

# DSW Adults at Risk Welfare and Safeguarding Policy



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# Section 1:

## Disability Sport Wales (DSW) Adults at Risk Welfare and Safeguarding Policy

### 1.1 Key principles underpinning the DSW Adults at Risk Welfare and Safeguarding Policy

Disability Sport Wales' primary focus is to work with disabled children, young people and adults, to provide and support opportunity to participate, compete, coach or be coached, officiate or become an official, or work (as a volunteer or within a paid role) within (disability) sport. The publication of 'No Secrets' by the Department of Health in England, and 'In Safe Hands' by the Welsh Government in 2000, was in response to a number of serious incidents involving the abuse of adults at risk, where gaps in process were identified and action was slow as a consequence.

DSW are committed to the fact that every (disabled) person has the right to become hooked on sport for life, in an enjoyable, safe environment, and be protected from harm. Safeguarding in DSW is about ensuring that the environment is appropriate for the (disabled) person, and tailored to their needs so that they have a positive experience of their sport, and do this without risk of or actual harm occurring.

All adults are entitled to live their life free from harm and abuse; this is a fundamental human right. In some cases adults will be able to protect themselves from harm, but in others some adults may be a greater risk of experiencing harm and/or abuse as a consequence of their circumstance or situation which may enhance the level of risk of harm. The term 'adult at risk' replaces the previously used term 'vulnerable adult' because it takes the emphasis off the characteristics of the individual concerned. DSW are committed to ensuring that it is proactive and supportive in ensuring that circumstances, situations or environments which exist around those people who are defined as, or considered to be adults at risk, are safe.

#### 1.1.1 Definition: Adult at Risk

*An 'Adult at Risk' is someone who is over 18 years old, and:*

- *who is, or may be in need of community care services by reason of mental or other disability, age or illness, and*
- *who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation*

*An adult at risk may be a person who:*

- *has a physical, intellectual or sensory impairment*
- *is frail due to ill health*
- *has mental health needs including dementia or a personality disorder*
- *misuses alcohol or other substances*
- *is unable to demonstrate the capacity to make a relevant decision and is in need of care and support*

### 1.1.2 Definition: Regulated Activity

Regulated Activity for adults at risk **does not include** activities which would ordinarily be associated with sport (i.e. coaching is not regulated activity for adults at risk), with the exception of conveying an adults at risk. Definition of regulated activity for adults at risk is no longer linked to the environment in which the activity takes place, nor the frequency with which it occurs. Therefore driving an adult at risk to a competition once **will** constitute regulated activity.

***A disabled person is not necessarily an adult at risk, and an adult at risk may not have impairment.***

Given the enhanced risk of abuse for adults at risk DSW consider it essential that all those associated with the organisation are provided with the guidance and support which will give them the confidence and skills to respond appropriately to suspicions, or disclosures of abuse, and in order to ensure that their engagement within (disability) sport always reflects good, safe practice.

### 1.1.3 Definition: Capacity

Capacity relates to the ability of an individual to make a decision at a particular time. Under the Mental Capacity Act 2005 an individual may be considered to 'lack capacity' if they cannot:

- Understand information given to them to make a particular decision<sup>1</sup>
- Retain that information long enough to make the decision
- Use or weigh up the information to make the decision
- Communicate their decision<sup>2</sup>

... and that this might be as a consequence of illness or impairment (such as mental health problem, dementia or learning disability (intellectual impairment)).

The law focuses on the principle that everyone has capacity to make a decision if given sufficient support, time, and information; and will not treat individuals as 'lacking capacity' just because a decision appears to be unwise or ill-judged.

Whilst it is important to have an appreciation of capacity in order to appropriately support adults at risk it **WILL NOT** be your role to make a decision about whether an adult 'lacks capacity' or not. DSW encourages all staff and volunteers to:

- assume that all adults at risk have capacity, and therefore the ability to make decisions;
- support communication in such a way that the adult at risk can understand information being given, and be understood when giving information back;
- treat decisions made by an adults at risk with respect, even if it is felt that a decision is unwise; and
- work with the adult at risk and their advocates (and Independent Mental Capacity Advocate (IMCA) if relevant) to ensure that they are appropriately supported, and capacity continues to be effectively assessed.

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<sup>1</sup> An individual cannot be considered to 'lack capacity' if the information they need in order to make a decision has been given in a way which is not accessible or understandable to them

<sup>2</sup> An individual cannot be considered to 'lack capacity' because others around them cannot modify their communication method in order to understand that individual when s/he communicates

DSW's adhere to the following key principles which link to safeguarding:

- the welfare of the (disabled) person is paramount
- inclusion should occur through the provision of *meaningful* activity, through a process of collaborative decision-making which involved the (disabled) child or young person, their parents, guardians, carers, or personal assistants, and coaching or voluntary staff
- *appropriate* communication<sup>3</sup> is essential in order to ensure that everyone is equipped to deal with safeguarding issues or to safeguard themselves from harm
- Disabled people will be treated as people first – an individual's impairment will not mask or deter appropriate enquiry
- all reasonable steps will be taken to protect adults at risk from harm, discrimination and degrading treatment and to respect their rights, wishes and feelings
- all suspicions and allegations of poor practice or abuse will be taken seriously and responded to swiftly and appropriately
- establish partnership working with all appropriate agencies and individuals to ensure that the best outcome is achieved
- training is essential in order to raise the awareness of those working within sport, those participating in sport, and those supporting individuals' involvement in sport (e.g. parents/guardians, carers, etc). DSW therefore support all individuals, organisations and clubs who are members or affiliate to our organisation to attend appropriate Safeguard and Protection training
- DSW has comprehensive insurance protecting its participants, coaches and staff. DSW expects all affiliated members to have an acceptable 'live' insurance policy in force at all times.

**All DSW staff, paid or unpaid, are expected to uphold the principles and actions of this Adults at Risk Welfare and Safeguarding Policy at all times, and will be asked to formally commit to this agreement.**

**Access to a copy of the policy should be possible at all times; the policy is available via the DSW website at:**

**[www.disabilitysportwales.com](http://www.disabilitysportwales.com)**

*DSW will internally review its Welfare and Safeguarding Toolkits on an annual basis (or whenever there are amendments to relevant legislation or to best practice); and will externally review, in conjunction with appropriate partners, every 3 years.*

*The review process will be led by the DSW Lead Welfare Officer, and supported by the DSW Associate Lead Welfare Officer, the Board Welfare Champion and members of the Case Management Panel where required.*

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<sup>3</sup> It may be that disabled children, young people or adults have specific communication needs; DSW will therefore provide all Welfare Policies in alternative and accessible format.

