young people have to be supervised in changing rooms, coaches, etc. should always work in pairs. Coaches, needing to talk to young people in changing rooms should always check when, or if it is appropriate to enter the changing area. If this is likely to be the case then it should be explained to the parents prior to their vulnerable adult’s involvement.
- Coaches etc. should also be aware that as a general rule they should not travel alone in a car with a vulnerable adult, however short the journey. They should not spend excessive time alone with young people away from others without undertaking a risk assessment and consulting with the Safeguarding Services Manager or another senior member of staff at Wolves Foundation.

#### 19.1.5. Coaches and/or officials also must not:

- Engage in rough, physical or sexually provocative games including horseplay and tickling
- Share a room with a vulnerable adult
- Allow or engage in any form of inappropriate touching
- Allow young people to use inappropriate language unchallenged
- Make sexually suggestive comments to a vulnerable adult even in fun
- Allow allegations to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature for a vulnerable adult when they can do it for themselves
- Invite or allow a vulnerable adult to visit or stay at your home unsupervised

19.1.6. If a coach, or any other person accidentally hurts a vulnerable adult or causes them distress or the vulnerable adult appears to be sexually aroused by your actions or misunderstands or misinterprets something you have done, report any such incidents as soon as possible to a colleague (preferably the Safeguarding Services Manager), and make a brief note of it.

## **19.2. IDENTIFYING SIGNS OF POSSIBLE ABUSE**

19.2.1. Most vulnerable adults receive cuts, grazes and bruises from time to time and their behaviour may give reason for concern. There may be reasons for these factors but any concern should immediately be discussed with the Safeguarding Services Manager to assess the situation.

19.2.2. Warning signs that may alert coaches to the possibility of abuse can include:

- Unexplained bruises, cuts or burns on the vulnerable adult, particularly if these are on parts of the body not normally injured in accidents.
- An injury that a parent or carer tries to hide or for which the vulnerable adult or parent gives different explanations.
- Changes in behaviour such as the vulnerable adult suddenly becoming very quiet, tearful, withdrawn, aggressive or displaying severe tantrums,
- Loss of weight without a medical explanation

- An inappropriately dressed vulnerable adult or ill-kept vulnerable adult who may also be dirty
- Sexually explicit behaviour, for instance playing games and showing awareness that is inappropriate for the vulnerable adult's age.
- Continual masturbation, aggressive or inappropriate sexual play.
- Running away from home, attempted suicides, self-inflicted injuries or high risk-taking behaviour.
- A lack of trust in adults, particularly those who would normally be close to the vulnerable adult.
- Disturbed sleep, nightmares and bed-wetting particularly if a vulnerable adult has previously been dry.
- Eating problems including over-eating or a loss of appetite

## **REMEMBER, IT IS YOUR RESPONSIBILITY TO ACT ON ANY CONCERNS!**

### **20. LISTENING TO THE VULNERABLE ADULT**

- Listen carefully to any complaint or allegation by the vulnerable adult. Tell the vulnerable adult and show them that you are taking them seriously
- React calmly so as not to frighten the vulnerable adult
- Tell the vulnerable adult that they are not to blame and that it was right to tell
- Do not accuse or leap to conclusions yourself. Do not probe. Do not ask leading questions
- Keep questions to a minimum. Never stop a vulnerable adult who is freely recalling an event.
- Always reassure a vulnerable adult but do not make promises of confidentiality.
- Complete the "Cause for Concern" report attached to the back of this guide as soon as possible using direct quotes where you can recall them exactly.
- Do not ask a vulnerable adult to repeat a disclosure to another adult
- Report your concerns to the Safeguarding Officer

#### **20.1. TALKING TO PARENTS AND CARERS**

20.2. Always discuss your concerns with the Club Safeguarding Services Manager. There may be circumstances where a parent is implicated in alleged abuse. Contact with parents could be delayed until you have sought advice from one of the professional agencies who have been notified.

#### **20.1. RESPONDING TO ABUSE: WHAT TO DO IF YOU ARE CONCERNED**

20.1.1. It is not your responsibility to decide if vulnerable adult abuse has occurred, but it is your responsibility to take action, however small your concern.

20.1.2. Inform the Club Safeguarding Services Manager who will take responsibility for seeking any additional advice and for contacting the local Families Social Care Department, the Police or

NSPCC who are trained to deal with such situations and have the necessary legal power to protect the vulnerable adult.

20.1.3. In the event that the Club Safeguarding Services Manager is unavailable to consult and there is some urgency about the vulnerable adult's circumstances, you should contact one of the above services yourself. Social Workers should be happy to discuss a scenario to advise on whether a full referral is necessary.

20.1.4. Additionally contact can be made with the Local Authority Designated Officer (LADO) to discuss the scenario of your concern.

## **20.2. ALLEGATIONS OF ABUSE AGAINST A MEMBER OF STAFF/VOLUNTEER**

20.2.1. Any concern should be referred to the Club Safeguarding Services Manager so that the appropriate safeguarding procedure can be followed

20.2.2. If your concern is about the Club Safeguarding Services Manager, then contact the Executive Assistant at Wolverhampton Wanderers FC

### **20.2.3. CONFIDENTIALITY**

20.2.4. It is crucial that confidentiality is maintained for all concerned. Information should be handled and shared on a need to know basis only.

