

Dundee Dragons Wheelchair Sports Club SCIO

Adult Protection Policy

Version 2.0 – August 2026

Approved by: DDWSC Trustees

Review date: August 2027, or sooner if required

Policy owner: Club Safeguarding Officer

Related documents: Child Protection Policy; Safe Recruitment Policy; Codes of Conduct; Complaints Policy; Equality, Diversity and Inclusion Policy; Data Protection and Privacy Policy; Incident Report Form; Transport and Trips Guidance.

Important: This policy is an operational safeguarding document, not a substitute for professional legal advice, local authority adult protection procedures, Police Scotland guidance, Disclosure Scotland guidance, or the current requirements of DDWSC's governing body and insurers.

Dundee Dragons
Wheelchair Sports Club

1. Policy statement

Dundee Dragons Wheelchair Sports Club SCIO (DDWSC) is committed to providing a safe, inclusive, respectful and accessible sporting environment for every adult participant, volunteer, coach, office bearer, employee, visitor and other person involved in club activities.

DDWSC will take reasonable and proportionate steps to prevent and respond to abuse, neglect, exploitation, bullying, harassment, discrimination, poor practice and other safeguarding concerns. We will promote the rights, wellbeing, dignity, privacy, autonomy and participation of adults, including adults who may meet the legal definition of an adult at risk of harm.

This policy applies to all DDWSC activities, including training, competition, travel, events, fundraising, meetings, online activity, social media, communications, overnight stays and activities delivered by or on behalf of the club. It applies whether the concern arises at the club, at home, online, during transport or elsewhere.

DDWSC will work in accordance with the Adult Support and Protection (Scotland) Act 2007 and its current Code of Practice, the Protection of Vulnerable Groups (Scotland) Act 2007 as amended, the Disclosure (Scotland) Act 2020 and relevant current Disclosure Scotland guidance, the Equality Act 2010, the UK GDPR, the Data Protection Act 2018, the Human Rights Act 1998 and other applicable law and guidance.

The club recognises the United Nations Convention on the Rights of Persons with Disabilities and will use a rights-based, trauma-informed and person-centred approach wherever practicable.

2. Scope and terminology

2.1 Adults

For the purposes of Scottish adult support and protection law, an adult is a person aged 16 or over. A separate Child Protection Policy applies to children and young people under 18, subject to the club's arrangements for people aged 16 and 17 who may fall within both policies.

Where a concern involves a person aged 16 or 17, the Safeguarding Officer will determine, with advice from the relevant governing body or statutory agency, which procedures should be followed and how the two policies should operate together. The club will not delay action while attempting to categorise the concern.

2.2 Adult at risk of harm

Under section 3 of the Adult Support and Protection (Scotland) Act 2007, an adult is an adult at risk of harm if all three of the following apply:

1. The adult is unable to safeguard their own wellbeing, property, rights or other interests.
2. The adult is at risk of harm.
3. The adult is more vulnerable to being harmed than adults who are not so affected because of disability, mental disorder, illness or physical or mental infirmity.

DDWSC does not decide conclusively whether someone is an adult at risk of harm. That is a matter for the relevant council and other statutory agencies under the legal framework. A concern should be reported even where the person reporting it is unsure whether the three-point test is met.

2.3 Protected adult and regulated role

“Protected adult” and “regulated role” are terms used in the PVG and disclosure framework. They are not interchangeable with “adult at risk of harm”. Whether a role is regulated, and whether PVG scheme membership is required, must be assessed against the current Disclosure Scotland rules and the role's actual duties. DDWSC will not rely on job titles alone.

From the applicable commencement dates, DDWSC will not offer or permit a person to carry out a regulated role with protected adults unless the person has the legally required PVG scheme membership and DDWSC has completed the required organisational checks. The Safeguarding Officer will seek advice from Disclosure Scotland where the status of a role is unclear.

3. Principles

DDWSC will apply the following principles:

- The adult's rights, wishes, feelings, dignity and wellbeing should be central to decisions about them.
- Adults should be supported to participate in decisions and to communicate in the way that works best for them.
- An unwise decision does not, by itself, establish incapacity or justify overriding an adult's wishes.
- Action should be lawful, necessary, proportionate, least restrictive and based on the available information.
- Concerns will be taken seriously and passed promptly to the appropriate person or agency.
- The club will not investigate criminal allegations itself or attempt to decide whether abuse has occurred.
- Information will be shared only where there is a lawful basis and where sharing is necessary and proportionate; safeguarding confidentiality is not the same as promising secrecy.
- Reasonable adjustments, accessible communication and independent advocacy or support should be considered where appropriate.
- No person will be victimised or disadvantaged for raising a genuine concern in good faith.
- The club will respect equality, diversity, privacy and human rights, while recognising that safety may require proportionate protective action.

