



BOLTON WANDERERS FOOTBALL CLUB ADDITIONAL NEEDS & VULNERABLE ADULTS POLICY

Introduction

The board of Bolton Wanderers football club (BWFC) acknowledges and accepts it has a statutory obligation and responsibility for the wellbeing and safety of all adults at risk who are under the club's care, utilising the club's facilities or in its employment. everyone working at the club has a "duty of care" to safeguard adults at risk by creating an environment that protects them from harm.

The wellbeing of adults at risk is paramount, and all staff must make themselves aware of the clubs safeguarding adults policy. the following guidelines will be supplemented by in-service training and additional guidance accordingly.

There are differences between the policies and procedures for safeguarding children and safeguarding adults. These differences include:

- The rights of adults to make their own choices and decisions;
- Developing a culture that involves adults and consults them on all decisions affecting them;
- Laws, government guidance, and football regulations.

Because of these differences, a Safeguarding Adults policy must stand separately to a Safeguarding Children policy.

1. Safer Structures

The safeguarding Additional Needs & 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.

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.

2. Definition of a Vulnerable Adult

Under the Care Act 2014, the safeguarding adults procedures apply to anyone aged 18 or over who is in need of care and support and is at risk of or is experiencing, abuse or neglect, and is unable to keep themselves safe from significant harm or exploitation because of their care and support needs.

Abuse is the harming of another individual usually by someone who is in a position of power, trust or authority over that individual. The harm may be physical, organisational, psychological or emotional, or it may be directed at exploiting the vulnerability of the victim in more subtle ways (for example, through denying access to people who can come to the aid of the victim, or through misuse or misappropriation of his or her financial resources). The threat or use of punishment is also a form of abuse. In many cases, it is a criminal offence.

Capacity refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that the individual has the capacity to make a decision unless it can be established that they lack capacity as defined in the Mental Capacity Act 2005. Assessing Capacity can also be linked to the Mental Capacity Act 2005, especially regarding fluctuating capacity or specific decision making. It's important to respect autonomy balanced with safeguarding needs, with clear referral pathways when explicit consent cannot be obtained.

Consent - adults at risk should be provided with the support and information to empower the individual to make their own decisions. We recognise that adults have a right to independence, choice and self-determination including control over information about themselves. To this





aim, staff are expected only to provide accessible information to the individual so that they may make informed decisions about the risks, benefits and consequences. Staff are **not** expected to support the Adult at Risk to make a decision, and as such should refer to the Designated Safeguarding Officer. The Designated Safeguarding Officer may determine that explicit consent is not required under the following circumstances;

- If other people appear to be at risk of harm (adults or children).
- If there is a legal restriction' or an overriding public interest.
- If the person is exposed to life threatening risk and they are unreasonably withholding their consent.
- If the person has impaired capacity or decision making in relation to the safeguarding issues and the withholding of consent.

3. Rules and Regulations

In the management of its programmes, the discharge of its functions, and in implementing this policy and procedure BWFC will remain mindful of it's 'duty of care' and other legal obligations such as those set out in the Health and Safety at Work Act 1974, Data Protection Act 2018, Equality Act 2010 and Protection of Freedoms Act 2012.

In the case of adults at risk, the Club is also mindful of its responsibilities under the following legislation and guidance;

- **The Care Act 2014**
- **Care and Support Statutory Guidance (updated October 2018)**
- **Sexual offences act 2003**
- **Safeguarding Vulnerable Groups Act 2006**
- **Mental Capacity Act 2005**
- **Serious Crime Act 2015**
- **Counter Terrorism and Security Act 2015 (Prevent Strategy)**
- **The Prevent Duty Guidance for England and Wales (2015)**
- **Human Rights Act 1998**





- **Domestic Violence, Crime and Victims Act 2014**
- **SEND Code of Practice 2025**

English Football League Rules and guidance. Bolton Wanderers Football Club (the club) is fully committed to ensuring that the best practice recommended by these bodies is employed throughout the Club.

The Club also recognises its responsibility to work with other agencies, including the Local Safeguarding Adults Board to protect adults at risk from harm and to respond to safeguarding concerns.

