



SAFEGUARDING ADULTS AT RISK POLICY & PROCEDURES

**Quay Climbing Centre
Clip 'n Climb Exeter
Boulder Exe**

Designated Safeguarding Officer: Jennifer Thomas
Management Safeguarding Lead: Gavin Atkins
Director Responsible for Safeguarding: Alison Smith

VERSION 2.2 – 6th April 2026

TABLE OF CONTENTS

SAFEGUARDING ADULTS AT RISK POLICY & GUIDELINES _____	3
SAFEGUARDING POLICY STATEMENT _____	7
RECOGNISING ABUSE AND NEGLECT _____	9
WELLBEING PRINCIPLE _____	12
Mental Capacity and Decision Making _____	13
HOW TO RESPOND TO A DISCLOSURE, SUSPICION OR ALLEGATION _____	14
Recording and Information Sharing _____	20
IDENTIFYING POOR PRACTICE _____	22
PROCEDURE FOR INVESTIGATIONS AND DISCIPLINARY PROCESSES _____	23
WHISTLEBLOWING POLICY _____	25
APPENDIX 1 _____	29

SAFEGUARDING ADULTS AT RISK POLICY & GUIDELINES

Introduction & Key Principles

The Quay Climbing Centre Group is committed to safeguarding adults in line with national legislation and relevant guidelines and accepts its responsibility to safeguard the welfare of adults at risk of abuse, who are unable to protect themselves from potential harms involved in activities undertaken.

This requires that we understand:

- The definition of adults at risk and the circumstances which may increase risk
- How adult abuse, exploitation or neglect manifests itself
- The procedures in place for reporting any safeguarding concerns
- That our duty extends to reporting harm experienced anywhere, not just within our activities. If we have a concern, we have a duty to report it.

“We are committed to creating and maintaining a safe and positive environment and operate a culture of zero tolerance of harm to adults at risk”

Legal Framework

This policy is informed by national and international legislation and guidance that together establish the rights of adults, define responsibilities for safeguarding, and set out procedures for preventing and responding to abuse or neglect. The following framework underpins our approach to adult safeguarding:

- **UN Convention on the Rights of Persons with Disabilities (2006):** Affirms the rights of disabled people to live free from discrimination, abuse, and exploitation, and to participate fully in all aspects of community life, including leisure and sport. This underpins the organisation’s commitment to accessibility, inclusion, and equality for all climbers.
- **Human Rights Act 1998:** Protects individuals’ fundamental rights and freedoms, ensuring that all public bodies, including care providers, treat people with dignity, respect, and fairness.
- **Safeguarding Vulnerable Groups Act 2006:** Establishes the legal framework for safer recruitment, including vetting and barring of individuals deemed unsuitable to work with vulnerable groups.

- **The Care Act 2014:** Sets out the legal framework for adult safeguarding in England, placing a duty on local authorities and partners to prevent, identify, and respond to abuse and neglect while promoting individual wellbeing.
- **Adult Safeguarding: Prevention and Protection in Partnership Policy Document (2015):** Provides guidance for coordinated multi-agency responses to adult safeguarding concerns across organisations.
- **Equality Act 2010:** Protects individuals from discrimination, harassment, and victimisation, and promotes equality of opportunity for all, including those with disabilities or additional needs.
- **Protection of Freedoms Act 2012:** Provides safeguards for individuals through the regulation of data protection, information sharing, and the Disclosure and Barring Service (DBS) system.
- **Mental Capacity Act 2005:** Sets out how to assess and support decision-making for individuals who may lack capacity, ensuring their rights, independence, and best interests are protected.
- **Sexual Offences Act 2003:** Defines sexual offences and provides legal protection for adults at risk of sexual exploitation or abuse, including those who may have impaired capacity to consent.
- **Domestic Violence, Crime and Victims (Amendment) Act 2012:** Strengthens protections for victims of abuse and neglect and reinforces the duty to take action where adults may be at risk of harm.
- Legislation covering the management of data including **The Data Protection Act 2018** and **General Data Protection Regulations 2018**

We will adopt best practice guidelines set out by industry bodies and our sport governing bodies including:

- The **British Mountaineering Council (BMC)** and **Association of British Climbing Walls (ABC)**.
- Guidance provided by specialist organisations such as the **Ann Craft Trust**

Definition of Adults at Risk

An adult at risk is any adult who:

- has a need for care or support, long or short term (whether or not any of these needs are being met by authorities)
- is experiencing, or at risk of experiencing, abuse or neglect as a result of those care or support needs
- as a result of those care and support needs, is unable to protect themselves from the risk of abuse or neglect.

The term **Vulnerable Person** is an adult who:

- Is suffering from a disorder of the mind, whether as a result of mental illness or dementia
- Has an intellectual disability
- Is suffering from physical impairment, as a result of injury, illness, age or;
- Has a physical disability

Where the presence of the above is of such nature or degree that:

- It restricts the capacity of the person to safeguard themselves against harm by another person, or
- That results in the person requiring assistance with the activities of daily life including dressing, eating, walking, washing and bathing.

Capacity refers to the ability to make decisions at a particular time, for example, when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (Mental Care Act 2015).

Guiding Principles

Our approach is underpinned by the following principles (enshrined within the Care Act 2014 and the Adult Safeguarding: Prevention and Protection in Partnership Policy Document 2015):

- **Empowerment** – support/encourage individuals to make their own decisions
- **Prevention** – it is better to act before harm occurs
- **Proportionality** – adopt the least intrusive response to the risk presented
- **Protection** – support and represent those in the greatest need
- **Partnership** – work with local communities and partnerships
- **Accountability** - accountability and transparency are essential in safeguarding

All employees, coaches, volunteers and participants are expected to understand these duties and ensure that their practice, conduct, and decision-making reflect the requirements set out in this safeguarding framework.

Policy Scope

This policy and associated guidelines/Codes of Conduct apply to:

- All activities provided by the Quay Climbing Group (company name Quay Climbing Centre Ltd) including activities delivered at Quay Climbing, Clip 'n Climb Exeter and Boulder Exe **and** activities delivered by employees of Quay Climbing that take place in external venues including, but not limited to, outdoor climbing crags, external training and participation in competitions or events.