4. Responsibilities

4.1 DDWSC committee or board

The committee or board will:

- approve, implement and periodically review this policy;
- appoint a named Club Safeguarding Officer and a deputy where practicable;

- ensure that the club has suitable procedures, training, insurance and resources;
- ensure safe recruitment and appropriate PVG arrangements for regulated roles;
- support prompt referral to Police Scotland, the relevant local authority, health services, Disclosure Scotland, the governing body or another appropriate agency;
- protect whistleblowers and people who raise concerns from retaliation;
- maintain appropriate records and oversee learning after incidents; and
- ensure that safeguarding responsibilities are not left solely to one individual.

4.2 Club Safeguarding Officer

The Safeguarding Officer will:

- act as the principal club contact for safeguarding concerns;
- receive concerns, ensure immediate safety is considered and make or support referrals;
- contact the relevant local authority Adult Protection Committee or social work service when an adult protection concern may exist;
- contact Police Scotland where a crime, immediate danger or other police involvement may be indicated;
- liaise with the governing body's safeguarding lead and Disclosure Scotland where appropriate;
- maintain secure, accurate and proportionate safeguarding records;
- advise on risk management, safe practice, training, recruitment, transport, communication and events;
- ensure that concerns involving the Safeguarding Officer are referred to the deputy, chair or an external agency; and
- keep this policy and related procedures under review.

4.3 All people involved with DDWSC

Every coach, volunteer, employee, office bearer, participant and other person acting for or representing DDWSC must:

- follow this policy and the relevant code of conduct;
- maintain appropriate professional boundaries;
- report concerns promptly and not attempt to conduct their own investigation;
- cooperate with lawful safeguarding processes;
- use accessible and respectful communication; and
- never punish, threaten, shame, isolate or disadvantage a person for making or supporting a concern.

5. Preventing harm and poor practice

DDWSC will use risk assessments and clear procedures for coaching, personal assistance, equipment, transfers, changing facilities, transport, photography, online contact, one-to-one activity, competitions, trips and accommodation.

Examples of poor practice include:

- inadequate supervision or unsafe coach-to-participant ratios;
- working outside a person's competence or qualification;
- unnecessary or intrusive physical contact;
- carrying out personal care that the adult can safely do themselves;
- private or secretive communication with a participant;
- taking a participant to a private or secluded place without a clear, authorised reason;
- humiliating, threatening, belittling or discriminatory behaviour;
- inappropriate photography, filming or sharing of images;
- ignoring a reasonable adjustment or communication need;
- failing to respond appropriately to a concern; and
- gossiping about an allegation or disclosing information to people without a legitimate need to know.

Any relationship involving a significant power imbalance must be managed carefully. A coach, office bearer or other person in a position of trust must maintain professional boundaries and disclose any situation that could create a conflict of interest or affect safeguarding. The committee will consider proportionate management action, including changing responsibilities, supervision or reporting lines.

6. Types of harm and possible indicators

Harm may be a single incident or a pattern of conduct. It may be caused by a stranger, professional, volunteer, family member, partner, friend, carer, another participant or the organisation itself. It may occur in person or online.

The club recognises, among other things:

- **Physical harm:** hitting, pushing, inappropriate restraint, rough handling, misuse of equipment or medication, or unexplained injury.
- **Psychological or emotional harm:** threats, intimidation, coercive control, humiliation, bullying, isolation, harassment or controlling behaviour.
- **Sexual harm:** unwanted sexual contact, sexual harassment, grooming, exploitation, voyeurism, sexualised communication or non-consensual imagery.
- **Financial or material harm:** theft, fraud, coercion concerning money or benefits, misuse of property or pressure to change financial arrangements.
- **Neglect or acts of omission:** failure to provide necessary care, support, medication, food, warmth, privacy, access or medical attention where there is a responsibility to do so.
- **Self-neglect:** serious neglect of personal hygiene, health, safety or living conditions. Self-neglect should be approached respectfully and referred where support or statutory intervention may be needed.
- **Discriminatory harm:** harassment or abuse connected with a protected characteristic or perceived protected characteristic.