4. Review

This policy will be reviewed annually or if there is a statutory legislative or organisational change, or following a safeguarding incident, concern or allegation whereby the policy is found to be in need of revision to ensure the aims and key principles are met. All policy documents and reviews will be submitted to the Board for approval.

5. Aims, Key Principles & Contacts

BWFC 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. BWFC has a moral, legal and social responsibility to provide a fun and safe environment for all those participating in these activities.

Work with Adult groups of both sexes is carried out under the direction of Bolton Wanderers. The following is the Club Policy and Procedures for working with these groups. The Club has a commitment to manage and monitor allegations of discrimination, harassment, abuse and bullying.





Club to deliver annual Safeguarding Adults training with refresher sessions. BWFC to support staff about emerging risks like online exploitation, modern slavery, and digital safeguarding relevant to adults with additional needs.

The aims of the club's Safeguarding Vulnerable Adults Policy are:

- To safeguard all adults at risk who interact with the Club.
- To demonstrate best practice in the area of safeguarding adults at risk;
- To positively reflect and promote the club values in regard to safeguarding;
- To develop a positive and pro-active welfare programme to enable all adults at risk to participate in an enjoyable and safe environment;
- To promote high ethical standards throughout the club.

The key principles underpinning this policy as defined in The Care Act are:

- Empowerment - people being supported and encouraged to make their own decisions and informed consent;
- Prevention - it is better to take action before harm occurs;
- Proportionality - the least intrusive response appropriate to the risk presented;
- Protection - support and representation for those in greatest need;
- Partnership - local solutions through services working with their communities;
- Accountability - accountability and transparency in delivering safeguarding.

Safeguarding Contacts

The Senior Safeguarding Manager (SSM) is the person who has overall responsibility for child protection within BWFC and the Designated Safeguarding Officer (DSO) is the person who has the Safeguarding responsibility within the Academy. Our Vulnerable Adult

Head of Safeguarding (HOS) is Joe Shaw - 07512 324022 – jshaw@bwfc.co.uk

Our Vulnerable Adult & Disability Liaison Officer (VASO) is Daniel Scott – dscott@bwfc.co.uk





Matchday Designated Safeguarding Officer (MDSO) is Steve Walton - swalton@bwfc.co.uk

Head of People is Danielle Heap - Dheap@bwfc.co.uk

6. Whistleblowing

Whistle-blowing in a safeguarding context means revealing and raising concerns over misconduct or malpractice within an organisation, or within an independent structure associated with it. The club whistleblowing policy can be found on the clubs website and is also a route to report adult safeguarding concerns

It can be used as an early-warning system or when it is recognised that appropriate actions have not been taken. This approach or policy is adopted in many different walks of life.

Any individual with concerns about a colleague's conduct towards an Adult at Risk can also use whistle-blowing by calling 0800 169 1863 and asking for The FA's safeguarding team or via email to: safeguarding@TheFA.com.

Bolton Wanderers FC's own reporting form can be accessed via the clubs official website here:

<https://www.bwfc.co.uk/club/one-wanderers-family-safeguarding/report-concern>

Bolton Wanderers FC Whistleblowing Policy can be accessed via the clubs official website here:

<https://cdn.bwfc.co.uk/sites/default/files/202409/2425%20BWFC%20Whistleblowing%20Policy.pdf>

7. Safer Recruitment

As part of Bolton Wanderers Football Club, Safeguarding Children Policy and Recruitment Policy, we follow safer recruitment guidelines and as such it is applicable to vulnerable adults. An important element of this is ensuring that we recruit the best people for roles working with





children and young people across the Club through a safer recruitment process, which is supported by the Club's Recruitment Policy. This policy applies to all roles, whether paid or not.

Staff Training & Awareness

This policy and procedure is issued to all employees at induction and is also available to all employees on the Intranet. The DSO holds specific Safeguarding qualifications relevant to the role. The Disability Access Officer is also trained specifically in relation to Safeguarding Adults at risk.

Disclosure and Barring Service (DBS) Checks

Whose responsibility is it to identify who requires a DBS check?