## 1.2. Policy Aims

The aim of the policy is to keep adults at risk safe, consistently ensure their welfare, and protect their right to a positive physical activity (including sport) environment, which is free from abuse. This will be ensured through:

- consistent engagement in good practice (Section 2: DSW Guidance to Good Practice)
- taking the time to understand what the needs of all adults at risk are whilst in the care of DSW. (Section 3: Understanding Adults at Risk Welfare and Safeguarding Issues)
- supporting staff and volunteers to make informed and confident responses to specific safeguarding issues (Section 4: Reacting to Adults at Risk Welfare and Safeguarding Issues)
- safe and rigorous recruitment processes for all paid and voluntary personnel working for or on behalf of DSW (Section 5: Safe Recruitment Processes)
- an equitable approach emphasising everyone's right to participate and compete in (disability) sport free from the threat of abuse regardless of their impairment, age, sex, gender, culture, language, racial origin, religious belief or sexual orientation
- a knowledge of the right people to contact at the right time (Section 6: Important Contacts)

## 1.3. Legal and Procedural Framework surrounding Child Welfare and Safeguarding

The practices and procedures within this policy are based on principles contained within UK and International legislation and Government guidance.

- Human Rights Act 1998
- The Data Protection Act 1998
- Public Interest Disclosure Act 1998
- Speaking Up for Justice 1998
- Youth Justice and Criminal Evidence Act 1999
- No Secrets 2000
- In Safe Hands 2000
- Care Standards Act 2000
- Domestic Violence Crime and Victims Act 2004
- Mental Capacity Act 2005
- Care and Support Bill 2012
- Law Commission Report on Adult Social Care 2011
- Caring for our Future: Reforming Care and Support 2012
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- The Equality Act 2010

## 1.4. Table of Appendices relevant to Section 1

Appendix	Title	Description
A1.1	<a href="#">Template Policy Statement</a>	A template for clubs and organisations affiliated to Disability Sport Wales to use in creating a Adults at Risk Welfare and Safeguarding Policy

# Section 2:

## DSW Guidance to Good Practice

### 2.1. Introduction

In order to provide adults at risk with the best possible experiences and opportunities in (disability) sport everyone must operate within accepted ethical frameworks, as identified in Codes of Conduct (see Appendix A2.1, A2.2 and A2.3), Guidance documents, policy and legislation.

*It is not always easy to distinguish poor practice from abuse. It is therefore **NEVER** the responsibility of employees, volunteers or participants in (disability) sport to make judgements about whether or not abuse is taking place. It is however their responsibility to identify poor practice and possible abuse and act if they have concerns about the welfare of the adult at risk. This is further explained in Sections 3 and 4.*

This section will help to identify what DSW and the wider Sport Sector mean by good and poor practice.

### 2.2 Ensuring Good Practice

Disability Sport Wales expect that all those involved with delivering (disability) sport to engage in good practice. DSW will ensure that there is access to appropriate training and support, so as to keep its coaches, volunteers, and other staff (whether involved with regulated activity or not) aware of current issues and process concerned with the welfare and safeguarding of adults at risk.

In order to reinforce good practice, the following will be required:

- All coaches, volunteers and other staff working for, or on behalf of, Disability Sport Wales (whether paid or unpaid) should adhere, and will be asked to sign up to the relevant DSW Code of Conduct (see Appendix A2.1 (Coaches and Volunteers), A2.2 (Athlete) or A2.3 (Parent/Guardian))
- All DSW clubs should have an up-to-date Welfare and Safeguarding Policy, and a commitment to amending it on a regular and frequent basis
- Only clubs which have completed insport Club Ribbon standard will be promoted by DSW through their communication (website, recommendation, etc) (see Appendix A2.4)
- Safe and rigorous recruitment processes are to be followed so as to ensure that personnel are appointed who pose no risk to children, young people or adults at risk (see Section 5)
- All coaches, other volunteers, DSW member body staff, and core DSW staff who are involved with Regulated Activity, or occupy roles which DSW identify as eligible, with adults at risk are required to undertake a Disclosure and Barring Service (DBS) check through DSW. This information should be made available to DSW on a 3 yearly basis, or if an individual's role changes. In such instances it may be that an Enhanced Check is requested (see Section 3)
- An open and transparent process is in place to enable the reporting of concerns, provide an avenue to voice concerns, enable whistle-blowing, and ensure clear information is given in the right format to all participants, parents and carers at all times
- Risk management processes must be adhered to when planning, delivering and reviewing sessions, activities and events (see Section 4)

- Disciplinary, Complaints and Appeals procedures must be clearly articulated to all individuals involved with DSW, whether as a volunteer or paid member of 'staff', or as an athlete (see Section 4).

### 2.3 Poor Practice

The following are regarded as poor practice and **should not be** engaged in by any DSW personnel:

- unnecessarily spending excessive amounts of time alone with an adult at risk away from others
- taking adults at risk to your home, particularly if this means they will be alone with you
- engaging in rough, physical or sexually provocative games, including horseplay
- allow or engaging in inappropriate touching of any form
- making sexually suggestive comments to an adult at risk,
- reducing an adults at risk to tears as a form of control
- allow allegations made by an adult at risk to go unacknowledged, unrecorded or not acted upon
- not taking an allegation made by an adult at risk seriously, and dismissing it for reasons you consider to be linked to their impairment
- not following DSW guidelines around the use of social media, information technology and e-safety (see Appendix A2.5), or refusing to sign up to the DSW Coaches, or Athlete's, agreement for the use of social media (see Appendix A2.6 or A2.7)

If during your care you accidentally hurt an adults at risk, they seems distressed in any manner, appears to be sexually aroused by your actions and/or if they misunderstand or misinterpret something you have done, report such incidents as soon as possible to another colleague and make a written record of it to pass on to a senior member of staff/volunteer.

### 2.4 Physical Contact with Adults at Risk in Sport

Many sports, by their nature, require a degree of physical contact. Physical contact can be used *appropriately* to instruct, encourage, protect or comfort. The aims of guidelines relating to physical contact are to provide guidance about appropriate types and contexts.

