



QPR Safeguarding Policy and Commitment to Safeguarding Adults at Risk

Policy Statement

QPR are committed to Safeguarding and protecting the welfare of Adults at Risk (AAR). Safeguarding is everyone's responsibility and Adults at Risk should feel safe at all our activities.

The Club seeks to ensure the safety of all those who engage with, and come into contact with us, and expects all staff, players, volunteers, participants, contractors and guests to share this commitment.

The Club has nominated a Senior Safeguarding Manager (SSM), Mark Donnelly. The Senior Safeguarding Manager sits on the Board and champions Safeguarding at Board level. The Senior Safeguarding Manager will,

- 1) Attend internal Safeguarding strategic meetings.
- 2) Ensure the Club has appropriate policies in place in respect of identifying / reporting concerns or disclosures.
- 3) Attend Senior Safeguarding Manager training delivered by EFL.
- 4) Ensure footballing authorities, EFL and FA Safeguarding team, are informed of any reportable cases as appropriate.

Aims and Scope of the Safeguarding Adults at Risk Policy

The Safeguarding Policy for Adults at Risk demonstrates the commitment to Safeguarding and protecting all vulnerable people it comes into contact with.

QPR recognises that every Adult at Risk is potentially at risk of abuse, and is committed that all adults that come into contact with the Club and Trust have a right to be protected from any form of abuse, bullying or exploitation. The aim of this Safeguarding Policy is to ensure that any Adult at Risk is in a safe and secure environment, that any form of abuse is identified, investigated and measures put in place to remedy it. The Policy also provides guidance to staff and volunteers regarding the expectations of them within a

Safeguarding remit and what to do if a Safeguarding issue is suspected. There are also details of support agencies and sources of information or guidance.

The specific aims (although not exhaustive) are:

- To safeguard all Adults at Risk who interact with the Club and Trust.
- To demonstrate best practice in the area of Safeguarding Adults at Risk.
- To increase awareness and understanding of Safeguarding issues across the Club.
- To provide guidance to understand reporting procedures.
- To encourage a partnership between the Club and Trust, carers or relatives of Adults at Risk. associated with the Trust
- To ensure that coaches, parents, participants and other adults who come into contact with Adults at Risk provide good role models of behaviour.
- To promote high ethical standards throughout the Club and Trust

This Policy is intended to be for staff, volunteers, Trustees, parents, carers and individuals with whom the Club interacts. The Policy should assist all staff and volunteers and provide them with the information and framework to enable them to fulfil their Safeguarding protection responsibilities as employees of the Trust. The Policy provides advice to external agencies and resources should they be required and also gives clear direction as to how to report or raise awareness of any concerns or potential reportable incidents.

This Policy also identifies key individuals in positions of responsibility within the club who are there to assist or report concerns to.

Scope

This Policy applies, but is not limited to, the following activities undertaken at the following locations are under the remit of this Policy including:

- QPR in the Community Trust Soccer Schools
- QPR matches and QPR events
- Facilities and matches at Harlington training ground
- QPR in the Community Trust activities at schools and all other venues etc.
- All projects delivered by QPR in the Community Staff and coaches including but not limited to Kicks projects, Multi-Sport, Health, Fitness and Disability programs
- QPR ladies /girls teams (whether directly delivered or via an agreed Service Agreement and license with external coaches.

Copies of the Policy are available via the Trust's website and will be made available to all employees. All employees and workers are made aware of the Policy and procedures through induction and where appropriate their work with Adults at Risk will be supported by a comprehensive ongoing Safeguarding training program. All employees are also aware of other Trust and Club policies and procedures such as the Staff Handbook, Complaints Policies and Procedures and also the Club's Health and Safety Policies.

Approved and Endorsed by:

Signature	Date

SAFEGUARDING DEFINITIONS

Adults at Risk of Harm

A person aged 18 or over who has needs for care and support (whether or not the local authority is meeting any of those needs), and

Is experiencing, or at risk of abuse or neglect, and

As a result of those needs is unable to protect themselves from either the risk of, or experience of, abuse or neglect.

This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include domestic violence.

Safeguarding Adults at Risk is Defined as:

- 1) Protecting Adults at Risk from maltreatment.
- 2) Preventing impairment of Adults at Risk, health or development.
- 3) Ensuring that Adults at Risk are provided with safe and effective care.
- 4) Taking action to enable all adults at risk to have the best life chances.

This policy covers any adult when, due to mental or physical capability or their own circumstances, an individual may be vulnerable or considered at risk.

Club Safeguarding Resources

The Trust has employed a trained and experienced Safeguarding Manager (SM) who works across the Club.

The Safeguarding Manager is supported by Designated Safeguarding Officers (DSOs). The Designated Safeguarding Officer will be on hand to support and assist all staff in identifying and dealing with potential Safeguarding issues. The Designated Safeguarding Officer will ensure that the Safeguarding Manager is immediately notified of all potential Safeguarding issues and concerns, to make sure that appropriate action is taken.

Safeguarding Manager (SM) Responsibilities

The Safeguarding Manager will

- Manage the implementation of the action and implementation plan for Safeguarding.
- Ensure compliance with statutory obligations under relevant legislation.

