



Adults at Risk Safeguarding Policy

QPR in the Community Trust Commitment to Safeguarding Adults at Risk

Statement from the Trustees

QPR in the Community Trust (the Trust) is committed to safeguarding the welfare of adults at risk. The Trust will work alongside QPR FC (the Club) to ensure the safety of all those who engage with and come into contact with the Trust. The Club and Trust expect all staff, players, volunteers, participants, contractors and guests to share this commitment.

The Club and Trust believe that all staff, players, volunteers, participants, contractors and guests have a responsibility to report any concerns to the Club should they be concerned about the welfare of any adult at risk.

The Club and the Trust are committed to ensuring that:

- The safety and welfare of adults at risk under the care of the Trust is paramount.
- All adults at risk who engage with the Trust, regardless of age, culture, social background, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to safety and protection from abuse or harm.
- All suspicions, reports and/or allegations of abuse will be taken seriously and investigated thoroughly which may involve the appropriate local authority teams where necessary.

The club employs a trained Safeguarding Manager who works across the Club and Trust and works with designated safeguarding officers who implement, maintain and monitor best practice across the Club and Trust.

The Trust have a Safeguarding officer Claire Priddle Claire.priddle@qpr.co.uk

This safeguarding policy is applicable to the current season and is subject to ongoing review at least once a year.

Policy Reviewed 1st September 2019

Next Review 31st August 2020

The Safeguarding policy and its accompanying procedures will be reviewed, approved and adopted by or on behalf of the Board at least once annually and whenever:

- a) There is a change in safeguarding legislation;
- b) The CCO implements a new activity or service which involves contact with children and/or adults at risk;
- c) There is a safeguarding incident within the CCO or which directly concerns or affects the CCO;
- d) Following significant organisational change.

The Board have appointed a Senior Safeguarding manager, Mohammed Khaliel (mkhaliel@gmail.com) who sits on the Board and champions Safeguarding at Board level. The Senior Safeguarding Manager will

- 1) Provide leadership at internal Safeguarding strategic meetings at least quarterly
- 2) Ensure the club has appropriate policies in place in respect of identifying / reporting concerns or disclosures
- 3) Attend SSM training delivered by EFL
- 4) Ensure footballing authorities, EFL / EFL Trust and FA safeguarding team are informed as appropriate
- 5) Together with DSOs and safeguarding manager ensure all staff / volunteers have appropriate level of DBS checks
- 6) Together with DSO and safeguarding manager identify safeguarding training needs and identify resource to support training

Aims of this Policy

- To safeguard all adults at risk who interact with the Trust
- To demonstrate best practice in the area of safeguarding adults at risk
- To increase awareness and understanding of safeguarding issues across the Club and the Trust
- To provide guidance for parents and carers in understanding reporting procedures
- To encourage a partnership between the Club and the Trust and the parent and/or carers of adults at risk who have dealings with the Club and Trust
- To ensure that coaches, parents, participants and any 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.

Key Safeguarding Terminology and Definitions:

The Academy – refers to the academy department within the club responsible for nurturing and developing the club's future generations of players (children from 8-18). The Academy is based at an independent site external to the club's Loftus Road Stadium.

Policy Reviewed 1st September 2019

Next Review 31st August 2020

Adult at risk – an adult (person aged 18 or over) who is, or may be, in need of one of the following services: healthcare; relevant personal care; social care work; assistance in relation to general household matters or their own affairs by reason of age, illness or disability.

Child – defined in the Children Act (1989) as any person under the age of 18.

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.

Safeguarding – preventative and reactional measures taken by the Club and the Trust to ensure the risk of harm or mistreatment to the welfare of adults at risk is minimised, the health or wellbeing of adults at risk is not impaired when engaging in Trust related activities, an environment exists that allows participants to be cared for safely and allows for the best possible outcomes for them and provides them with the best life chances possible.

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.

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

The Training Ground – the club’s external training centre at which day to day training and administration of the Club’s first & U23 teams takes place.

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

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

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

Rules, Regulations and Guidance

The Club and the Trust are governed by the legislation and rules/regulations set out by several key governing agencies including the Government, the Football Association (FA), the Premier League (PL) and the English Football League (EFL). The content of this document has been developed with reference to the policies and procedures of Affiliated Football, the Affiliated Football Safeguarding Policy, The FA, PL and EFL Safeguarding Guidance and is underpinned by the following legislative documents and policies.