- All employees and volunteers working for or with the Quay Climbing Group
- All Adults at Risk who participate in these activities

Associated Policies

The following codes and policies are referenced in the Adult Safeguarding Policy and govern practices that form part of our wider Safeguarding approach:

- Whistleblowing Policy (included within this policy)
- Safer Recruitment Policy
- Codes of Conduct for coaches/instructors, parents and participants
- Anti Bullying Policy
- Online Safety/Social Media Policy
- Filming and Photography Policy
- Employee Handbook

Company Addresses/Locations

Company Registered Address:

Quay Climbing Centre Ltd, Haven Road, Exeter, EX2 8AX

Company Locations/Centres:

Quay Climbing Centre – Haven Road, Exeter, EX2 8AX

Clip ‘n Climb Exeter – Haven Road, Exeter, EX2 8AX

Boulder Exe – Tudor Street, Exeter, EX4 3BR

Monitoring

This policy will be reviewed every two years, or in the following circumstances:

- changes in legislation and/or government guidance
- as required by regulatory or governing bodies (such as the BMC or ABC)
- as a result of any other significant change or event.

This policy was last reviewed on 04 / 10 / 2026 [Date]

Managing Director:

Signed



Damian Johnson

Director with Responsibility for Safeguarding:

Signed



Alison Smith

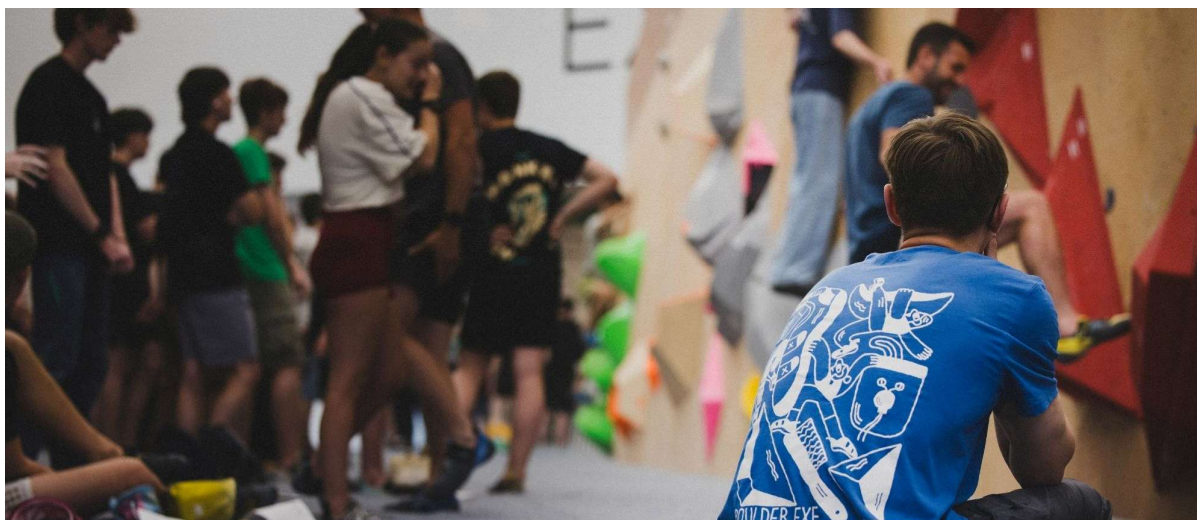
SAFEGUARDING POLICY STATEMENT

Our Statement

Our organisation acknowledges its duty of care to safeguard and promote the welfare of all adults participating in our activities. We believe that all adults, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment. We will seek to ensure that our activities are inclusive and make reasonable adjustments for ability, disability or impairment. The rights, dignity and worth of all adults will always be respected.

We recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, for example those who have a dependency on others or who have different communication needs. We also recognise that a disabled adult may or may not identify themselves (or be identified) as an 'adult at risk'.

We have a shared responsibility to ensure the safety and wellbeing of adults and will act appropriately and report concerns. All allegations will be taken seriously and responded to quickly in line with this policy.



Our Policy: What We Will Do

As part of our safeguarding policy we will:

- promote and prioritise the safety and wellbeing of adults at risk participating in our activities taking a person centred approach.

- ensure robust safeguarding procedures are in operation so that everyone knows what to do and who to contact if they have a concern relating to the welfare or wellbeing of an adult
- ensure everyone understands their roles and responsibilities in respect of safeguarding adults and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse
- ensure that our venues and activities are appropriately risk assessed in line with industry best practice and our own **Standard Operating Procedures**, considering the needs of all users, including adults at risk
- ensure that there are clear **Codes of Conduct** in place for Instructors/Coaches.
- ensure appropriate action is taken in the event of any incidents or concerns, from lower-level concerns to more serious abuse
- ensure that a clear **Anti Bullying Policy** is in place and implemented.
- ensure that escalation routes to the Designated Safeguarding Officer and to statutory agencies (e.g. the Police or Local Authorities) and/or industry bodies are understood and clearly communicated
- ensure that a **Whistleblowing Policy** is in place to support employees, volunteers or participants to safely raise concerns
- record and store information securely, in line with data protection legislation and guidance [more information about this is available from the Information Commissioner's Office]
- prevent the employment or deployment of unsuitable individuals by recruiting staff and volunteers safely, with necessary checks, in line with a clear **Safer Recruitment Policy**
- appoint a nominated Designated Safeguarding Officer (DSO) (who will typically be someone who is not a director of the company or Centre Manager/Director), a deputy who will typically be the Centre Director and a lead director/board member for safeguarding (who will typically be one of the company owners).
- develop and implement an effective **Online Safety/Social Media Policy** and related procedures
- ensure that there are clear **Guidelines for the Use of Photography/Filming**

The policy and procedures will be widely promoted and are mandatory for everyone involved in The Quay Climbing Centre Group. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal or exclusion from the organisation.

RECOGNISING ABUSE AND NEGLECT

Abuse is a violation of an individual's human and civil rights by another person or persons. It can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Any or all of the following types of abuse (defined in the Care Act 2014) may be perpetrated as the result of deliberate intent, negligence, omission or ignorance.

