



**QPR Safeguarding Policy
and Commitment to
Safeguarding Adults at Risk
2020/21**

QUEENS PARK RANGERS FOOTBALL CLUB

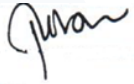


QPR Safeguarding Policy and Commitment to Safeguarding Adults at Risk

Draught version to be signed by October 2019

Approved and endorsed by

This Safeguarding Policy has been approved and endorsed as below:

Signature	Date
	7 September 2020



Policy Statement and Principles

QPR are committed to safeguarding and protecting the welfare of adults at risk (AAR). Our Safeguarding principles reflect the responsibility of the club and Trust and all staff for safeguarding and promoting the welfare and well-being of children, young people and adults at risk.

These are;

The welfare of children, young people and adults at risk is paramount.

Safeguarding is everyone's responsibility and AAR should feel safe at all our activities.

Policies will be reviewed annually as a minimum.

These principles are reflected in the club's codes of conduct.

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 have nominated a Senior Safeguarding manager Ruban Ghandinesen. The SSM sits on the Board and champions safeguarding at Board level.

The SSM 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 SSM training delivered by EFL
- 4) Ensure footballing authorities, EFL and FA safeguarding team are informed of any reportable cases as appropriate



Aims & Scope of the Safeguarding AAR Policy

The Safeguarding Policy for AAR demonstrates the commitment to safeguarding and protecting all vulnerable people it comes into contact with.

QPR recognise that every adult at risk is potentially at risk of abuse, and are committed that all adults that come into contact with the Club 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 and Trust
- 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 the Club interacts with. 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 Club. The Policy provides advice and directs 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

All Club and Trust activities are covered by the Policy but specifically (but 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
- All matchday activities
- 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

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.



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 Club has a full-time Safeguarding Manager. In addition, there is a full-time DSO within the Community Trust. The DSO will be on hand to support and assist all staff in identifying and dealing with potential safeguarding issues. The DSO will ensure that the SM is immediately notified of all potential safeguarding issues and concerns to make sure that appropriate action is taken.

Safeguarding Manager (SM) Responsibilities

The SM 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 DSO and act as a mentor to identify potential issues and encourage reporting of all concerns.
- Ensure that DSO 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 SM is Janet Barr and her contact details are as follows:

Email: janet.barr@qpr.co.uk **Telephone:** 0208 740 2572 **Out of hours:** 07880 204 366



Designated Safeguarding Officer (DSO) responsibilities

The DSO will;

- Support the SM 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 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 SM 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 Senior Manager Team meetings with the appropriate escalation and communication protocols in place.

QPR in the Community Trust has its own designated Safeguarding Officer, Claire Priddle, and her contact details are as follows:

Email: claire.priddle@qpr.co.uk **Telephone:** 0203 198 7124



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 its physical, sexual, psychological, financial /material, domestic abuse, modern slavery, discriminatory, organisational, neglect/ acts of omission or self-neglect.



Safer Recruitment Policy / Working With Ex-Offenders

QPR and QPR in the Community Trust has a robust safer recruitment/working with ex-offenders policy which sets out in detail the process will be undertaken to ensuring 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 SM or the HR Manager. The DSO/ Safeguarding manager 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 Safeguarding manager maintains a SCR with details of anyone with content on DBS.

QPR has a specific work strand with aiming to improve the employability of Ex-Offenders and has a specific policy designed to ensure the safe recruitment of ex-offenders. The Trust follows NACRO guidelines. Policy attached.

Checks - DBS

Staff in roles that require contact with adults at risk will undergo enhanced DBS disclosure, which is an on-going procedure throughout the 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. This will need to be a face to face meeting and original documents produced.

The safeguarding manager will refer cases to the DBS where a person has been engaged in regulated activity and a child/adult at risk was or may have been harmed or a staff member received a caution or was convicted of an offence.

Any adverse content is risk assessed and if necessary a meeting held with HR, Safeguarding manager and line manager, in line with safer recruitment policy.



The Safeguarding Framework - Rules, Regulations & Guidance

QPR Safeguarding practices is 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 Freedoms Act (POFA) (2012)
- Female Genital Mutilation Act (2013)
- Sexual Offences Act (2003)
- The Mental Capacity Act (2005)
- The Care Act (2014)
- Human Rights Act (1998)
- Disclosure and Barring Service (2013)

The Club recognises its responsibilities to maintain regular communication with the Local Authority and in particular Local Safeguarding Adults Board (LSAB) along with the LSAB of neighbouring London boroughs.

Relationships with 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.