- Working Together to Safeguard Children (2015)
- The Children Act (1989 and 2004)
- What to do if you’re worried a child is being abused - advice for practitioners (2015)
- Safeguarding Vulnerable Groups Act (2006)
- Protection of Freedoms Act (POFA) (2012)
- Female Genital Mutilation Act (2015)
- Keeping Children Safe in Education (2015) (Updated version effective September 2016)

Policy Reviewed 1st September 2019

Next Review 31st August 2020

- Sexual Offences Act (2003)
- UN Convention on the Rights of The Child(1989)
- The Mental Capacity Act (2005)
- The Care Act (2014)
- Every Child Matters 2003
- Human Rights Act 1998
- No Secrets 2000
- Standards for Safeguarding and Protecting Children in Sport 2005 NSPSS and CPSU

The Club and the Trust recognise their responsibilities to maintain regular communication with the Tri-Borough (LB of Hammersmith and Fulham, LB of Kensington and Chelsea, City of Westminster) Local Safeguarding Children Board (LSCB) along with the LSCB of the neighbouring London boroughs, local authority Children’s services, local authority Designated Officers and the Police safeguarding teams.

The communication of the Club and the Trust with the local authorities is centred upon supporting the Club and 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 and any other relevant appropriate safeguarding support.

The Trust will ensure that any partner agencies also have robust safeguarding policies and procedures in place and where appropriate there will be a Service Level Agreement which sets out the respective requirements and policies required.

Key Individuals and their Responsibilities

Club Safeguarding Manager Janet Barr

The Club Safeguarding Manager has responsibility to oversee and direct the safe provision of all activities and associated training relating to children, young people and adults at risk. It is a strategic role providing leadership and guidance on all safeguarding matters and relevant legislation, along with implementing safeguarding awareness and best practice club across the Club, the Academy and the Trust.

The Safeguarding Manager will

- manage the implementation of the Club and the Trust’s strategy, action and implementation plan for safeguarding;
- ensure compliance with statutory obligations under relevant legislation and the Affiliated Football Safeguarding Policy;
- work closely with human resources and heads of departments to develop and implement safer recruitment and induction practices across the Club and the Trust;
- continuously work to maintain, embed and improve the and Club and the Trust’s safeguarding provision ensuring the highest standards for safeguarding vulnerable groups;
- manage the development, implementation, promotion and review of the Club and the Trust’s safeguarding vulnerable groups’ policies, practices and good practice guidelines;

Policy Reviewed 1st September 2019

Next Review 31st August 2020

- be the lead member of staff to manage and investigate 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;
- lead and provide direction to Safeguarding Officers;
- ensure that Safeguarding Officers are trained, supported and supervised;
- act as the Trust and Club's lead source of safeguarding support, advice and expertise;
- ensure staff understand their individual responsibilities to safeguard and promote the welfare of vulnerable groups;
- 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;
- undertake the annual LSCB section 11 audit (Children Act 2004) and present the findings and take any relevant action.

Designated Safeguarding Officer (DSO)

The DSOs support the Club Safeguarding Manager to proactively promote and raise safeguarding awareness and assist with responding appropriately to safeguarding concerns and allegations. DSOs are based in strategic positions within the Trust and across the Club.

The Club and the Trust will ensure that suitable policies and practices are in place to ensure that staff members are appropriately and adequately trained to prevent or deal with safeguarding issues.

Safeguarding training

The Club will ensure there are qualified and designated individuals within the organisation that will take the lead on ensuring that the Club and the Trust does all it can to meet its statutory and moral obligations.

A safeguarding induction is provided to all staff. This will be delivered by the Club Safeguarding Manager or DSO. The Club Safeguarding Manager holds a specific safeguarding induction with all new staff coming into contact with children or vulnerable adults. Key elements of the safeguarding policy are discussed in more detail and specifically to the individuals' role.

Policy Reviewed 1st September 2019

Next Review 31st August 2020

All staff working in direct contact with children are required to complete the FA's Safeguarding Children Awareness Workshop and undertake a refresher course, at least every 3 years. Details of those satisfactorily completing this course are retained by the Human Resources Department.

Recruitment

QPR have a specific safer recruitment policy which sets out in detail the process the Club and the Trust will undertake in ensuring staff are suitable to work with children and adults at risk. A copy is available if required.

All staff will undertake a specific safeguarding and safer working practices induction upon employment at the club. A briefing document and guidance for safer working practices will be provided and will also be available on the intranet, under the safeguarding page. Key elements of the Club and the Trust's safeguarding policies are discussed in more detail if the role requires it.

Disclosure Barring Services (DBS)

Staff in roles that require contact with adults at risk, young people and children will undergo enhanced DBS disclosure, which is an ongoing procedure throughout the association with the Club and the Trust. Enhanced DBS checks enable the Club and the Trust to undertake more thorough recruitment and selection procedures and controls for positions which involve working with adults at risk and/or children.