- Work closely with HR to develop and implement safer recruitment and induction practices across the organisation.
- Continuously work to maintain, embed and improve QPR Safeguarding provision ensuring the highest standards for Safeguarding vulnerable groups.
- Manage the development, implementation, promotion and review of all Safeguarding Adults at Risk policies, practices and good practice guidelines.
- Be the lead member of staff to manage Safeguarding incidents, concerns and allegations.
- Be the lead member of staff to work in partnership with statutory and football authorities, sharing information where appropriate to Safeguard vulnerable groups.
- Maintain accurate, confidential and up to date records on all Safeguarding incidents, concerns and allegations.
- Give direction and guidance to staff in respect of Safeguarding incidents, concerns and allegations.
- Support staff to respond appropriately to concerns about the welfare or safety of vulnerable groups. Ensure staff understand their individual responsibilities to Safeguard and promote the welfare of vulnerable groups.
- Lead and provide direction to the Designated Safeguarding Officer(s), and act as a mentor to identify potential issues and encourage reporting of all concerns.
- Ensure that Designated Safeguarding Officers are adequately trained, supported and supervised.
- Develop relationships with statutory and football authorities.
- Attend regular Safeguarding training and maintain an up to date knowledge base of relevant legislation, regulations and best practice.

The Safeguarding Manager is Janet Barr and her contact details are as follows:
Janet.barr@qpr.co.uk 0208 740 2572

Designated Safeguarding Officer (DSO) responsibilities

The Designated Safeguarding Officer(s) will

- Support the Safeguarding Manager to proactively promote and raise Safeguarding awareness.
- Attend all Safeguarding meetings and ensure best practice is shared throughout the Trust and also with the Club and the Club's Academy.
- Ensure all Trust staff understand their individual responsibilities to Safeguard and promote welfare of Adults at Risk.
- Advise others working with Adults at Risk on the implementation of policies and procedures around Safeguarding.
- Support colleagues to respond appropriately to concerns about Adults at Risk welfare or safety
- Assist Safeguarding Manager to maintain accurate and confidential information and to meet regularly to ensure Safeguarding standards are upheld across the Trust.
- Ensure that Safeguarding issues are raised and dealt with at all Trust Senior Manager Team meetings with the appropriate escalation and communication protocols in place for the Trustees and the wider Club management.

Designated Safeguarding Officers contact details are below:

Claire Priddle (TRUST)	claire.priddle@qpr.co.uk	0203 198 7124
Rob Nicoll	robert.nicoll@qpr.co.uk	0203 198 7126

Equality and Diversity

All Adults at Risk have a right to be safe and to be treated with dignity and respect, and with a right to privacy.

All Adults at Risk, whatever their age, culture disability, gender, language, racial origin, religious belief and/or sexual identity, have the right to protection from abuse, whether it is physical, sexual, psychological, financial/material, domestic abuse, modern slavery, discriminatory, organisational, neglect/acts of omission or self-neglect .

Safeguarding Training and Resources

Training and access to appropriate resources is integral to the ongoing Safeguarding provision at the Trust. The following are key elements of this.

- A Safeguarding induction is provided to all new staff. This is delivered by the Safeguarding Manager or appropriate Designated Safeguarding Officer.
- A briefing document and guidance for safer working practices will be provided and will also be available on the intranet, under the Safeguarding page.
- In addition to this, regular Safeguarding Workshops are held for all Trust and Academy staff (at least quarterly)
- The Safeguarding Manager is always contactable and holds a regular drop in 'Safeguarding surgery' so staff can discuss any concerns they may have in confidence.
- All staff working in direct contact with Adults at Risk are required to complete the FA's 3 hour Safeguarding Awareness Workshop and undertake a refresher course, at least once every 3 years. Details of those satisfactorily completing this course are retained by the Human Resources Department.

Recruitment

QPR has a robust Safer Recruitment/Working with ex-Offenders Policy which sets out in detail the process that will be undertaken to ensure staff are suitable to work with Adults at Risk. In particular, this Policy outlines how the Club will manage the recruitment of ex-offenders, the management of any DBS content and the decision making process. This Policy is available on the intranet or upon request from the Safeguarding Manager or the HR Manager. The Designated Safeguarding Officer will be responsible for overseeing safe recruitment within their areas of responsibility, working closely with the HR Manager. Safe recruitment will include DBS checks, detailed references and other vetting as required. The HR Manager keeps personnel files for each employee and this includes employment checks and records.

The Trust has a specific work strand aiming to improve the employability of ex-offenders and has a specific Policy designed to ensure the safe recruitment of ex-offenders.

Checks - DBS

Staff in roles that require contact with Adults at Risk will undergo enhanced DBS disclosure, which is an on-going procedure throughout their association with the Trust. Enhanced DBS checks will enable the Trust to undertake more thorough recruitment and selection procedures for positions which involve working with vulnerable adults.

The Safeguarding Framework - Rules, Regulations and Guidance

QPR Safeguarding practices are governed by the legislation and rules/regulations set out by several key governing agencies including the Government, Local Authorities, Police, the Charities Commission, the Football Association (FA), the Premier League (PL) and Football League (EFL) and the NSPCC Child Protection in Sport Unit.