Physical contact should only be used when the aim is to:

- develop sports skills or techniques
- treat an injury
- prevent an injury
- meet the requirements of the particular sport
- comfort a person who is upset
- guide or support the person in pursuit of their sport
- support or assist a person to stand or regain their balance, or to transfer into specific equipment used within the pursuit of their sport

all of the above forms of contact should

- only occur within an open environment,
- meet the need of the person receiving the guidance (and **NOT** the need of the person giving the guidance)
- be fully explained to the person

- only occur with permission from the individual (with the exception of in an emergency)
- only be given if the individual has received specific training to do so

Contact should **NEVER**

- be prolonged, unnecessary or frequent
- involve touching or contact with genital areas, breasts or buttocks
- take place in secret or out of sight of others
- include the transfer of a person, unless the individual providing the transfer has received appropriate training or is related to the individual

Information about injuries occurring within the DSW/sport/club environment should be fully recorded. If an adult at risk arrives at the session with a pre-existing injury then this should also be recorded and mentioned to the parents/carers/guardians on collection or as appropriate.

**1.1. List of Appendices relevant to Section 2**

Appendix	Title	Description
A2.1	<a href="#">Coaches Code of Conduct</a>	Outline of the ethical framework which a DSW Coach agree to abide by
A2.2	<a href="#">Athletes Code of Conduct</a>	Outline of the ethical framework which a DSW Athlete agrees to abide by
A2.3	<a href="#">Parents/Carers/Guardians Code of Conduct</a>	Outline of the ethical framework which a Parent/Carer/Guardian of a DSW athlete agrees to abide by
A2.4	<a href="#">Guidelines for Club Promotion through the DSW website</a>	DSW recommendations for good practice when promoting clubs for children and young people on the DSW website
A2.5	<a href="#">DSW's Commitment to e-safety: Using Social Media and Information Technology</a>	DSW position statement regarding e-safety and the role e-communication has within the organisation
A2.6	<a href="#">Athlete Agreement: Use of Social Media</a>	Agreement Form for DSW athletes to sign agreeing to standards for the use of social media
A2.7	<a href="#">Officers Agreement: Use of Social Media</a>	Agreement Form for DSW Officers (coaches, volunteers or others in a position of trust) to sign agreeing to standards for the use of social media



## Section 3:

# Understanding Adults at Risk Welfare and Safeguarding Issues

### 3.1. Defining Abuse

Abuse is any form of physical, emotional or sexual maltreatment or lack of care that leads to harm or fails to protect an adult at risk from harm. It is more likely to occur where there is a relationship of trust (which may pre-exist the abuse, or have been created in order for abuse to take place, i.e. grooming) or responsibility. Abuse can happen to an adult at risk regardless of their age, sex, gender, sexuality, race or impairment; and may be perpetrated by males or females.

There are a number of categories of abuse relevant to adults at risk:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Financial or material abuse
- Institutional abuse
- Neglect and acts of omission, and
- Discriminatory abuse

The abuser may be a family member, someone the adults at risk encounters in residential care or in the community, a friend, a coach, or a stranger. Any individual might abuse an adult at risk directly, or may be responsible for abuse because they fail to prevent another person harming the adult at risk.

Adults at risk might experience greater risk factors linked to abuse because:

- The individual needs support with personal care (certain personal care needs may present more opportunity for abuse)
- They are dependent on another individual to do day-to-day things
- They are depended on by someone else
- There may have been a change in lifestyle which has resulted in unemployment, employment, or illness
- They are emotionally or socially isolated
- there is an absence of local support networks
- there is alcohol/substance misuse present (either by the adult at risk or someone else around them)
- they are financially dependent on another individual
- of communication, and speech and language differences

Research suggests<sup>4</sup> that adults at risk who experience financial abuse are highly likely to also experience other types of abuse (i.e. physical, sexual or emotional)

It is not always easy to distinguish poor practice from abuse. It is therefore **NEVER** the responsibility of employees, volunteers or participants in (disability) sport to make judgements about whether or not abuse is taking place.

It is however their responsibility to identify poor practice and possible abuse and act if they have concerns about an individual's welfare.

### 3.2 Types of Abuse

Abuse may take place in a sport context (and be perpetrated by someone who has a role within (disability) sport), or it may be noticed within a sport context but have been perpetrated outside of the sport environment by someone who is known or unknown to the adult at risk. Any of the types of abuse referred to below may be perpetrated deliberately, through negligence or ignorance.

It is important to remember that an individual who commits abuse may be from ANY background, belong to any black or minority ethnic group, be lesbian, gay or bisexual, be transperson (transsexual or transgender), have impairment, be male or female, and be any age, or from any religious or faith group. **AND they could be your friend.**

According to *No Secrets*<sup>5</sup> abuse is “a violation of an individual's human and civil rights by any other person or persons” (p9). Abuse may be a single or repeated act, and it may fall into one of the below-identified 7 categories:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect and acts of omission
- Financial or material abuse
- Discriminatory abuse
- Institutional abuse

Although Bullying is not identified as an explicit form of abuse within *No Secrets*, DSW identify that bullying is something which may be more frequently experienced by adults at risk, and therefore have an Anti Bullying Policy (see Appendix A3.1) to ensure that bullying is not tolerated and does not persist.

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<sup>4</sup> Wilson, B., Burns, S. and Brown, H. (2003). Links between the Public Guardianship Office and social services departments. **Journal of Adult Protection**. 5 (2), pp 38–46.

<sup>5</sup> DoH (2000). **No Secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse**. DoH: London

### 3.2.1 Physical Abuse:

This includes:

*“...hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions”<sup>3</sup>*

In a sports situation, physical abuse towards an adult at risk would include hitting an individual because they hadn't done what they were asked; or a volunteer disregarding the physical needs of an adult at risk when putting together a training session, and getting them to do activities which in type, frequency, or duration caused them harm or injury.

### 3.2.2 Sexual Abuse

*“Including rape and sexual assault or sexual acts to which the vulnerable adult (sic) has not consented, or could not consent, or was pressured into consenting”<sup>3</sup>*

Within a sporting context this could be a coach insisting that s/he sleeps with the adult at risk when away with the team and forcing that individual without consent to perform sexual acts; or it might be that a volunteer touches an adult at risk, in order to gain sexual gratification, under the pretence that they are providing kinaesthetic feedback.