- This is the responsibility of the Line Manager / Recruiting Officer
- If you feel the role falls into the above then you must follow the below:

Steps to take at Recruitment stage:

- Prior to starting the process you will need to identify if the role falls into the 'regulated activity'
- If you have any concerns identifying this then seek further guidance from the Senior Safeguarding Manager or Designated Safeguarding Officer Lead.
- You will need to consider the interview stage and exploring the applicant's suitability.
- During interview you will need to discuss and make the applicant aware that a DBS is required.
- Once the appointment is made and without delay the applicant will receive an email from GBG online; from here the applicant will be asked to complete the online application. The applicant will then be asked to provide 3 forms of ID, (to include their full name, address and date of birth). The same ID will then be required for the club's verifiers to confirm and sign off. A certificate will be sent through to the applicant in due course. The original needs to be brought into the club for confirmation.
- If they start employment with the DBS having been returned then they **MUST NOT** have any unsupervised activity with Children.
- If they have a current DBS (issued within the last month) then this can be submitted and in place to cover whilst we are applying for one ourselves.





- Each DBS check will cover the individual for 3 years, and the club's Database Administrator will notify each month on those expiring in 2 months – giving us 8 weeks or so to complete the application form and get the certificate back.
- Ongoing checks – Within this 3 year period, each year those with a DBS check will be required to sign a declaration to confirm that nothing has changed. The Database Administrator as administrator will flag to the Designated Safeguarding Officer of that area each month when these are due.

Safer Recruitment Best Practice

When recruiting staff or volunteers to work with children, always remember to follow recruitment best practice. This means:

- All candidates for any advertised role must complete a written application.
- Application forms should include all relevant information and make clear that references will be sought after the offer of employment is made.
- Advertisements should include a statement of the Club's commitment to safeguarding. The current statement is "Bolton Wanderers Football and Athletic Club, is an Equal Opportunities Employer and recognises the importance of safeguarding children and vulnerable adults in our work place."
- Advertisements should say that successful candidates will need to have an Enhanced DBS check.
- During the shortlisting process, make a note of any discrepancies such as gaps in their employment history to raise with the individual if they are short-listed for interview.
- Interview panels should have at least two members.
- Interviews should explore the candidate's suitability to work with children.
- Ideally being able to look at original documents when checking the candidate's identity and qualifications.
- Only a verbal offer will be made whilst a DBS check is done, and the offer of employment will be subject to a DBS check coming back within the probationary period at the latest. This is expected for volunteer roles as well.

It is expected that no post will be offered until the following has been confirmed:

- The candidate has permission to work in the UK.





- The candidate is not on the DBS barred lists.

Equal Opportunities

The Club is committed to providing equal opportunities for all staff, players and supporters. The Club's policy on equal opportunities can be found in the Employee Cascade account.

8. Recognition – Signs of Abuse

These can be classed as **Physical, Sexual, Emotional and Neglect.**

Physical

Identification. The first task by the staff member should be to check out the incident or injuries, which have aroused their concern. Speaking with the child or young person may do this. **NO PHYSICAL** examination should be undertaken.

Satisfactory Explanations. If the staff /volunteer are satisfied with this explanation a note should be made of the incident and the DSO contacted. This is to ensure that the DSO is alerted to a pattern of repeated incidents.

Unsatisfactory Explanations. If the staff member /volunteer is still concerned they should contact the DSO.

Serious Incidents. Some serious injuries may need immediate medical attention and the staff member, volunteer should ensure this happens. A record should be made and reported to the DSO and kept securely

When a referral has been made to the DSO every co-operation should be given to this person and or the Key Partner in any arrangements they may wish to make for the child or young person.

Sexual

Identification. Child sexual abuse usually comes to light in a different way to Physical, emotional abuse or neglect. Staff or volunteers may become concerned about a change in the



child's or young person's behaviour or personality. The most usual route is that they confide in the member of staff / volunteer. This is described as Disclosure.

Appropriate action. It is not the staff member / Volunteers role to discuss the details with the young person, or their parent or guardian, but to listen, reassure and support the young person. Staff members / Volunteers should not ask leading questions or interrogate the young person as if a referral is made to other key partners, the young person will be interviewed and it is important not to subject them to unnecessary questioning. Any staff member or volunteer who has concerns must report these to the DSO.