The content of this document has been developed with reference to policies and procedures of Affiliated Football, and the Affiliated Football Safeguarding Policy, the FA, PL and EFL Safeguarding Guidance. This policy is underpinned by the following legislative documents and policies which apply to Safeguarding children as well as Adults.

- Safeguarding Vulnerable Groups Act (2006)
- Protection of Freedom Act (POFA) (2012)
- Female Genital Mutilation Act (2013)
- Keeping Children Safe in Education (2015) (Updated version effective September 2016)
- Sexual Offences Act (2003)
- The Mental Capacity Act (2005)
- The Care Act (2014)
- Human Rights Act 1998
- No Secrets 2000
- Information Sharing (Advice for Practitioners)
- The Club/ Trust recognises its responsibilities to maintain regular communication with the Local Authority and, in particular, the Tri-Borough Local Safeguarding Adults Board (LSAB) along with the LSAB of neighbouring London boroughs. Regular contact and co-operation is also made with the Local Authority Services, Local Authority Designated Officer and the Police Safeguarding Teams.

The communication between the Club and the Local Authorities focuses on supporting the Trust with:

- Reporting/monitoring of Safeguarding incidents.
- Sharing of best practice.
- Sharing information/changes in legislation.
- Sharing of important local area information and workforce best practice.
- Training and development.

- Any other relevant appropriate Safeguarding support.

Staffing Ratios

Any activity undertaken by the Club and Trust will always consider the appropriate number of staff members required, depending on the age of the participants involved, the degree of risk the activity involves, and whether there are any additional disability needs. The needs of participants, the potential risk inherent within an activity, and the level of assistance needed for participants will determine the number of staff required.

Regardless of these ratios, a minimum of 2 members of staff or delivery partner must always be available to supervise an activity with Adults at Risk. A session should not be run if there is only 1 member of staff in attendance. This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the activity (e.g. in the event of a participant requiring the attention of an adult during the activity following an accident).

Venues

The Trust operates across a wide range of venues and delivers sessions at a number of partners. The Trust conducts a Health and Safety review and a full Risk Assessment at each new venue. Before each session, the Trust's employee, delivering the session, will conduct a further updated Risk Assessment. Whilst the Trust may enter into hire agreements or partnership agreements, the Terms & Conditions are clear that the Trust's Safeguarding Policies remain in place and take precedence over any other Safeguarding Policy or approach.

The Academy has its own Safeguarding Policy.

Image Policy

The Trust takes its guidance on the use of images from guidelines issued by the FA and PL/EFL. All Trust images are taken by Club officials who have been briefed by the member of staff (and where possible a Designated Safeguarding Officer or Safeguarding Manger) responsible for the activity being photographed/ filmed.

All Trust activities are expected to adhere to the following guidelines.

- Before taking images of Adults at Risk, consent is sought in writing at the start of each football season or prior to the event. Parents/legal guardians/carers are responsible for informing the Trust of any change of circumstances within the season which may affect consent.
- Parents/legal guardians/carers will be informed of how the image will be used. The Trust will not allow an image to be used for something other than that for which it was initially agreed.
- All individuals featured in Trust publications will be appropriately dressed.
- Where possible, the image will focus on the activity taking place and not a specific individual.
- Images should represent the broad range of people participating safely in the event.
- Designated Trust photographers will, where applicable, undertake a DBS check and have attended a Safeguarding workshop. Anyone employed by the Trust or

contracted to provide these services will be personally responsible for keeping up to date with the latest guidelines on the Use of Images Policies issued by the Trust and by the PL/ EFL from time to time. Trust or Club Identification will be worn at all times.

- Adults at Risk who are subject to family, care or legal proceedings, or who are under a court order will not have their images published in any Trust document.
- No images of Adults at Risk featured in Trust or wider Club publications will be accompanied by personal details such as their home address.
- Recordings of Adults at Risk for the purposes of legitimate coaching aids are only filmed by Club officials and are stored safely and securely at the Club's premises.

Missing Persons

Safeguards must be in place during each training session or Trust activity to be able to account for all vulnerable adults under the Trust's care and responsibility. A register and count of participants at the start and end of session will be taken and emergency contact numbers taken for each individual.

If an Adult at Risk is missing during a Trust event or activity, then the Trust staff/ volunteers will immediately search the vicinity and get in contact with the responsible adult to identify if the vulnerable adult is with them. If this initial response is not successful then the Police should be contacted as soon as possible as the early period is the most critical to successfully find a missing person. If the activity is at a location with CCTV and in-house security (including Loftus Road) then this should be reviewed as soon as possible.

Match Day Policies

QPR have a Match Day Safeguarding Policy.

Unaccompanied Adults

Any vulnerable adult should be accompanied to a match day at Loftus Road.

Whistleblowing Policy

As well as having robust measures in place to prevent abuse, and to provide a safe and secure environment, the Trust recognises that on occasions there may be incidents where these policies and safeguards are not followed. The Trust is committed to ensuring that any individual who is aware of any reportable incident should be encouraged and reassured that reporting such an incident will be taken extremely seriously and will not have any repercussions for the individual reporting it.