It should be noted that researchers suggest that some adults at risk (particularly those who have an intellectual impairment, or those who are Deaf, may be at a greater risk of sexual abuse than other adults at risk, because there is a greater acceptance of touch as a means of communication so it therefore goes unnoticed and/or un-reported).

### 3.2.3 Emotional Abuse:

This involves:

*“... threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks”<sup>3</sup>*

Emotional abuse in sport may occur when the adult at risk is constantly criticised, given negative feedback, or expected to perform at levels that are above their capability; or it could be that a volunteer, parent or carer threatens to leave the adult at risk to get home on their own if they do not win.

### 3.2.4 Neglect and Acts of Omission

This involves:

*“ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating”<sup>3</sup>*

Within a sport context neglect/acts of omission might include not allowing an adult at risk appropriate time-outs of training sessions for drinks breaks; it would also include a coach leaving an adult at risk inappropriately unsupervised, or failing to give them the support required to take medication, or to eat.

### 3.2.5 Financial or Material Abuse

This involves:

*“... theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits”<sup>3</sup>*

Examples of how this could exist within sport include asking adults at risk for additional costs which are suggested to be associated with the coaching session, but are pocketed by the coach/administrator; being asked to support the adult at risk with their money whilst away at a competition and then logging spend where there has been none, and failing to return residual monies to the adult at risk.

### 3.2.6 Discriminatory Abuse

This involves:

*“... racist, sexist, that based on a person’s disability [sic], and other forms of harassment, slurs or similar treatment”<sup>3</sup>*

Within sporting context examples of this would be shouting at a player from off the field of play and referring to that individual’s race, sex or impairment (i.e. “come on ... stop playing like a girl”), or allowing another player to use similar language within training or match play.

### 3.2.7 Institutional Abuse

This would be something which might be identified within the sporting environment, but is not a form of abuse which would be committed by someone working within a sports context. It refers to the isolated or persistent and frequent ill treatment, poor or unsatisfactory professional practice, or gross misconduct, perpetrated by an individual or number of individuals within environments where an adult at risk would receive professional ‘care’.

It is important that in people who work within sport are aware of this form of abuse so that they can safeguard adults at risk if there is a suspicion of such abuse taking place within the individual’s life.

## 3.3 Indicators of Abuse

Even for those experienced in working with abuse cases relating to adults at risk, it is not always easy to recognise a situation where abuse may occur or has already taken place. Most people are not experts in such recognition, but indications that an adult at risk is being abused may include one or more of the following:

- unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries, or with unusual patterning
- an injury for which an explanation seems inconsistent
- the adult at risk describes what appears to be an abusive act involving them
- another individual expresses concern about the welfare of an adult at risk
- unexplained changes in the adult at risk’s behaviour, e.g. becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper
- inappropriate sexual awareness
- engaging in sexually explicit behaviour
- distrust of other individuals, particularly those whom a close relationship would normally be expected
- difficulty in making friends
- being prevented from socialising with others

- displaying variations in eating patterns including over-eating or loss of appetite
- losing weight for no apparent reason
- becoming increasingly dirty or unkempt
- specific equipment supplied to support the adult at risk (wheelchair, callipers, walking frame) is ill-fitting or damaged and remains so
- forced immobility brought about through specific actions of another individual i.e. removing batteries from an electric wheelchair to restrict liberty and movement
- money goes missing or is never available

It must be recognised that the above list is not exhaustive, but also that the presence of one or more of the indications is not an absolute indication that abuse is taking place. It is **NOT** the responsibility of those working in or on behalf of DSW to decide whether or not abuse is occurring – but it **IS** their responsibility to act, and pass on any concerns.

### 3.4 List of Appendices relevant to Section 3

Appendix	Title	Description
A3.1	<a href="#">DSW Anti Bullying Policy</a>	DSW Policy to combat and prevent bullying

## Section 4:

# Reacting to Adults at Risk Welfare and Safeguarding Issues

### 4.1 Introduction

It is not the responsibility of anyone working in or on behalf of DSW, whether in a paid or unpaid capacity, to decide whether or not abuse of an adult at risk has taken place. However **there is a responsibility to act, and pass on any concerns through contact with the appropriate authorities** so that they can then make inquiries and take necessary action to protect the individual and bring any criminal offence proceedings. This applies **BOTH** to allegations/suspicions that abuse taking place outside of sport (see Appendix A4.1) and to allegations/suspicions of abuse occurring within sport (see Appendix A4.2)

This section explains DSW's process for responding to concerns or allegations about the abuse of adults at risk.

### 4.2 Responding to concerns/allegations

Employees and volunteers may become aware of possible abuse in various ways. It may be seen happening, it may be suspected because of signs observed (such as those listed in Section 3.3), it may be reported by someone else, or directly confirmed by the adult at risk affected.

In the last of these cases, it is particularly important to respond appropriately. If an adult at risk says or indicates that they are being abused, you should:

- **stay calm** so as not to frighten the individual
- **reassure** them that they are not to blame and that it was right to tell
- **actively listen**<sup>6</sup> showing that you are taking them seriously
- **keep questions to a minimum** so that there is a clear and accurate understanding of what has been said. Only ask questions to clarify
- **inform** the adult at risk that you HAVE to let other people about what they have told you, reassure them that this is to help stop the abuse continuing.
- **safety of the individual** is paramount. If the adult at risk needs urgent medical attention call an ambulance, inform the doctors of the concern and ensure they are made aware that this is potentially linked to abuse. If there is an immediate risk to the adult, then call the police
- **record** all information using the **Adult Protection Referral Form** (see Appendix A4.3)
- **report** the incident to the DSW Lead Welfare Officer, the Club Welfare Officer, or directly to the Adults Social Care team in your Local Authority if necessary (see Section 6)

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<sup>6</sup> 'Actively Listening' does not just mean using ears to hear spoken word – it means finding a way to enable the individual to communicate, and you demonstrating that you value and are going to do something with the information they give.

### 4.3 Recording Information

In Wales the safeguarding and protection of adults at risk is made by directly reporting the suspicion or allegation of abuse to a Statutory Organisation (Social Services, Health or the Police). This is referred to as a 'referral' and can be made by a member of the public, concerned staff, and voluntary organisations (as well as others). This referral is made using an **Adult Protection Referral Form**. Please use this form to record all information about the suspicion or allegation of abuse (Appendix A4.3).