This includes the following people:

- The Club Safeguarding Services Manager
- The Wolverhampton Wanderers FC Education & Welfare Officer
- The Parents of the vulnerable adult who is alleged to have been abused
- L/A Services Directorate/ Police/ NSPCC



## 21. USEFUL CONTACTS

### INTERNAL CONTACTS

Safeguarding Services Manager: Paul Richards

Mobile: 07833 051063

Email: [paulrichards@wolves.co.uk](mailto:paulrichards@wolves.co.uk)

Education & welfare Officer - Wolves Academy: Nick Loftus - Head of Education & Welfare

Mobile: 07968 947554

Email: [nataliedeakin@wolves.co.uk](mailto:nataliedeakin@wolves.co.uk)

Safeguarding Officer – Wolves Foundation: Laura Nicholls

Tel: 01902 687033

Email: [lauranicholls@wolves.co.uk](mailto:lauranicholls@wolves.co.uk)

Executive Assistant/Human Resources: Lin Kennings

Tel: 01902 687035

Email: [linkennings@wolves.co.uk](mailto:linkennings@wolves.co.uk)

### EXTERNAL CONTACTS

Premier League Head of Safeguarding: **Jess Addicott**

Premier League  
30 Gloucester Place  
London  
W1U 8PL

**T:** +44 (0) 20 7864 9000

**D:** +44 (0) 20 7864 9173

**M:** +44 (0) 7917 204 890

**E:** [jaddicott@premierleague.com](mailto:jaddicott@premierleague.com)

Wolverhampton Authority Safeguarding Board: (LADO)

Tel: 01902 550655/0661

Social Care Duty and Assessment Team 01902 555392

Emergency Duty Team (out of hours) 01902 55299

Local Authority Designated Officer  
(Allegations against staff and Volunteers) 01902 550477

Police 101

Childline 0800 1111

FA/NSPCC Child Protection Helpline 0808 800 5000 (10.00am-6.00pm)

Birmingham County FA Safeguarding Officer

Richard Watson

[Richard.Watson@birminghamfa.com](mailto:Richard.Watson@birminghamfa.com)

## **APPENDICES 1**

### **WOLVERHAMPTON WANDERERS CLUB CODE OF CONDUCT**

**Wolverhampton Wanderers FC will endeavour at all times and in any way possible to:**

- Respect and promote the rights, wishes and feelings of vulnerable adults.
- Recruit, train and supervise staff to adopt best practice in order to safeguard and protect young people from abuse and themselves from false allegations.
- Respond to complaints, concerns and allegations and implement the appropriate disciplinary and appeals procedures.

---

## APENDICES 2

### DISCLOSURE AND BARRING SERVICE CODE OF PRACTICE

#### INTRODUCTION

The Disclosure and Barring Service (DBS) was established in December 2012 under Part V of the Protection of Freedoms Act (POFA)<sup>1</sup> to undertake disclosure and barring functions. There are specific legal requirements around these checks. Disclosure functions are set out in Part V of the Police Act 1997,<sup>2</sup> which requires Registered Bodies to adhere to this Code of Practice.

#### WHO DOES THIS CODE APPLY TO?

The Code of Practice applies to all Registered Bodies with the Disclosure and Barring Service (DBS) under section 120 of the Police Act 1997 (Registered Bodies) and recipients of Update Service information under section 116A of the Police Act 1997. This includes those Registered Bodies that provide an umbrella function to non-registered organisations. The Code refers to any information exchanged between DBS and the Registered Body.

The Code of Practice does not apply to other third parties. The DBS will seek to ensure compliance with the Code through the full range of DBS assurance management processes.

All applicants for a DBS check should be made aware of this Code of Practice and provided with a copy on request.

#### DISCLOSURE OFFENCES: SECTIONS 123 AND 124 OF THE POLICE ACT 1997<sup>3</sup>

Although certificates are now provided directly to the applicant, registered bodies will receive personal information related to applications and, where registered bodies are also employers, voluntary sector organisations or licensing authorities, will receive disclosure information when certificates are provided to them by their employees or applicants for posts, including volunteers.

Recipients of disclosure information, through electronic means or via the applicant's copy of the disclosure, must note that it is an offence to disclose information contained within a DBS Certificate to any person who is not a member, officer or employee of the Registered Body or their client, unless a relevant legal exception applies. Furthermore, it is also an offence to:

Disclose information to any member, officer or employee where it is not related to that employee's duties

Knowingly make a false statement for the purpose of obtaining, or enabling another person to obtain, a Certificate

Revised Code of Practice for Disclosure and Barring Service Registered Persons Registered Bodies and those in receipt of Update Service information believed to have committed an offence will be liable to prosecution, suspension or de-registration.

**WHAT HAPPENS IF THE CODE IS BREACHED?**

The Police Act 1997 (Criminal Records) (Registration) Regulations 2006<sup>4</sup> sets out Conditions of Registration. Regulation 7(h) is for compliance with the Code of Practice issued under section 122 of the Act.

Failure to comply with Conditions of Registration can result in the suspension or cancellation of registration. This follows a set legislative process with clear timescales.

Failure to comply with requirements set out in the Data Protection Act may also result in enforcement action from the Information Commissioner's Office (ICO).

**APENDICES 3****THE CODE OF PRACTICE – THE PHOTOGRAPHERS**

The aim of each photographer should be to help celebrate and promote football. When taking an image they should be asked to:

- Focus on the activity rather than the individual vulnerable adult
- Include groups of vulnerable adults rather than individuals if possible
- Ensure all those featured are appropriately dressed (a minimum of vest or shirt and shorts)
- Represent the broad range of youngsters participating in football – boys and girls, disabled vulnerable adults, members of minority ethnic communities.

**APPENDIX 4:**

**WHAT TO DO – RESPONDING TO A CONCERN/REPORT/ALLEGATION**