Whistleblowing refers to making a protected disclosure under the Public Interest Disclosure Act 1998. QPR have a Whistleblowing Policy to ensure that all issues are reported and investigated.

By encouraging a culture of openness, the Club and Trust want to encourage staff to raise issues which concern them at work. Staff have a right and duty to raise matters of

concern they may have about the services being offered by the Trust or serious malpractice associated with them. Staff may be worried that by reporting such issues they will be opening themselves up to victimisation or detriment, or risking their job security. However, all staff are protected by law if they raise concerns in the right way and the Trust will make sure that this is followed. Provided they are acting in good faith, it does not matter if they are mistaken. This policy is designed to ensure workers raise concerns properly and to ensure that mechanisms exist at the Trust to address issues raised quickly and effectively.

Concerns can be raised via a whistleblowing charity Public Concern at Work 0207 404 6609.

In addition to the above, the Club have a specific Safeguarding Whistleblowing hotline number for the reporting of any Safeguarding concerns; **0203 198 7086**.

As well as the internal whistleblowing process, individuals can also contact external agencies to report concerns or for wider advice. Any concerns around potential criminal activities should immediately be reported to the Police. Details of the wider agencies which can assist are within Appendix 5.

Trust employees or anyone involved in a Trust programme would be expected to report concerns or suspicions of any of the following activities (the list is not exhaustive);

- The committing of a criminal offence.
- Concerns over discrimination of any kind.
- Concerns about bullying behaviour.
- Any evidence or concerns about poor practice or inappropriate behaviour.
- Concerns about domestic issues which may be affecting a participant.
- Any evidence of abuse or concerns about potential abuse of any kind.

The Trust is committed that all concerns raised will be dealt with confidentiality, sensitively and with no detrimental impact on the individual raising the matter. The Trust will actively promote its Whistleblowing Policy so individuals are encouraged to report matters.

Dealing with Complaints

There is a Complaints Procedure which will be followed where an adult or carer raises a concern about poor practice. This may be where the threshold is not met for raising Safeguarding concerns. There is obviously a wide definition of potential abuse and poor practice.

The immediate priority in dealing with any complaint will always be the safety of any Adult at Risk involved. All complaints will be independently investigated and managed by senior staff, in consultation with HR and the Safeguarding Manager where appropriate. The findings of complaints will be notified to the individuals concerned. If any potential criminal activities are suspected then the Police and the relevant authorities will be notified and all information handed over to them. All employees and volunteers would be expected to fully co-operate with any investigation.

If the complaint identifies potential protection issues or Safeguarding issues, the Club/ Trust's Adults at Risk Protection Policies and Procedures will be adhered to.

If a complaint is made against a member of Trust staff or a volunteer working for the Trust, the complaint should be made to either the Safeguarding or HR Manager. If an individual does not wish to raise the complaint with the Club, they can approach an external agency identified in Appendix 5 to lodge their complaint and the agency will then investigate with the Trust and the wider Club.

Data and Information Sharing

The Trust and Club comply with the requirements of GDPR. Suitable records of any complaints or investigations carried out against any current or former employee or volunteer. The Safeguarding Manager will prepare regular reports to the CEO and the Club's COO on issues, complaints and investigations. These will be reported to the Trustees and the Club's Board as appropriate.

Service Level Agreements and Engagement of Contractors

Any organisation or individual who engages with the Club and Trust must comply with the commitment to Safeguarding and this will be outlined in any Partnership Agreements, Service Level Agreements or any other agreements that are in place with any service provider, or for commissioned services insofar as those services related to Adults at Risk.

Any Service Level Agreement will have details of Safeguarding contacts and references to our Safeguarding Policies and Procedures.

Safeguarding Records

All Designated Safeguarding Officers and the Safeguarding Manager should ensure that adequate Safeguarding records are kept securely. Any notes or evidence relating to a Safeguarding issue should be passed to the Safeguarding Manager. Safeguarding concerns relating to employees are kept securely.

Any Safeguarding data will be retained for up to 7 years. Any notes or evidence that is not required to be retained will be securely disposed of via the Club's confidential document disposal service.

Identifying and Dealing with Potential Issues

This policy covers all aspects of poor practice or abuse against Adults at Risk.

Definitions of Poor Practice and Abuse

Poor Practice is unacceptable and will be treated seriously with appropriate action. Any behaviour that contravenes existing Codes of Conduct, infringes an individual's rights and/or reflects a failure to fulfil the highest standards of care, is an indication of Poor Practice. An Adult at Risk may not be aware that poor practice or abuse is taking place, as they may deem the behaviour as acceptable.

What is abuse?

Abuse is any form of physical, emotional or sexual mistreatment, or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and

represents an abuse of power or a breach of trust. Abuse can happen to a child or an Adult at Risk regardless of their age, gender, race, ability, culture or sexual orientation.

Types of abuse

There are four main forms of abuse identified as follows, should you have any concern that abuse is occurring you should contact the Safeguarding Manager or Designated Safeguarding Officer for the relevant department for advice.

Physical Abuse:

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to an Adult at Risk.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a vulnerable person.