In recording information you should confine yourself to the facts, if you have additional information you need to distinguish this and identify that as personal knowledge and hearsay. Do not include your own opinions.

If you have witnessed or been informed of an incident which is considered to be poor practice or a breach of the Code of Conduct for that role, then complete the **Poor Practice Referral Form** (see Appendix A4.4). This form should be returned to the DSW Lead Welfare Officer.

### 4.4 Reporting the Concern

All suspicions and allegations **MUST** be reported appropriately. It is recognised that strong emotions can be present when dealing with issues linked to abuse. It is important to understand these feelings but not allow them to interfere with your judgement about any action to take. Your primary role is to pass information about the allegation, observation or disclosure on.

Your only loyalty is to the individual who may be being abused.

The DSW expects its members, volunteers and staff to discuss any concerns they may have about the welfare of an adult at risk immediately with the person in charge, or the DSW Lead Welfare Officer, and subsequently to check that appropriate action has been taken. The process for reporting concern of abuse for an adult at risk is different to that for children. All concerns should be passed immediately on to the Adult Care Services team within your LA, or to the DSW Lead Welfare Officer, who will pass those concerns on on your behalf.

Where there is a complaint against an employee or volunteer, there may be three types of investigation.

- **Criminal** in which case the police are immediately involved
- **Adult protection** in which case the social services (and possibly) the police will be involved
- **Disciplinary or misconduct** in which case DSW will be involved. For further information about these processes see Appendix A4.5 or A4.6 (depending on role)

**If you have ANY doubt - report it**  
**If you receive a disclosure – report it**

**It may be just one of a series of other incidences know to those involved with child protection**

The process for reporting any allegation or concern that an adult at risk has been abused by a DSW member of staff or volunteer can be found in Appendix A4.2. The sequence of action DSW will follow in dealing with that information is illustrated in Appendix A4.7.

Where an allegation or concern has been identified within a DSW session that an adult at risk has been abused by an individual **outside** of DSW, the process is identified in Appendix A4.1. The sequence of action DSW will follow in dealing with that information is illustrated in Appendix A4.9.

Allegations of abuse are sometimes made some time after the event. Where such an allegation is made, you should follow the same procedures as for an adult protection concern happening now.

For further information on a local level about the protection of adults at risk please follow the link to the Forum which caters for your Local Authority, as identified below:

Forum	Local Authorities	Contact
North Wales Forum	Ynys Mon, Gwynedd, Conwy, Denbighshire, Flintshire and Wrexham	<a href="http://www.ssiacymru.org.uk/home.php?page_id=1141">www.ssiacymru.org.uk/home.php?page_id=1141</a>
Dyfed Powys Forum	Carmarthen, Ceredigion, Pembroke and Powys	<a href="http://www.ssiacymru.org.uk/home.php?page_id=1140">www.ssiacymru.org.uk/home.php?page_id=1140</a>
South Wales Forum	Bridgend, Cardiff, Swansea, Vale of Glamorgan, Rhondda Cynon Taff, Merthyr and Neath and Port Talbot	<a href="http://www.ssiacymru.org.uk/home.php?page_id=1139">www.ssiacymru.org.uk/home.php?page_id=1139</a>
South East Wales/Gwent wide Adult Safeguarding Board	Caerphilly, Blaenau Gwent, Monmouth, Newport and Torfaen	<a href="http://www.ssiacymru.org.uk/home.php?page_id=1137">www.ssiacymru.org.uk/home.php?page_id=1137</a>

For general information regarding Adult Protection Procedures see [www.ssiacymru.org.uk/home.php?page\\_id=8297](http://www.ssiacymru.org.uk/home.php?page_id=8297)

#### 4.5 Whistle Blowing/Provision of Information relating to ‘colleagues’

DSW have a procedure which enables staff and volunteers to share, in confidence with a designated person, concerns they may have about a colleague’s behaviour (see Appendix A4.10).

This may be behaviour linked to the abuse of adults at risk or behaviour that pushes boundaries beyond acceptable limits. If this is consistently ignored a culture may develop within an organisation whereby staff adults and young people are ‘silenced’. DSW is fully supportive of Whistle Blowing/Provision of information relating to ‘colleagues’ for the sake of an individual’s safety, and will provide support and protect the identity of the individual/s who ‘whistle blow’.

Whilst it is difficult to express concerns about colleagues, it is important that these concerns are communicated to the designated person. All staff and volunteers will be encouraged to talk to the DSW Lead Welfare Officer if they become aware of anything that makes them feel uncomfortable.



#### **4.6 Concerns outside the immediate Sporting Environment (e.g. a parent or carer)**

It is vital that any concerns regarding adults at risk are passed on to agencies who can effectively intervene and assist. Therefore even if the concerns/allegations relate to a situation outside of the immediate sporting environment, report your concerns to the DSW Lead Welfare Officer (see Appendix A4.1). If the DSW Lead Welfare Officer is not available, the person being told or observing the potential abuse should contact the DSW Associate Lead Welfare Officer, their local social services department or the police immediately. The DSW Lead or Associate Welfare Officer (whichever individual receives the referral) will complete a DSW Lead Welfare Officer Referral Form which will record all information received, and action taken regarding the case.

The DSW Lead Welfare Officer will inform the DSW Internal Independent Verifier, who will convene the DSW Case Management Panel, and report the issue to them. The DSW Case Management Panel will determine whether or not the person/s involved in the incident plays a role in the organisation and act accordingly (see Appendix A4.11). The DSW Lead or Associate Welfare Officer will submit all information to the DSW Internal Independent Verifier regarding the case, and will complete a DSW Safeguarding Panel Referral Form (see Appendix A4.13).

#### **4.7 Concerns about e-safety**

If you have concerns about the safety of an adult at risk because of their use of social media or information technology, or you believe that a DSW member is using social media or information technology inappropriately then complete the e-safety Incident Report Form (Appendix A4.15), and follow the processes identified in Appendix A4.16.

#### **4.8 Confidentiality**

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only. This includes the following people:

- The DSW Lead Welfare Officer, or Associate Lead Welfare Officer
- The person making the allegation
- Adult Care Services and/or Social Services
- The Police (if involved)
- The alleged abuser (and parents if appropriate)

**Seek Adult or Social Services advice on who should approach the alleged abuser.**

All information is stored in a secure place, a locked filing cabinet or a password protected electronic area, with access limited to designated people, in line with data protection laws (see Appendix A4.12 for guidance about how DSW store any Welfare case or referral information).