- **Physical** – hitting, pushing, slapping or punching an individual and the inappropriate use of medication, restraint or inappropriate sanctions
- **Sexual** - includes rape, sexual assault or harassment, indecent exposure, sexual grooming or coercion, teasing or innuendo, sexual photography, subjection to pornography, or sexual acts to which the individual has not consented.
- **Neglect and acts of omission** – includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services or the withholding of the necessities of life such as medication, adequate nutrition and heating.
- **Emotional, psychological** – includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, isolation, withdrawal from support or networks.
- **Financial or material abuse** – includes theft, fraud, internet scamming and coercion in relation to an adult's financial affairs or arrangements including in connection with wills, property, inheritance or financial transactions. In a sporting context this could be someone taking equipment from an athlete or asking them to pay for things they should not have to pay for.
- **Discriminatory abuse** – centres on a difference or perceived difference with respect to one of the Protected Characteristics of the Equality Act.
- **Organisational/institutional abuse** – includes neglect and poor practice within an institution or setting, such as a care home or club for people with disabilities. It can be deliberate, the result of poor practice and policies within an institution.
- **Self-neglect** – neglecting to care for one's personal hygiene, health or surroundings, and includes behaviour such as hoarding
- **Domestic abuse including coercive control** – including psychological, physical, sexual, financial and emotional abuse.
- **Modern slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. The perpetrators use coercion, deception and threat to force individuals into servitude.

Abuse can take place in any relationship and there are many contexts in which abuse might take place, e.g. institutional abuse, domestic abuse, forced marriage, human trafficking, modern slavery, sexual exploitation, county lines, radicalisation, hate crime, cyber bullying and scams.

Within sport and climbing there is the potential for abuse by anyone involved in the sport (coach, employee, volunteer, participant, spectator...). For example:

- Harassment of a participant because of their (perceived) disability or other protected characteristics
- Not meeting the needs of the participant e.g. training without a break, training without due care to nutrition or hydration
- A coach intentionally striking an athlete
- One elite participant controlling another
- A participant threatens another participant with physical harm and persistently blames them for poor performance
- An official who sends unwanted sexually explicit messages to a participant with learning disabilities

Abuse or neglect outside of the sport could be carried out by:

- A spouse, partner or family member
- Neighbours or residents
- Friends, acquaintances or strangers
- People who deliberately exploit adults they perceive as vulnerable
- Paid staff, professionals or volunteers providing care and support

Often the perpetrator is known to the adult and may be in a position of trust and/or power.

Possible Signs of Abuse

It is not always easy to recognise a situation where abuse is occurring or has already occurred. The Quay Climbing Group acknowledges that its employees and volunteers are **not necessarily experts at such recognition**. The Quay Climbing Group therefore expects them to discuss any concerns they may have with regards to the welfare of an Adult at Risk with the **Designated Safeguarding Officer or, in their absence, the Management Safeguarding Lead**

“It is NOT the responsibility of those involved in The Quay’s activities to decide whether abuse is occurring, but it is their responsibility to act upon any concerns.”

Below are listed some of the characteristics which may be evidence of abuse. These are by no means exhaustive and are only indicators of potential abuse, **not** confirmation that abuse is taking place.

- Unexplained or suspicious injuries such as bruising, cuts or burns, particular if situated on a part of the body not normally prone to injury
- Unexplained changes in behaviour: withdrawal, aggression, anxiety. Changes in behaviour around a particular individual or group compared to normal behaviour
- Person has belongings or money going missing
- Person is not attending sessions or no longer enjoying them – you may notice a participant is missing from practice and not responding to reminders
- Disclosure of abuse or concerning comments
- Self-harm
- Person displays fear of a particular group or individual
- Displaying variation in eating patterns, including overeating or loss of appetite
- Poor hygiene or inappropriate clothing – losing weight or gaining weight.
- A carer or parent speaks for a person and doesn't allow them to make their own choices.



WELLBEING PRINCIPLE

The concept of 'wellbeing' is threaded throughout UK legislation and is part of the Law about how health and social care is provided. Our wellbeing includes our mental and physical health, our relationships, our connection with our communities and our contribution to society. Being able to live free from abuse and neglect is a key element of wellbeing. Actions taken to safeguard an adult must take their whole wellbeing into account and be proportionate to the risk of harm.

“The success of sport, in terms of helping people achieve their potential, making the most of existing talent, and attracting new people to sport relies on putting people – their safety, wellbeing and welfare at the centre of what sport does.”

*Duty of Care in Sport Independent Report to Government
Baroness Tanni Grey-Thompson DBE DL*

Person Centred Safeguarding/Making Safeguarding Personal

The legislation also recognises that adults make choices that may mean that one part of our wellbeing suffers at the expense of another. For example, we may move away from friends and family to take a better job. Similarly, adults can choose to risk their personal safety; for example, to provide care to a partner with dementia who becomes abusive when they are disorientated and anxious.

None of us can make these choices for another adult. If we are supporting someone to make choices about their own safety, we need to understand 'what matters' to them and what outcomes they want to achieve from any actions taken to help them to protect themselves.

The concept of 'Person Centred Safeguarding' or 'Making Safeguarding Personal' means engaging the person in a conversation about how best to respond to their situation in a way that enhances their involvement, choice and control as well as improving their quality of life, wellbeing and safety. The adults' views, wishes and feelings must be taken into account when decisions are made about how to support them to be safe.

If someone has difficulty making their views and wishes known, then they can be supported or represented by an advocate. This may be a safe family member or friend or a professional advocate.

MENTAL CAPACITY AND DECISION MAKING

Under UK law, all adults aged 16 and over are presumed to have the capacity to make their own decisions unless proven otherwise. People have the right to make their own choices—even if others consider those choices unwise. To have capacity to make a decision, a person must be able to:

- **Understand** relevant information
- **Retain** that information long enough to make the decision
- **Weigh up** the options and possible outcomes
- **Communicate** their decision in any way (verbally, through gestures, writing)

A person's ability to do this may be affected by conditions such as learning disability, dementia, brain injury, physical ill health, or mental distress.