Physical abuse can be caused through an act or omission.

Sexual Abuse:

Sexual abuse involves forcing or enticing Adults at Risk to engage in sexual activity, regardless of 'implied consent'. This includes penetrative (penetration of vagina, anus and mouth) and non-penetrative acts (touching - over or under clothing, any part of the body in a sexual way).

Sexual abuse includes involving Adults at Risk in the watching of sexual acts, and encouraging them to engage in over-sexualised behaviour, and also grooming offences which can also be committed via the internet.

Sexual abuse can be perpetrated by anyone, including a parent or guardian, caregiver, extended family, friend, neighbour, stranger or a person in a position of trust (includes 16/17 year olds).

Neglect:

Neglect is the persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in the serious impairment of health or development. This includes failing to provide adequate nutrition, clothing, shelter, health care and protection from harm. Emotional neglect is the failure to meet a vulnerable adult's ongoing emotional needs for affection and a sense of belonging.

Emotional Abuse:

Emotional abuse is the persistent emotional maltreatment of an Adult at Risk such as to cause severe and persistent adverse effects on the individual's emotional development, including verbal attacks on their sense of self, repeated humiliation or rejection. Exposure to violence, drugs, alcohol abuse or severe conflict in the home, forced isolation, restraint or causing an individual to be afraid much of the time, may also cause emotional harm. Emotional abuse rarely happens only once and it is usually part of a pattern of how the individual is being treated over a significant period of time.

Bullying/ Cyberbullying (strand of emotional abuse)

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are

- physical - including intimidation and violence
- verbal - insults and threats
- emotional - psychological and implied threats designed to undermine or exploit vulnerability

Bullying can take place face to face, or via social media and other online forums. The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to vulnerable adults to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm). All settings in which Adults at Risk are provided with services, or are living away from home, should have in place rigorously enforced anti-bullying strategies.

Cyberbullying - this is a particular form of bullying when a person uses technology, i.e. mobile phones or the internet (social networking sites, chat rooms, instant messenger, and tweets) to deliberately upset someone. Bullies often feel anonymous from the incident when it takes place online and 'bystanders' can easily become bullies themselves by forwarding the information on.

Domestic Abuse

Is a significant indicator of harm to Adults at Risk, who may suffer directly or indirectly if they live in households where there is domestic abuse Domestic abuse is likely to have a damaging effect on the health and development of Adults at Risk.

CAPACITY

Capacity refers to an individual adults' ability to take a specific decision or take a particular action at a particular time even if they are able or not able to make decisions at other times. The starting point should be that the person has capacity to make a decision unless it can be established otherwise.

Signs and Symptoms of Potential Abuse

The list below is not exhaustive and the presence of one or more of these indicators is not proof that abuse is taking place, though they are indicators that abuse may have taken place:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if on a part of the body not normally prone to such injuries.
- An injury for which the explanation seems inconsistent.
- Disclosure of what appears to be an abusive act.
- Disclosure of unsatisfactory home circumstances i.e. domestic abuse, drugs and alcohol misuse, mental health concerns of a parent or other person within the home.
- Someone expresses concern about the welfare of the individual.
- Unexplained changes in behaviour (e.g. becoming quiet, upset, withdrawn or sudden outbursts).
- Oversexualised behaviour.
- Displays variations in eating patterns including overeating or loss of appetite.
- Weight loss for no apparent reason.
- Becomes increasingly dirty or unkempt.
- Evasive parents/carers.
- Signs of self-neglect should also be acted on.

It is not the responsibility of staff (permanent or casual) or volunteers to decide if abuse has taken place, but it is their responsibility to act on any concerns, in accordance with this procedure.

What to do if Abuse or Poor Practice is Suspected

All staff or volunteers have a responsibility to ensure the safety and welfare of Adults at Risk and to take appropriate steps to ensure that suspicions and allegations of abuse are taken seriously and responded to quickly and appropriately. It is their responsibility to report issues and not to decide or judge whether any abuse has taken place.

The first priority in Safeguarding should always be to ensure the safety and welfare of the individual. If concerns arise, best practice would be to gain the consent of the Adult at Risk (if they are able to give it) before making a referral to another agency. However, in the cases listed below referrals **must** be made without that consent:

- The person is at risk of harm.
- Other people are, or may be, at risk of harm.
- Emergency/life threatening situations may warrant information sharing with emergency services.
- A serious crime has been committed.

If anyone associated with the Club is concerned about the safety or welfare of an Adult at Risk or are concerned about someone's behaviour towards an Adult at Risk, they **must act**, doing nothing is not an option.

DO NOT ASSUME THAT SOMEONE ELSE WILL HELP THE ADULT AT RISK. Safeguarding is everyone's responsibility. You must report your concerns to Safeguarding Manager or one of the Designated Safeguarding Officers as soon as possible.

Responding to a Safeguarding Complaint

Adults who may be vulnerable are likely to disclose abuse or neglect to someone they trust, so correct handling is crucial. The following points are relevant for individuals speaking to a potential Safeguarding complainant.