#### **4.9 Internal Inquiries and Suspension (see Appendix A4.5 (DSW employee) OR Appendix A4.6 (DSW Athlete))**

The DSW Lead Welfare Officer in conjunction with the DSW Associate Lead Welfare Officer and the Internal Independent Verifier will make an immediate decision about whether the individual about whom the concern was raised or the referral or disclosure identified should be temporarily suspended pending further inquiries.

#### **4.10 Working with the Aftermath**

After a concern or allegation about an adult protection issue has been investigated, there is likely to be strong feelings amongst staff, parents individuals in the wider community, which will need to be addressed.

There are likely to be issues of:

- Communication - if rumour or fact
- Guilt and blame - if suspicions had been around for some time
- Impact - on individuals, or the nature of what occurred and to whom
- Gaps in the organisation in terms of roles and post held – if suspension or dismissal has occurred

Careful thought will need to be given to the sharing of information and the provision of appropriate support.

##### *4.10.1 Supporting the Club*

Staff at DSW understands the impact a suspicion or allegation about an adult at risk's protection concern may have on a club/organisation. DSW will support the club/organisation during the aftermath by:

- Allocating an individual within DSW who will act as a point of contact for the club/organisation
- DSW will make every effort to work with the club/organisation to ensure that the regular activities of the club/organisation experience as little disruption as possible
- Should it be required, DSW will support the club/organisation in providing as much information on the allegation or suspicion as is appropriate and relevant, this may include information session for parents/carers/other club members
- DSW would support the club/organisation with any enquiries from external organisations/agencies in relation to the (alleged) 'incident'
- DSW will give consideration to any request for information from a club/organisation in relation to the (alleged) 'incident'

##### *4.10.2 Managing the Media*

Any media enquiries either related directly or indirectly to an incident involving an adult at risk will automatically be referred to the Executive Director who will, in conjunction with the DSW Board of Directors, determine whether a response should be made and if so, what information should be released.

#### **4.11 Monitoring incidences and complaints**

Once an incident has been reported, or a complaint has been received, the treatment of these will be monitored, recorded and evaluated in order to ensure that all incidents/complaints are dealt with, that best practice takes place, and that the DSW Welfare and Safeguarding Policies and Processes continue to be fit-for-purpose and reflective of the (disability) sport landscape in Wales. This monitoring process is identified in Appendix A4.8.

#### 4.12 List of Appendices relevant to Section 4

Appendix	Title	Description
A4.1	<a href="#">Responding to concerns or allegations of abuse towards an adult at risk</a>	DSW process which MUST be followed if there are concerns that some OUTSIDE of DSW has abused or has been alleged to abuse a child or young person attending a DSW session
A4.2	<a href="#">Responding to concerns about a DSW staff member or volunteer towards an adult at risk</a>	DSW process which MUST be followed if there are concerns that a DSW member of staff or volunteer has abused or has been alleged to abuse a child or young person
A4.3	<a href="#">Adult Protection Referral Form</a>	Template form which outlines the key elements of information which should be provided or captured by an individual receiving a referral
A4.4	<a href="#">Poor Practice Referral Form</a>	Template form which outlines the key elements of information which needs to be identified if there is a suspicion or report of poor practice within the coaching environment or session
A4.5	<a href="#">DSW Welfare Discipline and Dispute Resolution Procedure (DSW Employee)</a>	Discipline and dispute resolution policy for those employed or deployed by DSW
A4.6	<a href="#">DSW Welfare Discipline and Dispute Resolution Procedure (Athlete)</a>	Discipline and dispute resolution policy for athletes
A4.7	<a href="#">DSW Internal Safeguarding Procedures - Responding to an allegation made about a DSW Coach or Volunteer</a>	The process DSW will apply in responding to an allegation received through the DSW Lead Welfare Officer about a coach or volunteer involved with a DSW session.
A4.8	<a href="#">DSW Incidents and Complaints Monitoring Process</a>	DSW process for monitoring incidents and complaints
A4.9	<a href="#">DSW Internal Safeguarding Procedures Responding to an allegation made about someone outside DSW</a>	The process DSW will apply in responding to an allegation received through the DSW Lead Welfare Officer about a individual who is not associated with a DSW session.
A4.10	<a href="#">DSW Whistleblowing Policy</a>	DSW Whistle Blowing Policy which can be evoked if an individual believes that a member of DSW staff is behaving inappropriately
A4.11	<a href="#">DSW Risk and Case Management Process (Adults at Risk)</a>	DSW process highlighting training requirement through to responding to an issue raised within the DBS check
A4.12	<a href="#">Guidance for storing welfare case or referral information</a>	Information for Lead Welfare Officer regarding the processes for storing information which links to a Welfare case or referral, in accordance with Data Protection legislation.
A4.13	<a href="#">DSW Safeguarding Panel Referral Form</a>	Template form to be completed by the DSW LWO or the Safeguarding Panel which records the key points of the DSW Safeguarding Panel discussion and identifies the chain of communication on to appropriate individuals or bodies.

<b>Appendix</b>	<b>Title</b>	<b>Description</b>
A4.15	<a href="#"><u>e-safety Incident Report Form</u></a>	Template form which outlines the key elements of information which should be captured if there is an incident, or poor practice linked to e-technology or social media
A4.16	<a href="#"><u>Responding to concerns about an e-safety incident</u></a>	DSW process which MUST be followed if there are concerns about an e-safety incident

# Section 5:

## Safe Recruitment Processes

### 5.1 Introduction

It is important that all reasonable steps are taken to prevent unsuitable people from working with adults at risk. The Government policy is clear, through legislation and statutory guidance that safeguarding for adults at risk is more likely to be achieved if there is empowerment, protection and prevention. Non-statutory agencies have a role to play in ensuring the aforementioned elements are included into safeguarding processes, to which safe recruitment practices are essential. Whilst sport is not currently included within regulated activity (see Appendix A5.14), DSW consider it to be an environment which could potentially expose adults at risk to a greater degree of vulnerability, unless safeguards are acknowledged and incorporated. DSW have identified roles which it identifies as being eligible for a DBS check (see Appendix A5.11). It is important to note that DSW use the Disclosure and Barring Services check as a part of safe recruitment processes NOT as a standalone method. Further information about the DBS can be found in Appendix A5.12.