Contractors

All external contractors engaged by QPR undergo a suitability test prior to commencing work. This will include evidencing the contractor's Safety Record, Safety Policy, Liability Insurance, Risk assessment and details of Competent Person. On arrival at the club the contractor will receive a site induction from a member of the Facilities team which covers safeguarding children and give details of the club's expected code of behaviour. Contractors are subject to regular inspection from club staff. In the event of a Contractor carrying out work on an area that is usually occupied by children this work, where possible, will be undertaken when children are not present.

Service Level Agreements

The Club and the Trust's commitment to safeguarding is outlined in any Partnership Agreement, Service Level Agreement or any other agreements that are in place with any service provider or for commissioned services insofar as those services relate to children or vulnerable adults. There must be an SLA with all partners and will include a caveat that we reserve the right to follow our own Safeguarding procedures if there is an incident and an agreement cannot be reached with partners. Safeguarding must be the overriding consideration when working with partners, in respect of this a due diligence review must form part of the referral pathway, to identify who will take ownership of Safeguarding issues and at what point.

Activity supervision and staffing ratios

Any activity undertaken by the Club or the Trust will always give full consideration to the appropriate number of staff members required depending on the age and number of children or adults at risk involved, the degree of risk the activity involves and whether there are any additional disability needs that need to

be met. As a general rule the lower the age of the participants or the greater the needs of the individuals then the level of supervision should increase.

Regardless of ratios a minimum of 2 members of staff or delivery partners will always be available to supervise an activity. This ensures continuous 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).

Mascots & Ball Persons

The Club will only allow children to be match day mascots or ball persons once parental consent has been obtained. A signed image consent form is also required before any images are published in the Club's match day programme.

No photographs of mascots or ball persons featured in Club publications will be accompanied by personal information about the child, such as their school, home address or local sports team.

High Risk Participants and Programmes

These are deemed high risk due to the nature of the referral pathway and disclosed information regarding the background of the participant at time of referral.

Participants referred onto programmes by the Youth Offending Service, H.M.P, Pupil Referral Units, Probation service, NOMS, CAMHS or other Early Help services will be screened using a referral form which must be fully completed by the referring service and participant. This is then given to the Trust DSO who will complete a risk assessment and decide next steps.

Activities for Disabled Persons:

All activities carried out for disabled persons are carried out under the guidelines of the Disability Discrimination Act.

Additional Policies

Image Policy

The Club and the Trust follow direction on the use of images from guidelines issued by the FA, the PL and the EFL. All images are taken by Club officials who have been briefed by the member of staff (and where possible a DSO) responsible for the activity being photographed / filmed. This applies equally to children and adults at risk.

- Before taking images of children/ adults at risk consent is sought in writing at the start of each football season or prior to the event. Parents/Legal Guardians are responsible for informing the Club and the Trust of any change of circumstances which may affect consent.
- Parents/Legal Guardians will be informed of how the image will be used. The Club and the Trust will not allow an image to be used for something other than that for which it was initially agreed.
- All participants featured in Club or Trust publications will be appropriately dressed.

Policy Reviewed 1st September 2019

Next Review 31st August 2020

- Where possible the image will focus on the activity taking place and not a specific individual
- Where appropriate images will represent the broad range of people participating safely in the event.
- Club photographers will, where applicable, undertake a DBS check and attend a Safeguarding Children workshop. They will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies issued by the Club and the Trust and by the FA, PL and EFL from time to time. Club Identification will be worn at all times.

Bullying Policy

The Trust has a specific anti-bullying policy

Whistleblowing Policy

Whistleblowing refers to making a protected disclosure under the Public Interest Disclosure Act 1998.

By encouraging a culture of openness QPR wants 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 QPR 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. 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 QPR to address issues raised quickly and effectively. This policy is available to all staff.

QPR have a whistleblowing hotline number for the reporting of any safeguarding concerns (0203 198 7086). Callers can remain anonymous and all reports are fully investigated.

Staff are encouraged to report any suspected instances of

- criminal behaviour or the committing of a criminal offence
- concerns over discrimination of any kind
- concerns about bullying behaviour
- any other areas of concern

The Trust also has codes of conduct for

- Parents and carers
- Staff & volunteers

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. A child or young person may not be aware that poor practice or abuse is taking place, as they may deem the behaviour as acceptable.

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

Policy Reviewed 1st September 2019

Next Review 31st August 2020

abuse of power or a breach of trust. Abuse can happen to a child or a vulnerable adult regardless of their age, gender, race, ability, culture or sexual orientation.