- 1) Deal with it as it happens; ensure the Adult at Risk needs are met, and that they feel supported.
- 2) It is not your job to investigate what happened, put your feelings aside and listen carefully.
- 3) Allow the individual to talk freely, reassure them they have done nothing wrong.
- 4) Ask open questions, don't lead the vulnerable adult.

Staff Conduct

The Trust has a Code of Conduct for staff members (Appendix C), which should be adhered to at all times. Staff should ensure they maintain healthy, positive and professional relationships at all times with participants; this also applies to online communications. Staff should not engage in relationships with participants. Please note that as from

November 2017 it is now illegal for sports coaches to have relationships with 16 and 17 year olds under their care.

Managing Allegations Against Employees, Volunteers or Contactors

Should a concern arise about an employee, worker or volunteer's conduct in relation to an Adult at Risk, this should be reported to the Safeguarding Manager. The Safeguarding Manager will take the necessary steps to ensure the safety of the individual. The reporting form (Appendix 1) should be completed.

The Safeguarding Manager will then follow the following process:

- 1) The allegation will be referred to the Local Authority Designated Officer (LADO) and/or Police.
- 2) Any parent/carer of the vulnerable person will be contacted as soon as possible following advice from statutory agencies.
- 3) Any action that needs to be taken against the individual will be taken - this will include suspension pending an investigation, if there is sufficient cause for concern.

Where there is a complaint against a member of staff the one of the following may occur:

- A criminal investigation led by the Police.
- A child protection investigation led in a multi-agency approach by the Local Authority.
- A disciplinary or misconduct investigation led by the Club, which may also involve the FA or PL/EFL.
- The Club will delay an internal disciplinary or misconduct investigation while a criminal or Local Authority investigation takes place.
- Should any member of staff feel that a Safeguarding concern has not been properly addressed they should complain directly to their line manager or to the safeguarding team at the FA.

If a member of staff suspects abuse is taking place, or a report/allegation of abuse has been disclosed to them, where possible, the Safeguarding Manager or a Designated Safeguarding Officer should be contacted as early as possible. However, it is recognised that an individual may need to respond to a situation immediately, and prior to such contact. If the nature of the suspicion or report is putting the Adult at Risk concerned in immediate danger. The Safeguarding Manager will notify the LADO and consult with the Police and Local Authority Social Care as appropriate.

Useful contact details are listed at the end of this policy.

The following guidelines offer help and support in responding to abuse or a suspicion of abuse:

Staff should:

- Listen carefully rather than question the individual directly.
- Stay calm and not offer their personal opinions/thoughts.
- Be aware that medical or criminal evidence may be relevant.

- Tell the individual that you are listening and taking what they say extremely seriously.
- Seek medical attention if necessary.
- Take further action - they may be the only person in a position to prevent future abuse.
- Inform the Designated Safeguarding Officer and/or the Safeguarding Manager of the information or another senior member of staff if these are not available.
- Write down everything said (in their words as far as possible) and what was done - accuracy and detail is important. Keep this information stored in a secure place. Concerns can be recorded on the Safeguarding Reporting Form.

Complaints Procedure

The Trust has a Complaints Procedure which will be followed where an adult carer raises a concern about poor practice. The procedure and process is shown on a flow chart at Appendix 2.

QPR In the Community Trust has a Code of Conduct which it expects all staff and volunteers to adhere to at all times. It can be found at Appendix 3.

Specific Concerns Around Radicalisation and Extremism

The Counter Terrorism and Security Act places a duty on specified authorities, including sport in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). There is also a duty on local authorities to ensure there is a Channel Panel in place. This must include the Local Authority and senior police officers. The panel will assess to what extent identified individuals are vulnerable to being drawn into terrorism. The Act requires partners of the Channel Panel to co-operate with the Panel in the carrying out of its functions and the police in undertaking the initial assessment as to whether a referral is appropriate. Trust staff will be trained in this area so that staff across the Trust can identify signs and are aware of the correct referral pathways. All Trust staff should notify the Safeguarding Manager if they have any concerns.



Safeguarding Reporting Form

Please complete within 24 hours and send to the Safeguarding Manager (Janet.Barr@qpr.co.uk) or in her absence to any Designated Safeguarding Officer

All concerns involving Community Trust activities Claire.priddle@qpr.co.uk

Date of concern:	
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Details of the person who is raising the concern

Name	
Role	
Name of venue	
Telephone number	
Email	

Details of the person you are raising a concern about

Name	
Role (please circle)	Adult at risk Member of staff Volunteer Other
Date of birth	

Home address	
Telephone number	
Email	

Details of the parents/carers (if applicable)

Name (s)	
Address	
Telephone number	
Email	

Nature of the concern

Circumstances (Include ALL of the information known to you)	
Details of any disclosures (Include ALL of the information known to you, including any verbatim comments)	
Injuries seen	

Witnesses (include full details, including name, role and contact details)	
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Confidentiality

If the allegation is against a member of staff or volunteer, that person should not be informed of the concern until advice has been sought from the Safeguarding Manager.

Have the parents/ carers been informed of the concern? (please circle)	Yes	No
If not, please state why (If you feel sharing the information with the parent/carer will place the child at risk, you should not share this information. Advice should be sought from the Safeguarding Manager and reasons fully documented. Adults at risk need to be informed of the concern).		
When were the parents/carers informed of the concern?	Date/Time	
Have the parents/ carers or adult at risk given consent to share information?	Yes	No
If not, why?		