Capacity can also fluctuate; if safe to do so, decisions should be delayed until the person can take part in decision-making.

Supporting Decision Making

Most adults can make their own decisions if given the right support. Support may include clear communication, extra time, or help from a carer or family member. If someone requires support to understand or make a decision, this must be provided. Being unable to make a decision is known as *lacking mental capacity*. This applies only to the specific decision at the specific time it is needed.

Mental Capacity and Safeguarding

Mental capacity is central to safeguarding practice.

- **Not allowing** an adult to make decisions they are capable of making can amount to abuse.
- **Coercion or intimidation** can also mean a person is unable to make free and informed choices.
- When abuse or neglect is suspected, the adult's capacity to decide about safeguarding actions must be assessed.

If the adult lacks capacity:

- Decisions must be made in their **best interests**, taking account of their known wishes and values.
- Actions taken should be the **least restrictive** to their rights and freedom.
- In emergencies, staff may need to act to keep the person safe (e.g. by sharing safeguarding concerns or preventing contact with a person causing harm).

Concerns about an adult who may lack capacity must be referred to the **Local Authority**, which will coordinate assessments and provide support.

HOW TO RESPOND TO A DISCLOSURE, SUSPICION OR ALLEGATION

“If you become aware of anything that makes you concerned you should raise it – to the Designated Safeguarding Officer.”

Reporting Concerns About Yourself

If you are experiencing harm within the Quay Climbing Group, please contact the Designated Safeguarding Officer or Deputy/Management Lead for Safeguarding immediately.

- If you are in immediate danger or require medical attention, contact the emergency services on 999
- If the Designated Safeguarding Officer or Management Lead is implicated, you should raise the issue with the Director Responsible for Safeguarding. The Whistleblowing Policy will give you advice about what to do if you do not feel you can raise your concerns with anyone in the organisation
 - You can also contact the Police, Social Services, your doctor or the organisations listed in the Key Contacts page to get help and support
- At all stages you are welcome to have someone you trust support you and help you explain what happened and what you want to happen.

Reporting Concerns About Others

If you have a safeguarding concern in relation to an adult at risk of abuse, in line with the categories of abuse listed in this policy, please follow these guidelines and the **Decision Flowcharts** on the following pages. You may be concerned about harm to another person because of something you have seen or heard, information you have been told by others or because someone has confided in you about things that are happening or have happened to them.

Responding to a Direct Disclosure

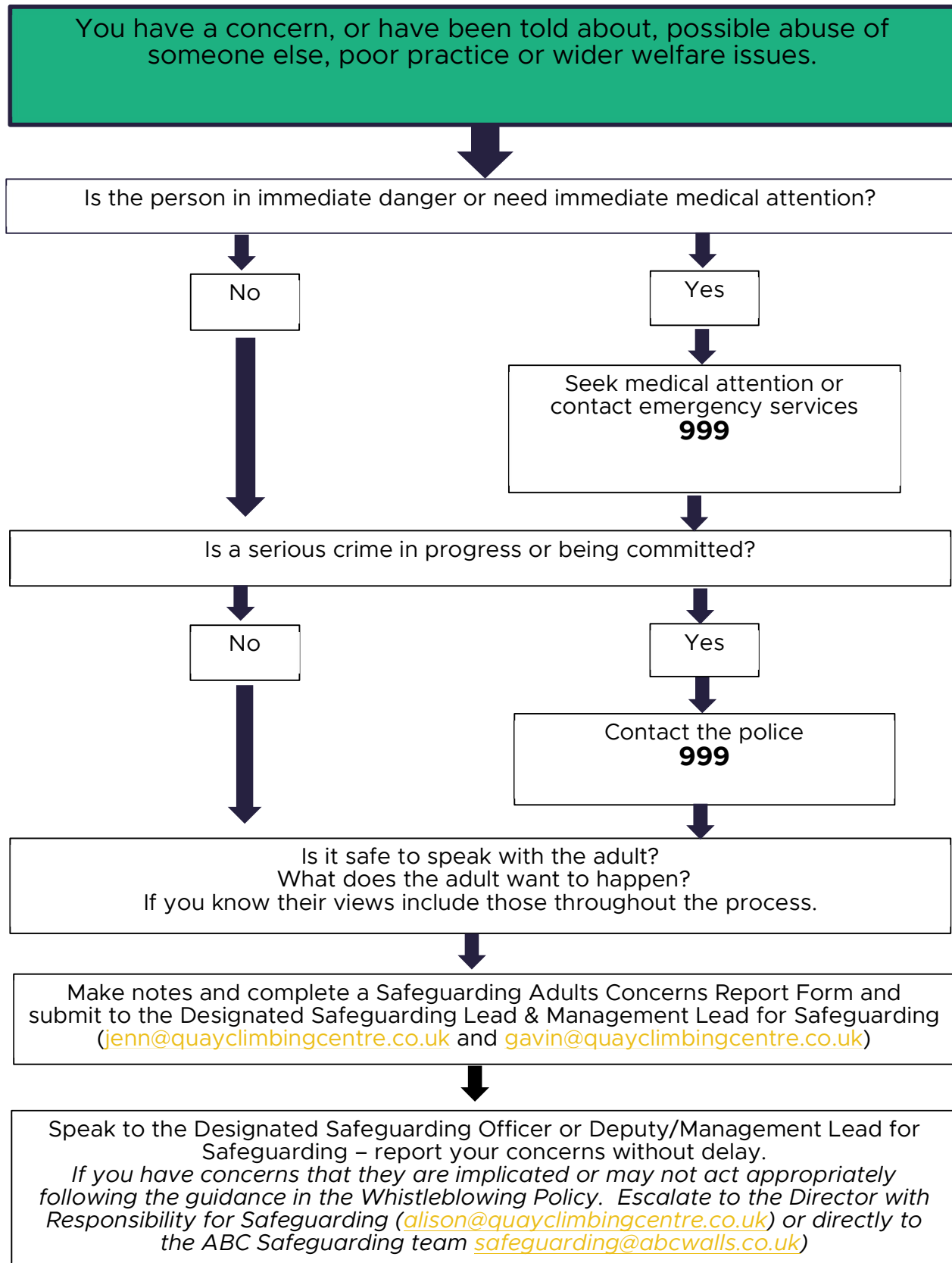
If an adult indicates that they are being harmed or abused, or information is received which gives rise to concern, the person receiving the information should: take it seriously, stay calm, listen carefully to what is being said, keep questions to a minimum and record what you have been told. Always reassure the individual that they have done the right thing in revealing the information and ask them what they would like to happen next. Follow the processes outlined in the Decision Flowchart on the following pages.