- **Organisational or institutional harm:** persistent unsafe, degrading, inflexible or abusive practice within an organisation or service.
- **Exploitation, trafficking or modern slavery:** forced labour, servitude, trafficking or severe restriction of freedom.
- **Radicalisation or extremist exploitation:** grooming, coercion or manipulation into harmful extremist activity. Concerns should be referred through the appropriate safeguarding and Prevent channels.

Indicators are not proof of harm. They may include unexplained injuries, fear of a particular person, sudden withdrawal, changes in communication, missing money or possessions, distress around personal care, deteriorating health, or changes in behaviour. Disability, illness or communication differences must not be assumed to explain away a concern.

7. Responding to a concern or disclosure

7.1 Immediate danger or urgent medical need

If there is an immediate threat to life or safety, or urgent medical attention is needed, call **999**. Tell the emergency service what has happened and request Police Scotland, ambulance or both as appropriate.

Do not put yourself or anyone else at unnecessary risk. Preserve immediate safety, do not confront an alleged perpetrator unless necessary to prevent imminent harm, and do not delay emergency action while contacting the Safeguarding Officer.

7.2 If an adult tells you something

- Stay calm and listen.
- Take the person seriously and thank them for telling you.
- Use the person's preferred communication method and make reasonable adjustments.
- Ask only open, necessary questions to clarify immediate safety; do not interrogate or lead them.

- Do not promise secrecy or guaranteed outcomes. Explain that information may need to be shared with people who can help keep them or others safe.
- Do not investigate, confront the alleged perpetrator, or ask the adult to repeat the account unnecessarily.
- Record the person's own words as soon as possible, including date, time, location and who was present.
- Report the concern immediately to the Safeguarding Officer or deputy, unless doing so could increase risk or the concern is about that person.

7.3 Consent, capacity and information sharing

Where practicable, explain to the adult what information may be shared, with whom and why, and seek their views and consent. An adult's views remain important even where consent is not legally required or cannot safely be obtained.

Consent is not the only possible basis for sharing information. Information may need to be shared without consent where there is a lawful basis and sharing is necessary and proportionate—for example, to prevent serious harm, protect another person, support the investigation or prevention of crime, comply with a legal duty, or support statutory adult protection functions.

The club will not assume that disability means a person lacks capacity. Capacity is decision-specific and should not be treated as a general status. Where capacity or communication is in question, the club will seek appropriate professional or statutory advice and consider advocacy and communication support.

7.4 Referral

The Safeguarding Officer, or another responsible person where necessary, will refer concerns promptly to the relevant agency. This may include:

- Police Scotland: **999** in an emergency or **101** for non-emergency police matters;

- the relevant local authority social work or Adult Protection service, including its out-of-hours service where applicable;
- NHS or other medical services;
- the club's governing body or sport safeguarding lead;
- Disclosure Scotland, where the statutory referral criteria are met; and
- another specialist service appropriate to the concern.

A report should be made even if the person reporting is uncertain whether the concern meets a statutory threshold. The receiving agency will decide what action and investigation are appropriate.

7.5 Historical allegations

A historical allegation must be treated seriously. The club will consider whether the alleged person is currently involved in DDWSC or another setting, whether others may be at risk, and whether referral to Police Scotland, the local authority, Disclosure Scotland or the governing body is required. The passage of time does not, by itself, remove the need to report or preserve information.

8. Disclosure Scotland and PVG duties

DDWSC will assess every relevant paid and unpaid role against the current PVG and regulated-role requirements. It will maintain appropriate records of role assessments, applications, confirmations, and changes in role.

Where a person carrying out a regulated role has harmed, or placed a protected adult at risk of harm, DDWSC will consider whether it has a legal duty to make a referral to Disclosure Scotland. A referral may be required where the organisation dismisses the person, would or might have dismissed them had they not left, or permanently moves them away from regulated work, subject to the statutory criteria and current Disclosure Scotland guidance.

The Safeguarding Officer will obtain advice from Disclosure Scotland where necessary. The club will not delay a police or local-authority referral while considering a PVG referral, and will not assume that a PVG referral replaces other safeguarding action.

9. Confidentiality, records and data protection

DDWSC will process safeguarding information in accordance with applicable data-protection law, including the UK GDPR and Data Protection Act 2018. Safeguarding information is sensitive and will be accessed only by people who need it for a legitimate safeguarding, legal, governance or support purpose.