Details of the person alleged to have caused harm (if applicable)

Name	
Role (please circle)	Child Adult at risk Member of QPR staff - further detail required Volunteer Parent Other, please detail
Date of birth	
Address	
Telephone number	
Email	
Do they work/ volunteer anywhere else? (please circle)	Yes No
If yes, please detail	

Actions

What has been done about the concern?	
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Who has been informed about the concern? (please circle)	Safeguarding Manager Safeguarding officer (please name) FA/Premier League Police Children's social services Local authority designated officer Other, please detail
When were they notified?	
What was the name of the person you spoke to?	
What did they say?	
What other actions have been taken?	

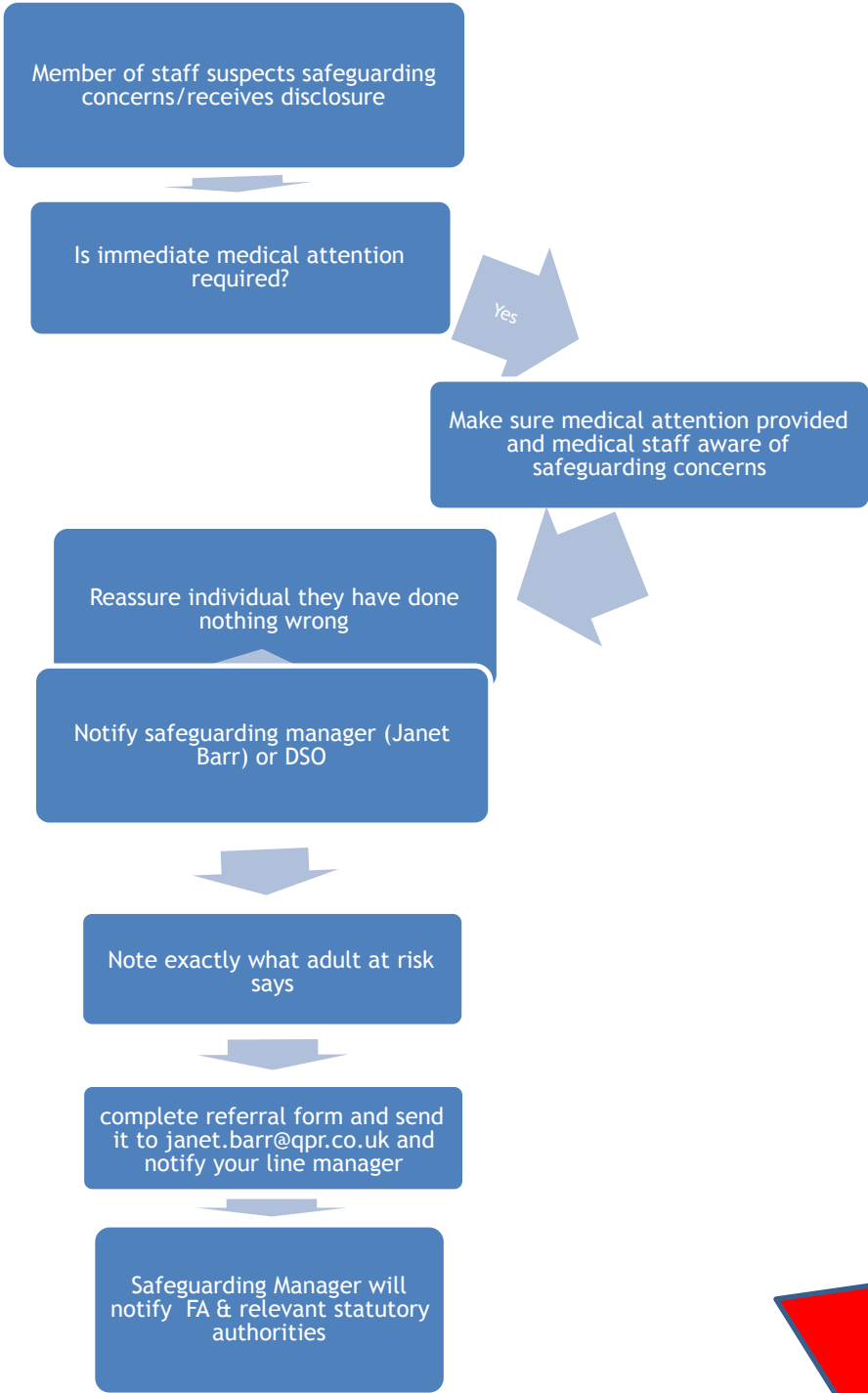
If your concern relates to a sexual assault that has taken place within the last 7 days, you must notify the Safeguarding Manager and the Police at the time you are advised.

If your concern relates to immediate welfare of a child or Adult at Risk call the police on 999. The Safeguarding Manager should then be notified.