Summary

You should not keep safeguarding concerns to yourself. If you have any concerns about possible or alleged abuse, poor practice or wider welfare issues you must report to the Designated Safeguarding Lead or their Deputy/the Management Lead for Safeguarding. Please remember:

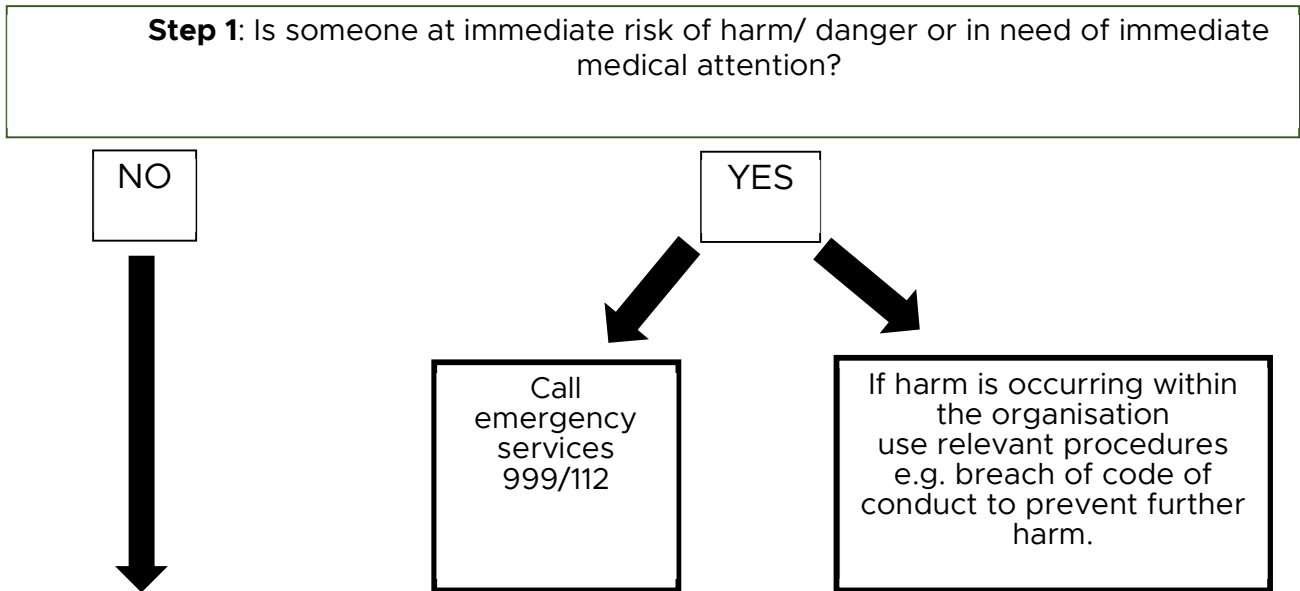
- It is not your responsibility to prove or decide whether an adult has been harmed or abused. It is, however, everyone's responsibility to respond to and report concerns they have.
- Ensure the safety of the person at risk. If the adult in question needs immediate medical attention, call 999. If someone is in immediate danger or a serious crime is being committed, contact the police on 999 straight away. *Where you suspect that a crime is being committed you must involve the police.*
- Stay calm and reassure that you are there to assist them. Do not promise secrecy on the issue.
- Remember to take a person-centred approach. If it will not put them or you at further risk, discuss your concerns with the adult and ask them what they would like to happen. Make sure their views and choices are voiced and listened to.
- Listen to what the adult has to say. Respect confidentiality. Keep questions to a minimum.
- Record all the relevant information on the **Safeguarding Adults Concerns Report Form**, especially what is seen and heard, so that the facts can be considered in any investigation and send to the Designated Safeguarding Officer/Deputy.
- You do not need consent to discuss a concern with the Designated Safeguarding Officer/Deputy/Director for Safeguarding, but you should let the adult at risk know that you will have to share information with the Safeguarding leads in the company.
- Concerns need to be reported to the authorities. Consent from the person affected can be obtained at this point by the authorities who have the power to investigate.
- Do not confront the person thought to be causing harm.

Reporting Concerns or Disclosures About Others



Procedure for Designated Safeguarding Lead/Management Lead for Safeguarding

Steps 1-5 **Initial response** (as soon as you receive the Safeguarding referral)



Step 2 – Safeguarding Report Details

If you have been sent a Safeguarding Adults Report Form check that you can understand what is written and that all the necessary parts have been completed. If you are being contacted directly request a completed Safeguarding Adults Report Form (staff and volunteers) or fill in the form with the person making the report (public/adult themselves)

Step 3- Person Making the Report

Inform, reassure and advise the person making the report e.g. what to do/what not to do. Explain what will happen next. Reinforce the need for confidentiality.

Step 4- Person at Risk

What are the risks? What are the views of the adult? Are they an adult at risk? Do they need support to make decisions about their safety? Do you need to contact the adult directly? Is it safe for you to do so?

Step 5 – Person at Risk

If it is safe to do so - ensure the person at risk has information about what will happen next. Make sure they have been given information about other organisations that can support them (see Key Information)

Steps 6- 14 Taking Action

Step 6 – Consult and Decide

As needed consult the Director with Responsibility for Safeguarding/Local Authority/the Police and decide which of the following actions need to be taken.