DSW have a detailed and coherent Recruitment Policy (see Appendix A5.1). The information included in this section summarises the key points of the Recruitment Policy.

To ensure DSW only recruit suitable people into their roles, the following steps are taken when recruiting:

- All staff (paid or unpaid) will be recruited into DSW roles and posts are appointed based on their suitability against a predefined Role Description (see Appendix A5.5a, A5.5b, A5.6, A5.7, A5.8, and/or A5.9)
- All staff and volunteers should complete a Self Disclosure Form (Adults at Risk) (see Appendix A5.10)
- All staff and volunteers should complete an application form (see Appendix A5.3).
- Two confidential references will be taken up from previous employers (see Appendix A5.4). If the potential employee has previously worked with adults at risk then they should enclose a reference from this organisation. These references **WILL** be taken up and confirmed through telephone contact from the referee.

Evidence of identity (passport or driving licence with photo) which will be seen when the DBS disclosure form is completed (if relevant) or during induction into the role. DSW have a formal DBS process which is identified in Appendix A5.13.

### 5.2. Interview and Induction

All employees and volunteers will be required to undertake an interview carried out to acceptable protocol and recommendations. All employees and volunteers will receive a formal staff induction during which:

- A check is made that the applicants details provided on the application form are corrected and were completed in full (including self-disclosures (see Appendix A5.10))
- The applicant will be asked for certification of all qualifications referred to on their application form and/or within the interview. In circumstances where certification is not available, these qualifications and awards will be ratified with the awarding body.
- The role requirements and responsibilities are clarified, and role description revisited
- The applicant will commit to complying with DSW standards for behaviour, ethics and standards

identified within the Staff Handbook which will be discussed in full

- Welfare procedures are explained and training needs identified, i.e. child welfare training, protection of adults at risk training, etc.
- A DBS application form will be completed if the applicant is going to be employed into a role which DSW has identified as being eligible for receipt of a check or if the role includes regulated activity
- DSW apply a **six month** probationary period to all new appointments. Progress and performance against the essential characteristics of the role (as identified in the personal specifications) will determine whether the probation period is extended, or whether the probationary period is confirmed and the member of staff made permanent.
- All applicants will be asked to sign the DSW Code of Conduct associated with their role

### **5.3. Training**

In addition to pre-selection checks, the safeguarding process includes training after recruitment to help staff and volunteers to:

- Analyse their own practice against what is deemed best practice, and to ensure their practice is likely to protect them from false allegations
- Recognise their responsibilities and report any concerns about suspected poor practice and/or abuse
- Respond to concerns expressed by a child/young person or adults at risk
- Work safely and effectively with children/young people or adults at risk

DSW requires:

- **All** staff and volunteers who occupy roles within regulated activity to apply for an enhanced DBS check (these roles are identified within Appendix A5.11)
- All employees, volunteers, coaches, welfare officers and team managers to undertake relevant training or undertake a form of home study, to ensure their practice is exemplary and to facilitate the development of positive culture towards best practice and the welfare and safeguarding of child/young person and adults at risk
- All staff and volunteers to receive advisory information outlining best/poor practice and informing them what to do if they have concerns about the behaviour of an adult towards a child/young person or adult at risk
- All coaches, trainee coaches and leaders should have an up-to-date first aid qualification, and would be strongly encouraged to attend welfare and safeguarding training

### **5.4. Implementation and Monitoring**

It is mandatory that all staff, coaches and volunteers receive training on the DSW Welfare Policies (Adults at Risk and Children). A copy of these policies will be made available to all staff, coaches and volunteers, and is available under the Welfare Toolkit section of the DSW website. The Adults at Risk Welfare and Safeguarding Policy will be reviewed annually by the DSW Lead Welfare Officer, in conjunction with the DSW Associate Lead Welfare Officer, the Board Welfare Champion, and members of the Case Management Panel (as appropriate), and will be signed off by the Board of Directors and made available to Sport Wales, and colleagues working around the safeguarding of adults at risk. The DSW Lead Welfare Officer will report to the DSW Board Welfare Champion prior to each DSW Board meeting.

#### **5.4.1. Monitoring of DSW and DSW Website Content**

DSW recognises that as an organisation working with other partners clubs, agencies, and organisations (who may not be affiliated to DSW), and in some cases advertises the availability of clubs and sporting opportunities for disabled people through its website on behalf of other organisations, it has a

responsibility to attempt to ensure that such clubs meet minimum Adults at Risk Welfare and Safeguarding standards. Therefore each club, organisation or sporting opportunity that is ‘advertised’ on the DSW websites will need to have received the insport Club Ribbon standard. This identifies that the club have attained robust, safe and inclusive minimum operating standards, and therefore DSW have increased confidence that (disabled) people will gain a positive sporting experience.

**5.4.2. Monitoring of DSW recruitment processes**

All recruitment processes will be monitored through in the following ways:

- Questionnaire follow-up with appointed individuals regarding the process, support, and practices within their recruitment experience at the DSW
- Comparison of the DSW processes, practices and policies against those of other similar UK organisations, and other NGBs within Welsh sport
- Checking the currency of policy and procedure against legislation and guidance relating to safe, equitable recruitment practices
- Sign-off of policy through the DSW legal advisors (Dolmans)
- Endorsement and sign-off of the Recruitment Policy on an annual basis by the DSW Board

**5.5. Responsibility**

It is the responsibility of all staff involved with recruitment processes to ensure that best practice is observed throughout the advertising, appointment and induction of all new staff to DSW; and to ensure that they are appropriately prepared and skilled in areas of recruitment practices and equal opportunities. Ultimate responsibility for the currency, appropriateness and application of DSW Recruitment Policy rests with the Executive Director of DSW.