Safeguarding Manager

Janet Barr Janet.barr@qpr.co.uk 07880 204 366

HOW TO DEAL WITH SAFEGUARDING CONCERNS:



Remember - if there is immediate danger dial 999

Remember - if there is immediate danger dial

Appendix 3

Codes of conduct for all staff and volunteers

All Community Trust Staff have a responsibility to be a positive role model for all individuals particularly adults at risk, and should all adhere to the Safeguarding Code of Conduct

Code of Conduct

- Ensure the safety of all Adults at Risk by providing effective supervision, proper pre-planning of coaching sessions, using safe methods at all times.
- Consider the wellbeing and safety of participants before the development of performance.
- Encourage and guide participants to accept responsibility for their own performance and behaviour.
- Treat all people fairly and ensure they feel valued.
- Encourage all children, young people and Adults at Risk not to discriminate on the grounds of religious beliefs, race, gender, social classes or lack of ability.
- Not allow any dangerous play, bullying, or the use of bad language or inappropriate behaviour.
- Appreciate the efforts of all young people and not over-train the young people. Never exert undue influence over performers to obtain personal benefit or reward.
- Be positive, approachable and offer praise to promote the objectives of the Trust at all times.
- Not let any allegations of abuse of any kind or poor practice go unchallenged or unrecorded. Incidents and accidents to be recorded in the line with the Trust's procedures. Parents will be informed.
- Never use sanctions that humiliate or harm Adults at Risk.
- Report accidents or incidents of alleged abuse or poor practice to the Trust Safeguarding Manager or a Trust Designated Safeguarding Officer.
- Administer minor first aid in the presence of others and, where required, refer more serious incidents to the Trust "first aider".
- Have access to telephone for immediate contact to emergency services if required.
- Refrain from smoking/consuming alcohol around any children, young people or Adults at Risk

Appendix 4

Safeguarding Definitions

Key Safeguarding Terminology and Definitions:

The Club - refers to Queens Park Rangers Football Club (QPR), its staff and all activities it undertakes. In certain circumstances it may also refer to third parties with an entrusted responsibility for delivering club-supported activity.

The Trust - refers to Queens Park Rangers in the Community Trust, its staff and all activities it undertakes. In certain circumstances it may also refer to third parties with an entrusted responsibility for delivering club-supported activity.

The Academy - refers to the Academy department within the Club responsible for nurturing and developing the Club's future generations of players. The Academy is based at an independent site external to the Club's Loftus Road Stadium.

The Training Ground - The Club's external training centre at which day-to-day training and administration of the Club's First and U23 teams takes place.

Staff - refers to persons employed by and receiving payment for services from the Club or Trust. This is irrespective of the length or nature of their contract.

Volunteers - Persons who freely offer their skills and expertise or take part in a task, event or enterprise with the Club or Trust at their own expense in terms of time and/or resources.

Child - a person who has not reached their 18th birthday and includes the term young person to denote someone who is 16 plus. Young person can be extended to cover individuals over 18 and should not be considered a legally defined age.

Adult at Risk - An adult (person aged 18 or over) who is, or may be in need of one of the following services: Health care; relevant personal care; social care work; assistance in relation to general household matters by reason of age, illness or disability; relevant assistance in the conduct of their own affairs (due to age, illness or disability in prescribed circumstances)

Safeguarding - Preventative and reactional measures taken by the Club and Trust to ensure the risk of harm or mistreatment to the welfare of vulnerable groups is minimalised; the health or wellbeing of vulnerable groups is not impaired when engaging in Club or Trust related activities; an environment exists that allows vulnerable groups to be cared for safely, and allows for the best possible outcomes for them and provides them with the best life chances possible.

Welfare - The health, happiness and fortunes of an individual and the humanitarian aspects of their life including personal need and physical and mental development.

Significant Harm - The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

Section 47(1) of the Children Act 1989 states that:

Where a local authority have reasonable cause to suspect that a child who lives, or is found, in the area and is suffering, or is likely to suffer, significant harm, the authority shall make, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare.

Child Protection - The process of protecting individual children identified as either suffering, or likely to suffer significant harm as a result of abuse or neglect. It involves measures and structures designed to prevent and respond to abuse and neglect.

Abuse - involves acts of commission and omission, which results in harm to an individual. The four types of abuse are physical abuse, sexual abuse, emotional abuse and neglect.

Appendix 5

Key Contacts or Useful Information

- EMERGENCY CONTACT DETAILS listed below ;
- HAMMERSMITH & FULHAM CHILDRENS SERVICES 0208 753 5600
- EMERGENCY DUTY TEAM 0208 748 8588
- HAMMERSMITH & FULHAM ADULT SOCIAL SERVICES 0845 313 3935
- LADO Kate Goodridge kgoodridge@westminster.go.uk
- Should you require police assistance call 101 or 999 in an emergency
- Whistle blowing (Public concern at work) 0207 404 6609)

Should any further help or advise be required please contact

- FA CASE MANAGEMENT TEAM Stefania Sacco - Stefania.Sacco@thefa.com
- County welfare officer Phil.Rendell@londonfa.com
- Child protection advisor EFL - Alex Richards
- OR EFL Trust 01772 325954 DSO for EFL Trust - Claire Taylor
- NSPCC 24 HOUR HELPLINE 0808 800 5000