<p>Step 7 If a serious crime is suspected contact the police</p>	<p>Step 8 If you believe there is an 'adult at risk' make a safeguarding adults report to the Local Authority (Devon Safeguarding Adults Partnership)</p>	<p>Step 9 If harm is suspected of being caused within The Quay Climbing Group e.g. by an employee, contracted worker, volunteer or member report to the Centre Director</p>	<p>Step 10 Consult with and inform the adult</p>
<p>Criminal enquiry, investigation, proceedings</p>	<p>Safeguarding adults process led by Local Authority</p>	<p>Organisation takes short term steps within relevant policy to prevent harm e.g. suspend employee, coach, volunteer or member</p>	<p>Organisation decides who will maintain regular contact with the adult/s who have been at risk of harm</p>

Step 11

Take advice from and **coordinate actions** taken by The Quay Climbing Group with those of **other agencies**. **Attend and contribute to Safeguarding Adults strategy meetings**

Step 12

Hold **Safeguarding Case Management meeting** to coordinate actions by The Quay Climbing Group

<p>Possible outcomes: e.g.</p> <ul style="list-style-type: none"> • Criminal Caution or Conviction • Police referral back to organisation • Referral to Independent Barring Board • Unsubstantiated– no further action 	<p>Possible outcomes e.g.</p> <ul style="list-style-type: none"> • LA enquiries triggered • Adult supported to 'make safeguarding personal' • Other adults at risk identified • Multi-agency meetings to coordinate actions • New/changed care and support and protection plan for any adult at risk • NOT an adult at risk – information and advice provided 	<p>Possible outcomes: e.g.</p> <ul style="list-style-type: none"> • Informal resolution • Education and training • Formal warning • Dismissal • Role conditions applied • Contract ended • Referred to Independent Barring Board • Unsubstantiated – no further action 	<p>Possible Outcomes: e.g.</p> <ul style="list-style-type: none"> • Adult receives information about the process • Adult supported to have their views and experience heard • Adult supported to gain support from other agencies • Adult continues to participate in organisation/sport
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Steps 13 and 14

Recording and reporting

Ensure decisions made, actions taken, and outcomes logged and reported

Key Safeguarding Contacts and Support Information

Quay Climbing Group Safeguarding Contacts	
Designated Safeguarding Officer	Jennifer Thomas jenn@quayclimbingcentre.co.uk t. 01392 426 850
Deputy Designated Safeguarding Officer/Management Lead for Safeguarding	Gavin Atkins gavin@quayclimbingcentre.co.uk t. 01392 426 850
Director Responsible for Safeguarding & Governance	Alison Smith alison@quayclimbingcentre.co.uk t. 07795 652 788

Safeguarding Support Contacts – Industry and NSPCC	
Association of British Climbing Walls (ABC) Safeguarding Advice	safeguarding@abcwalls.co.uk
British Mountaineering Council (BMC)/GB Climbing Safeguarding	safeguarding@thebmc.co.uk
Ann Craft Trust (ACT) – national organisation providing advice about adult safeguarding (dedicated adults in Sport and Activity Safeguarding Team)	Ann-craft-trust@nottingham.ac.uk t. 0115 951 5400

Police and Devon Safeguarding Agencies	
Emergency Services	Dial 999 – immediate risk/medical
Devon Safeguarding Adults Partnership.	Office Hours: t. 0345 1551 007 Emergency: 0345 6000 388 e.adultsc.safeguardingadultservices-mailbox@devon.gov.uk

Useful Websites	
National 24 Hour Domestic Abuse Helpline	nationaldatahelpline.org.uk
National LGBTQ Domestic Abuse Helpline	t. 0800 999 5428
Action on Elder Abuse	elderabuse.org.uk
Rape Crisis	rapecrisis.co.uk
Respond (support for victims of sexual abuse who have learning disabilities)	Respond.org.uk
Stop Hate Crime	Stophateuk.org/talk-to-us
Victim Support – support for anyone who is a victim of a crime	Victimssupport.com

RECORDING AND INFORMATION SHARING

If you receive a disclosure or have a concern that requires a disclosure you should complete a **Safeguarding Adults Report Form** (available in Deputy and in the Safeguarding Folder in each centre).

Complete the form as fully as possible, describing the circumstances in which the concern came about and what action you took/advice you gave. Be clear about the distinction between things that are facts or overhead or things that are opinions. If someone has made a disclosure to you, try to record it using the words the person used to describe the situation. If someone has written to you, always include the copy of the email/message/letter.

“Be mindful of the need to be confidential at all times. The information you record must only be shared with your Safeguarding team and others that have a need to know (for example agencies or those who need to know to keep the person safe whilst waiting for action to be taken.”

All information relating to safeguarding concerns must be managed in line with the **Data Protection Act (DPA)** and **GDPR**.

Key Principles

- Records must be accurate, relevant, factual, and securely stored.
- Access is limited to those with a legitimate ‘need to know’.
- Information can be shared within the organisation for safeguarding purposes (e.g. safeguarding case review meetings or internal reporting).

Sharing Information Externally

Personal information may be shared externally **with consent** or **without consent** if:

- Seeking consent would put someone at further risk
- There is a risk of harm to the adult or others (including children)
- The adult is under coercion or duress
- A crime has been or may be committed
- The adult lacks capacity to consent
- The person causing harm has care or support needs
- There is a statutory duty to report

If information is shared without consent, the adult should be informed when it is safe to do so.

Recording Decisions

Every decision to share—or not share—information must be **recorded**, including:

- The reason for the decision
- Who was consulted or gave advice
- Any follow-up actions required

If uncertain whether to share information, seek advice from the **Local Authority Safeguarding Team** or ABC Safeguarding advisor before disclosing personal details.

Where The Concern Relates To The Designated Safeguarding Officer Or Management Lead For Safeguarding.

In the event that your concern relates to the Safeguarding Team at the Quay Climbing Group please contact the Director Responsible for Safeguarding or report directly to the ABC safeguarding help desk for advice and guidance.

“If you are in any doubt or do not feel sharing your concerns with a Director or member of the team at Quay Climbing, please refer to our Whistleblowing Policy which is designed to support you to raise concerns independently. You may also seek guidance from the NSPCC 24 hour helpline 0808 800 5000 or the ABC Safeguarding Team.”