The club will:

- record facts, decisions, actions and professional advice accurately and promptly;
- distinguish allegations, observations, disclosures, opinions and verified facts;
- keep records securely with appropriate access controls;
- share information on a lawful, necessary and proportionate basis;
- avoid unnecessary circulation, group emails or informal discussion;
- retain records only for as long as required by law, safeguarding need, insurance, funding, governance or the club's retention schedule; and
- provide privacy information explaining how safeguarding data is handled, subject to lawful restrictions on disclosure.

Confidentiality does not prevent a necessary safeguarding referral. However, information must not be shared more widely than necessary. A person who makes a report should be told, so far as lawful and safe, what will happen next, but cannot be promised a particular outcome or complete confidentiality.

10. Fairness, complaints and alleged perpetrators

DDWSC will seek to protect adults while also treating the person who is the subject of an allegation fairly. The club will not presume guilt or conduct a disciplinary investigation in a way that prejudices a police or statutory investigation.

Where appropriate, interim measures may be taken to manage risk. These may include supervision, changes to duties, temporary suspension from activity, restrictions on contact or other proportionate steps. Interim action is not a finding that an allegation is true.

Concerns about a Safeguarding Officer should be reported to the deputy, chair or relevant governing-body safeguarding lead. Concerns about the committee or organisation may be referred directly to the relevant statutory agency or governing body.

A person who believes the club has not handled a concern properly may use the DDWSC Complaints Policy, without preventing them from contacting Police Scotland, the local authority, Disclosure Scotland, the Information Commissioner's Office or another appropriate body.

11. Training, recruitment and review

DDWSC will provide safeguarding induction and appropriate refresher training for coaches, volunteers, employees, office bearers and others whose role requires it. Training will include recognising harm, responding to disclosures, accessible communication, boundaries, reporting routes, information sharing and the particular risks and strengths relevant to disabled participants.

The club will use safer recruitment procedures proportionate to the role, including references, identity checks, role descriptions, self-declarations and PVG checks or membership where legally required. A PVG check is not a substitute for safer recruitment, supervision, training or good safeguarding practice.

This policy will be reviewed at least annually and after a significant incident, a change in legislation or guidance, a material change in club activities, or advice from the governing body, local authority, Disclosure Scotland or another competent authority.

12. Contacts and local arrangements

The club must complete and keep this section current before approval:

- **Club Safeguarding Officer:** [name / telephone / email]
- **Deputy Safeguarding Officer:** [name / telephone / email]
- **Club chair or emergency committee contact:** [name / telephone / email]
- **Governing-body safeguarding lead:** [organisation / telephone / email]
- **Relevant local authority Adult Protection / social work contact:** [telephone / website]
- **Out-of-hours social work contact:** [telephone]
- **Disclosure Scotland:** use the current official Disclosure Scotland referral route and guidance.
- **Police Scotland:** 999 for emergencies; 101 for non-emergency matters.

The club will publish a short accessible reporting guide containing these contacts and will provide it in alternative formats on request.

Appendix 1: Quick reporting guide

1. **Is anyone in immediate danger or in need of urgent medical help?** Call 999.
2. **Listen, reassure and make the person safe.** Do not investigate or promise secrecy.
3. **Report immediately** to the Safeguarding Officer, deputy or chair. If the concern is about them, bypass them.
4. **Refer promptly** to the relevant local authority, Police Scotland, health service, governing body or other agency.
5. **Record facts and actions** on the Incident Report Form as soon as possible.

6. **Share only on a need-to-know basis** and store the record securely.

Appendix 2: Key legal and guidance framework

This policy should be read with the current versions of:

- Adult Support and Protection (Scotland) Act 2007;
- Adult Support and Protection (Scotland) Act 2007 Code of Practice;
- Protection of Vulnerable Groups (Scotland) Act 2007;
- Disclosure (Scotland) Act 2020 and current Disclosure Scotland guidance;
- Equality Act 2010;
- Human Rights Act 1998;
- UK GDPR and Data Protection Act 2018;
- relevant Scottish Government, local authority, Police Scotland, governing-body and sportscotland safeguarding guidance; and
- DDWSC's related policies and procedures.

The UK is no longer an EU Member State. EU law is therefore not generally the direct legal framework for DDWSC's domestic Scottish activities. If DDWSC offers services to, monitors, or transfers personal data concerning people in the European Economic Area, it will take separate advice on whether the EU GDPR or other EU requirements apply.