Signs of abuse

There are four main forms of abuse identified below. Any concern that abuse is occurring should be notified to the Club Safeguarding Manager or DSO for advice.

Physical Abuse:

- Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.
- Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- Physical abuse can be caused through an act or omission.

Sexual Abuse:

- Sexual abuse involves forcing or enticing a child or young person to engage in sexual activity, regardless of 'implied consent.' This includes penetrative (penetration of vagina, anus & mouth) and non-penetrative acts (touching (over or under clothing) any part of the body in a sexual way).
- Sexual abuse includes involving children in the watching of sexual acts, and encouraging children to engage in sexual behaviour as well as grooming offences which can also be committed via the internet.
- Sexual abuse can be perpetrated by anyone, including a parent or guardian, carer, family member, friend, neighbour, stranger or a person in a position of trust (includes 16/17 year olds).

Neglect:

- Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's 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 the child's ongoing emotional needs for affection and a sense of belonging.

Emotional Abuse:

- Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development, including verbal attacks on a child's sense of self, repeated humiliation or rejection. Exposure to violence, drugs, alcohol abuse or severe conflict in the home, forced isolation, restraint or causing a child 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 child 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, verbal and emotional, both face to face and via social media and other online forums. The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children 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 children are provided with services or are living away from home should have in place rigorously enforced anti-bullying strategies.
- **Cyberbullying**; this is when a person uses technology i.e. mobile phones or the internet (social networking sites, chat rooms, instant messenger, 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 risk of harm to children, whom 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 children.

Signs and Symptoms

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 child.
- Unexplained changes in behaviour (e.g. becoming quiet, 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

Remember that: 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.

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 cooperate 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. There will be training in this area so that staff across the Club, the Trust and the Academy is aware of signs and referral pathways in case of concerns. The Club Safeguarding Manager should be notified immediately of any concerns.

Responding to Allegations or Suspicions

All staff, volunteers and players have a responsibility to ensure the safety and welfare of children and 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 not the responsibility of anyone within the Club or the Trust to decide whether or not child abuse has taken place.

Where there is a complaint against a member of staff 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 or the Trust, which may also involve the FA, PL, or EFL.
- The club will delay an internal disciplinary or misconduct investigation while a criminal or local authority investigation takes place.

Historical Allegations

Historical allegations concerning; Staff who no longer work at the Club, existing staff or historic participants including those involved in peer on peer abuse should be reported via the Safeguarding Incident form to the Trust Safeguarding Officer or the Club Safeguarding Manager immediately. The Safeguarding Officer or Club Safeguarding Manager will directly report the information to the Local Area Designated Officer at Hammersmith & Fulham (Telephone: 020 8753 5125 email: LADO@lbhf.gov.uk) and keep a record on the Club/Trust electronic safeguarding log. This type of incident will be RAG rated as RED which requires the incident to be reported to the Club CEO and the Safeguarding Lead on the Board of Trustees (Mohamed Khaliel mkhaliel@gmail.com). The incident will also be reported to the Police and the FA Review Team. These procedures apply even if the alleged perpetrator of the abuse is believed to be deceased.

If a member of staff suspect abuse is taking place, or a report/allegation of abuse has been disclosed to them, the Club Safeguarding Manager or a DSO 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 child concerned in immediate danger. The

Policy Reviewed 1st September 2019

Next Review 31st August 2020

Safeguarding manager will notify the Local Authority Designated Officer and consult with the police and local authority childrens 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:

- Listen carefully rather than question the child or vulnerable adult directly.
- Stay calm and not offer personal opinions/thoughts.
- Be aware that medical or criminal evidence may be relevant.
- Tell the child or vulnerable adult that you are listening and taking what they say extremely seriously.
- Seek medical attention if necessary
- Take further action – it may prevent future abuse.
- Inform the Safeguarding Manager or DSO 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.

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 Megan Brown 020 8753 5125 megan.brown@lbhf.gov.uk
- POLICE – if emergency 999; 101 for all other cases

Should any further help or advise be required please contact

- FA CASE MANAGEMENT TEAM Stefania Sacco Stefania.Sacco@thefa.com
- County welfare officer (London FA) yasmin.dyer@londonfa.com
- EFL Trust 01772 325954 - DSO for EFL Trust Claire Taylor
- NSPCC 24 HOUR HELPLINE 0808 800 5000

Details of all policies or any further information is available from the Club Safeguarding Manager - Janet Barr Janet.Barr@qpr.co.uk

Policy Reviewed 1st September 2019
Next Review 31st August 2020