Where the concern relates to an employee, contractor or volunteer working for or with the Quay Group, they will be notified that an allegation has been made and what will happen next, including whether they will be suspended from their duties pending investigation.

IDENTIFYING POOR PRACTICE

What Is Poor Practice?

Poor practice is anything that contravenes the Quay Safeguarding Policy, best practice for delivering activities across our organisation (outlined in Standard Operating Procedures) or failure to adhere to the Codes of Conduct and Good Practice laid out for all employees in this document and in the Employee Handbook. Poor practice occurs where there is a lack of understanding, awareness and education – particularly in relation to what constitutes a safe, child-centred environment. Poor practice is not necessarily abuse, rather it is a breach of the codes of conduct which infringes an individual's rights. In the context of Safeguarding, poor practice relates to the behaviour of an employee or volunteer that causes distress or potential harm to a child, young person or vulnerable adult. In the widest context poor practice relates to any failure to observe best practice standards for delivery of our services and health and safety considerations.

Examples of poor practice in a climbing/coaching context include (but are not limited to):

- Delivering sessions that are not safely managed and where risks are not mitigated
- Over training or pressuring athletes during climbing sessions
- Not giving adults at risk/vulnerable adults the opportunity to contribute and make decisions
- The use of sexually inappropriate or suggestive comments, even in jest
- Inappropriate physical contact
- Shouting continuously or bullying tactics
- Failure to follow event guidelines, so putting participants in danger, or emergency procedures where an accident has occurred/or is likely to occur in the future.
- Coaching while under the influence of alcohol or drugs
- Failing to respond to an allegation or failure to report something of concern
- A combination of minor incidents could also be regarded as poor practice.

PROCEDURE FOR INVESTIGATIONS AND DISCIPLINARY PROCESSES

Procedure For Dealing With Poor Practice

Where concerns relate to poor practice of a safeguarding nature the first line of report should be to the Designated Safeguarding Officer and the Management Safeguarding Lead.

- If the incident meets the threshold for abuse, the Designated Safeguarding Officer will follow the procedures for reporting abuse as outlined in the flowchart. Advice will always be taken from statutory authorities/industry bodies regarding the next steps, pending any criminal or external investigation.
- If the incident relates to poor practice (not abuse) or the authorities do not pursue the matter, the Management Lead for Safeguarding will review the incident and determine the next course of action.
- In all cases, the Designated Safeguarding Office and Management Lead for Safeguarding, in consultation with any relevant governing bodies, will determine if it is appropriate for the accused employee or volunteer to be placed on temporary suspension from all or some duties pending an investigation.

Internal Investigation Procedures

An internal investigation group committee will be convened to consider all reports of poor practice. When dealing with safeguarding matters this group is typically referred to as the Safeguarding Referral Group or Case Group. This group will comprise the Designated Safeguarding Officer, the Management Lead for Safeguarding/Centre Director and may include a Company Director (typically the Director responsible for Safeguarding). External advisors, such as technical experts or representatives from industry bodies may also be part of this group where the Directors feel additional expertise is required.

Investigation procedures and, if required, any Disciplinary proceedings will follow the procedures set out in the Disciplinary Process in the Employee Handbook.

The outcome of a process relating to an allegation of abuse/poor practice may be:

- Requirement to undertake further training
- Requirement to work under supervision when delivering services to adults at risk
- Formal warning
- Sanction – including suspension or dismissal in the case of serious breaches, repeated breaches or gross misconduct

- No further action
- No case to answer

Where concerns relate to the Designated Safeguarding Officer or Management Lead for Safeguarding, the Director Responsible for Safeguarding will take the lead and consult with the ABC Safeguarding team.

Support for Employees and Stakeholders

If you have received a disclosure, reported an incident or are the subject of an allegation you may wish to speak to someone confidentially to help you deal with what you have heard or are experiencing. The Quay will advise of mental health and other support available through our membership of the Federation of Small Business and/or industry bodies such as the ABC.

The Quay pledges to treat all those involved in a safeguarding report or incident fairly and equitably, with transparent processes. Confidentiality is essential and, in some cases, there may be criminal proceedings or further investigations by professional agencies such as Social Services. It is expected that you keep personal details linked to the situation confidential.

What Happens If You Are Accused Of An Abusive Action?

In the event that you are accused of an abusive action or poor practice:

- Make notes of all your contacts with the person in question as soon as possible
- Seek access to professional and legal advice
- Follow the procedures laid out in the Safeguarding Policy
- Accept that colleagues may not be in a position to discuss the matter with you while the investigation is underway
- Accept that you may be suspended from working with young people or from work while any investigation is underway

These situations are incredibly challenging for all concerned. The Quay will do its utmost to remain impartial in all matters relating to an allegation. The main concern with any incident is the adult's welfare but it is important that the welfare of anyone accused is also considered.

WHISTLEBLOWING POLICY

The company has adopted a Whistleblowing Policy to support all employees and stakeholders to raise concerns or issues about someone or something in the organisation that constitutes poor practice, is an illegal activity or contravenes the Safeguarding Policy. A copy of this policy is also published in the Employee Handbook.

Policy Statement

This organisation encourages a free and open culture in dealings between its managers, employees, and all people with whom it engages in business and legal relations. In particular, this organisation recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the organisation's success ensured.

This policy is designed to provide guidance to all those who work with or within the organisation who may from time to time feel that they need to raise certain issues relating to the organisation with someone, in confidence.

Workers who, in the public interest, raise genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns.

This policy is underpinned by the legal framework set out in the Public Interest Disclosure Act 1998 (PDA) which protects workers who make a protected disclosure about wrongdoing in the workplace from dismissal or detrimental treatment.



Protected Disclosure

A disclosure is 'protected' if it meets these criteria:

- The worker **reasonably believes** the information shows one or more of the following:
 - A criminal offence
 - Breach of a legal obligation
 - Miscarriage of justice
 - Danger to health or safety
 - Damage to the environment
 - Deliberate concealment of any of the above
 - Sexual harassment, including behaviour that may create an intimidating, hostile, degrading, humiliating or offensive working environment
- The disclosure must be made in the public interest (a key test introduced by the Enterprise and Regulatory Reform Act 2013).