Grooming

Grooming is defined as developing the trust of an individual and/or their family for the purposes of sexual abuse, sexual exploitation or trafficking. Grooming can happen both online and in person.

Peer-on-peer abuse

Children and young people can be taken advantage of or harmed by adults and by other Children. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between Children and within Children's relationships (both intimate and non- intimate).

Emotional

Emotional abuse is present in all other forms of abuse but it can stand alone.

It is defined as the actual or likely severe adverse effect on the emotional and behavioural development of a child / young person caused by persistent or severe emotional ill treatment.

The role of the staff member / volunteer is to recognise and record concerns and consult with the DSO.

Neglect

For neglect to be considered it needs to be persistent or severe, resulting in a significant impairment of the child's or young person's development. As with emotional abuse it is the role of the staff member / volunteers role to recognise and record, then consult with the DSO who will refer where appropriate.





Financial or material abuse – _includes theft, fraud, exploitation, internet scamming, coercion in relation to an adults financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Modern slavery – _encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory abuse – _includes hate crime, forms of harassment, slurs or similar treatment because of the individuals' race, sex, gender identity, age, disability, sexual orientation, religion or belief, pregnancy or marital status.

9. Responding to a Report or Suspicion

Responding to a Report or Suspicion

A Designated Safeguarding Officer or the Head of Safeguarding should be contacted as early as possible and within 24 hours in any circumstance, however it is recognised that an individual may need to respond to a situation immediately. With this in mind the following guidelines offer help and support in responding to abuse or a suspicion of abuse or poor practice.

Do:

Ensure the individuals immediate safety; if emergency medical treatment or protection from a perpetrator is needed, call the emergency services immediately;

Reassure the individual that any allegations will be taken extremely seriously;

Reassure the individual that they are right to tell you;

Be honest about your own position, who you have to tell and why;

Tell the individual what you are doing and when, and keep them up to date with what is happening;

Take further action – _you may be the only person in a position to prevent future abuse;



Write down everything said and what was done (handwritten is preferable) and sign and date the notes. An Incident Report Form should be used where possible and, in any case, a referral must be made to the club within 24 hours of the incident taking place.

Don't:

Make promises you cannot keep or to keep secrets/confidentiality;

Interrogate the individual - it is not your job to carry out an investigation – _this will be up to the local authority/Police who have experience in this;

Cast doubt on what is being said, don't interrupt or change the subject.

Say anything that makes the individual feel responsible for the abuse.

DOING NOTHING IS NOT AN OPTION; IT IS YOUR RESPONSIBILITY TO ACT.

Make sure you tell a Designated Safeguarding Officer immediately, they will know how to follow this up and where to go for further advice.

10. What can you do to support vulnerable adults and people with additional needs?

1. Detailed risk assessment processes for activities involving adults with additional needs.
2. Promote physical access and sensory safety considerations at club facilities.
3. Expand on collaboration with Local Safeguarding Adults Boards and other agencies
4. Precise and confidential record-keeping aligned with GDPR and safeguarding best practice.
5. Specify timescales for reporting concerns internally and to authorities.
6. We encourage all Volunteers, Staff and Supporters to complete the free, online FA 'Safeguarding Adults' Course:

<https://learn.Englandfootball.com/courses/safeguarding/safeguarding-adults-course>

Designed for volunteers and staff, some players, carers, personal assistants and others might also like to complete this course. It's there to help everyone have a shared understanding of





safeguarding adults in open-age adult disability football. It's free and can be taken on mobile devices so please encourage all staff and volunteers to complete it.

11. Links and Supporting Documents

Safeguarding Adults In Disability Football: <https://www.thefa.com/football-rules-governance/safeguarding/section-10-safeguarding-adults>

Bolton Wanderers Safeguarding Handbook: <https://cdn.bwfc.co.uk/sites/default/files/2024-09/2425%20BWFC%20Safeguarding%20Handbookv2.pdf>

Policy signed by:

Role: Chief Executive Officer

Signed: 

Date: 19 February 2026

Date of Review: July 2026