**5.6. List of Appendices relevant to Section 5**

Appendix	Title	Description
A5.1	<a href="#">DSW Recruitment Process</a>	Cyclical representation of the process DSW apply to recruitment
A5.2	<a href="#">DSW Recruitment Policy 2016</a>	This is DSW’s full Recruitment Policy
A5.3	<a href="#">DSW Application Form</a>	This will be received if an individual requests the opportunity to apply for a position with DSW
A5.4	<a href="#">DSW Reference Form</a>	This will be sent out to the contact the candidate supplies as a reference for previous employment or who will attest to their character and suitability for the position applied for.
A5.5a	<a href="#">Role Description – DSW Lead Welfare Officer</a>	Role description for the DSW Lead Welfare Officer
A5.5b	<a href="#">Role Description – DSW Associate Lead Welfare Officer</a>	Role description for the DSW Associate Lead Welfare Officer
A5.6	<a href="#">Role Description – DSW DBS Countersignatory</a>	Role description for individuals involved with countersigning DBS checks
A5.7	<a href="#">Role Description – DSW Head Coach</a>	
A5.8	<a href="#">Role Description – DSW Assistant Coach/Leader</a>	

<b>Appendix</b>	<b>Title</b>	<b>Description</b>
A5.9	<a href="#">Job Description (DSW Board Welfare Champion)</a>	Role description for the DSW Board Welfare Champion
A5.10	<a href="#">Self-Disclosure Form (Adults at Risk)</a>	Form to be completed by the individual being employed/deployed. This needs to be completed prior to receipt of the DBS check certificate.
A5.11	<a href="#">DSW List of Eligible Roles for DBS check</a>	DSW recommendations for those roles which meet the eligibility requirements for a DBS check associated with Regulated Activity
A5.12	<a href="#">About the Disclosure and Barring Service (DBS)</a>	Information about the Disclosure and Barring Service (DBS)
A5.13	<a href="#">DSW Disclosure and Barring Service Processes</a>	Outline of the DSW process for conducting DBS checks with staff and/or volunteers
A5.14	<a href="#">Guidance about Regulated Activity for Adults at Risk</a>	DBS recommendations about what is considered to be 'Regulated Activity' relating to adults at risk



# Section 6:

## Important Contacts

**DISABILITY SPORT WALES**  
**Sport Wales National Centre, Sophia Gardens**  
**Cardiff. CF11 9SW**  
**02920 334919**  
email: [welfare@disabilitysportwales.com](mailto:welfare@disabilitysportwales.com)

### Disclosure and Barring Services

[www.gov.uk/government/organisations/disclosure-and-barring-service](http://www.gov.uk/government/organisations/disclosure-and-barring-service)

**Helpline: 0870 90 90 811 (English)**

**Minicom: 0870 90 90 344**

[customerservices@dbs.gsi.gov.uk](mailto:customerservices@dbs.gsi.gov.uk)

PO Box 110  
Liverpool. L69 3JD

### Police Authorities of Wales Contact Details

[www.police.uk/forces/](http://www.police.uk/forces/)

If you have an immediate concern about safety or welfare of a (disabled) child or young person, and you need to call the police, telephone the **emergency number 999**

### Social Services Improvement Agency

[www.ssiacymru.org.uk/home.php?page\\_id=2592](http://www.ssiacymru.org.uk/home.php?page_id=2592)

**Telephone Number: 029 2046 8685**

[enquiries@ssiacymru.org.uk](mailto:enquiries@ssiacymru.org.uk)

Local Government House,  
Drake Walk,  
Cardiff. CF10 4LG

# Directory of Appendices

Appendix	Title	Description
A1.1	<a href="#">Template Policy Statement</a>	A template for clubs and organisations affiliated to Disability Sport Wales to use in creating a Adults at Risk Welfare and Safeguarding Policy
A2.1	<a href="#">Coaches Code of Conduct</a>	Outline of the ethical framework which a DSW Coach agree to abide by
A2.2	<a href="#">Athletes Code of Conduct</a>	Outline of the ethical framework which a DSW Athlete agrees to abide by
A2.3	<a href="#">Parents/Carers/Guardians Code of Conduct</a>	Outline of the ethical framework which a Parent/Carer/Guardian of a DSW athlete agrees to abide by
A2.4	<a href="#">Guidelines for Club Promotion through the DSW website</a>	DSW recommendations for good practice when promoting clubs for children and young people on the DSW website
A2.5	<a href="#">DSW's Commitment to e-safety: Using Social Media and Information Technology</a>	DSW position statement regarding e-safety and the role e-communication has within the organisation
A2.6	<a href="#">Athlete Agreement: Use of Social Media</a>	Agreement Form for DSW athletes to sign agreeing to standards for the use of social media
A2.7	<a href="#">Officers Agreement: Use of Social Media</a>	Agreement Form for DSW Officers (coaches, volunteers or others in a position of trust) to sign agreeing to standards for the use of social media
A3.1	<a href="#">DSW Anti Bullying Policy</a>	DSW Policy to combat and prevent bullying
A4.1	<a href="#">Responding to concerns or allegations of abuse towards an adult at risk</a>	DSW process which MUST be followed if there are concerns that some OUTSIDE of DSW has abused or has been alleged to abuse a child or young person attending a DSW session
A4.2	<a href="#">Responding to concerns about a DSW staff member or volunteer towards an adult at risk</a>	DSW process which MUST be followed if there are concerns that a DSW member of staff or volunteer has abused or has been alleged to abuse a child or young person
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A4.5	<a href="#">DSW Welfare Discipline and Dispute Resolution Procedure (DSW Employee)</a>	Discipline and dispute resolution policy for those employed or deployed by DSW

<b>Appendix</b>	<b>Title</b>	<b>Description</b>
A4.6	<a href="#">DSW Welfare Discipline and Dispute Resolution Procedure (Athlete)</a>	Discipline and dispute resolution policy for athletes
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A4.10	<a href="#">DSW Whistleblowing Policy</a>	DSW Whistle Blowing Policy which can be evoked if an individual believes that a member of DSW staff is behaving inappropriately
A4.11	<a href="#">DSW Risk and Case Management Process (Adults at Risk)</a>	DSW process highlighting training requirement through to responding to an issue raised within the DBS check
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A4.15	<a href="#">e-safety Incident Report Form</a>	Template form which outlines the key elements of information which should be captured if there is an incident, or poor practice linked to e-technology or social media
A4.16	<a href="#">Responding to concerns about an e-safety incident</a>	DSW process which MUST be followed if there are concerns about an e-safety incident
A5.1	<a href="#">DSW Recruitment Process</a>	Cyclical representation of the process DSW apply to recruitment
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<b>Appendix</b>	<b>Title</b>	<b>Description</b>
A5.6	<a href="#">Role Description – DSW DBS Countersignatory</a>	Role description for individuals involved with countersigning DBS checks
A5.7	<a href="#">Role Description – DSW Head Coach</a>	
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