A protected disclosure occurs when an employee/volunteer/contractor/board member/job applicant provides certain types of information, either to the employer or to a governing body/statutory body, which has come to their attention through work with an organisation. The 'whistleblower' is not usually directly or personally affected by the identified issue, danger or illegality, but may be in fear of repercussions for reporting it.

Protected disclosure is there to support employees and stakeholders to speak up where they think there is malpractice or breach of policies. The following do not typically fall under the remit of a protected disclosure:

- Exclusively workplace grievances
- Disputes with an employer linked to employment contracts
- Challenge to disciplinary or grievance procedures (Appeals processes are in place for this and are outlined in the Employee Handbook)
- When it is your job to uncover a wrongdoing (i.e. a police officer)
- When the information is disclosed in a legally privileged setting

Untrue Allegations

No disciplinary or other detrimental action will be taken against a whistleblower who makes an allegation in reasonable belief that it is in the interest of the welfare and wellbeing of the general public, even if the allegation is not substantiated by an investigation. An employer is vicariously liable for detrimental treatment and if this occurs it should be immediately raised with a Manager or Director so that the matter can be investigated thoroughly. Detrimental treatment includes, for

example, harassment, bullying or not complying with a person's rights and entitlements under their contract of employment.

However, disciplinary action may be taken against a whistleblower who makes an allegation carelessly, maliciously, for personal gain or where the disclosure contains information which the worker does not substantially believe to be true. This may constitute gross misconduct for which summary dismissal is the sanction.

Procedure

- If a worker wishes to raise or discuss any issues which might fall into one of the categories listed in clause (1), they should contact the Centre Director/Management Lead for Safeguarding or, in their absence one of the Company Directors. This person will, insofar as is possible, treat the matter in confidence. It is likely that an investigation will be necessary and the worker who has made the disclosure may be required to attend an investigatory hearing and/or a disciplinary hearing (as a witness). Appropriate steps will be taken to ensure that the worker's working relationships are not prejudiced by the fact of the disclosure.
- If a worker reasonably believes that the relevant failure (i.e. one of the set of circumstances listed above under clause (1)) relates wholly or mainly to the conduct of a person other than someone who works for the Quay Climbing Centre Ltd, then they should make that disclosure to that other person's employer.
- Where the individual believes that it is inappropriate to make the disclosure within the organisation (for example the Disclosure relates to practices of the organisations Directors or Centre Director) or where previous disclosures have been unsuccessful, they should contact either:
 - The ABC Safeguarding Team for advice and guidance; or
 - Protect (formerly known as Public Concern at Work) – the UK's leading charity advising on Whistleblowing – protect-advice.org.uk or telephone 0203 117 2520
- The Whistleblower may make their initial report verbally or in writing but should outline relevant information in writing as soon as possible including:
 - Name of the person making the allegation and contact details
 - Factual details about the allegation including names and positions of relevant individuals, what occurred, when it occurred and who was involved
 - Provide any supporting information or detail witnesses present
- The allegation will be reviewed and, where appropriate, fully investigated.

- The Whistleblower will receive an acknowledge of the reported allegation in writing within 5 days of the disclosure with an indication of the steps being taken (for example investigation, potential duration, support mechanisms)
All details will be stored confidentially and in line with GDPR legislation

APPENDIX 1

Safeguarding Adults Report Form

To be completed as fully as possible if you have concerns regarding an adult.

If it is safe to do so, it is important to inform the adult about your concerns and that you have a duty to pass the information onto Designated Safeguarding Officer and Management Lead for Safeguarding.

Section 1 – Details of adult (you have concerns about)	
Name of adult	
Address	
Date of Birth/ Age	
Contact number	
Emergency contact if known	
Consent to share information with emergency contact?	
Section 2 – Details of the person completing this form/ Your details	
Name	
Contact phone number(s)	
Email address	
Line manager or alternative contact	
Name of organisation / club	
Your Role in organisation	
Section 3 – Details of concern	
Please explain why you are concerned. Please give details about what you have seen/been told/other that makes you believe the adult is at risk of harm or is being abused or neglected (use the chronology below to include dates/times/evidence from records/photos etc.)	
Date/ Time	What happened

Section 5 – Details of the person thought to be causing harm (if known)	
Name	
Address	
Date of Birth/Age	
Relationship/connection to adult	
Role in organisation	
Do they have contact with other adults at risk in another capacity? E.g. in their work/family/as a volunteer	
Section 6 - Have you discussed your concerns with the adult? What are their views, What have they stated about what they want to happen and what outcomes they want?	
Section 6A – Reasons for not discussing with the adult	
Discussion would put the adult or others at risk. Please explain:	
Adult appears to lack mental capacity. Please explain:	
Adult unable to communicate their views. Please explain:	

Section 7 – Risk to others	
Are any other adults at risk Yes/No/Not known – delete as appropriate If yes please fill in another form answering questions 1-6	
Are any children at risk Yes/No/Not known Delete as appropriate If yes please fill in a Safeguarding Young People Report Form and attach to this.	
Section 8 – What action have you taken if any /agreed with the adult to reduce the risks?	
Actions by club: e.g. person causing harm suspended, session times changed.	
Section 9: Other agencies contacted	Who contacted/reference number/contact details/advice gained/action being taken
Police	
Ambulance	
Other – please state who and why:	
Section 10: Contact with Welfare Officer/others within the club	
Who else has been informed of this issue? – and what was the reason for information sharing	
Consultation with Safeguarding Lead	Dates and times
Completed Form copied to Safeguarding Lead; Date and time	
Signed:	
Date:	

OFFICE USE ONLY

Section 11 – Sharing the concerns (To be completed by Designated Safeguarding Officer or Management Lead for Safeguarding)






Details of your contact with the adult at risk of harm. Have they consented to information being shared outside of The Quay Climbing Centre?

Details of contact with the Local Authority Safeguarding Team/MASH where the adult at risk of harm lives – advice can be still sought without giving personal details if you do not have consent for a referral.

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