The Club and 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 that requires certain minimum performance standards.

We will seek feedback from all our participants via our email address. This will be given out to all soccer schools, Disability, older adults & employability sessions. It is also available on Academy newsletter.



Staffing Ratios

Any activity undertaken by the Club and Trust will always give full consideration to 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).

More details of ratios are included in the Lone working policy attached.



Image Policy

The CLUB 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 DSO or SM) responsible for the activity being photographed/ filmed. All Trust /Academy /club activities are expected to adhere to the following guidelines.

- Before taking images of vulnerable adults, consent is sought in writing at the start of each football season or prior to the event. Legal guardians/ carers are responsible for informing the club of any change of circumstances within the season which may affect consent.
- All individuals featured in club 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 session to be able to account for all vulnerable adults under the club and 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 Kiyon Prince Foundation Stadium) then this should be reviewed as soon as possible.

Match Day Policies

Unaccompanied Adults

Any vulnerable adult should be accompanied to a match day at Kiyon Prince Foundation Stadium.



Whistleblowing Policy

As well as having robust measures in place to prevent abuse and to provide a safe and secure environment the Club and 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 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 whistle blowing policy to ensure that all issues are reported and investigated.

By encouraging a culture of openness, the club 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 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 whistle blowing charity Public Concern at work **0207 404 6609**

In addition to the above, the Trust and also 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.



Complaints

The Clubs complaints procedure can be found on this link:

<https://www.qpr.co.uk/club/charter/>

If you are under 18 and wish to make a complaint QPR have a “speak up policy” available on the website.



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 SM 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. Information will always be shared between Club and Trust in cases of safeguarding.

Service Level Agreements and engagement of contractors

Any organisation or individual who engages with the Trust must comply with the Trust's 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 relate to children or young people.

Any contractor must undergo a suitability test prior to working with the Trust. If the contractor is working at the Trust's premises at the stadium this function will be contracted to the Club's Operational Team to perform. This will include evidencing the contractor's safety record, safety policy, liability insurance, risk assessment and details of competent person. Any contractor working at the Trust's premises will receive a site induction which covers safeguarding and give details of the Trust's and the Club's expected code of conduct/ behaviour.

Any service level agreement will have details of safeguarding contacts, and references to our Safeguarding Policies and Procedures.

Safeguarding Records

Trust employees, DSO and SM should ensure that adequate safeguarding records are kept securely. Any notes or evidence relating to a safeguarding issue should be passed to the SM. Safeguarding concerns relating to Trust employees are kept securely with their HR files.

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 Trust and the Club's confidential document disposal service. These are all GDPR compliant.

COVID-19

This policy has been updated to include concerns around COVID-19. The Club will ensure all staff are fully updated around the latest government guidelines. Any staff, or anyone attending any QPR session and testing positive must notify the club immediately.



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. A vulnerable adult 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 a vulnerable adult regardless of their age, gender, race, ability, culture or sexual orientation.

Types of abuse

There are 10 forms of abuse identified as follows, should you have any concern that abuse is occurring you should contact the SM or DSO 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 a vulnerable adult.

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 a vulnerable adult 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 vulnerable adults 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 OR psychological 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.

Financial abuse

Modern day slavery

Self-neglect

Neglect or acts of omission

Discriminatory abuse

Organisational abuse

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 risk of harm to vulnerable adults, 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 adults at risk.



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 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. 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 staff should notify the DSO or SM if they have any concerns.

If they are unavailable staff can refer directly to Pinakin Patel pinakin.patel@lbhf.gov.uk 07554 222772 .



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 the 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 a vulnerable adult 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 SM or one of the Trust DSOs 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 complaint

- 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 have 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 online. 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 & 17 year olds under their care.



Managing allegations against employees, volunteers or contractors

Should a concern arise about an employee, worker or volunteer conduct in relation to an adult at risk, this should be reported to the DSO or SM at the earliest opportunity. The SM will take the necessary steps to ensure the safety of the individual. The reporting form (Appendix 1) should be completed. The DSO or SM will RAG rate all safeguarding incidents. Any which are flagged red should be referred to the SSM and Board of Trustees.

The SM will then follow this process

- 1) The allegation will be referred to the Local Authority Designated Officer (LADO) for the borough where the incident occurred. Where relevant the police and social services should also be advised.
- 2) The adult at risk 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.
- 4) It is the responsibility of the safeguarding manager to inform relevant football authorities i.e. the FA Safeguarding team and EFL Trust.
- 5) Where relevant and of a serious nature, QPR in the Community Trust are responsible for reporting serious incidents to the charity commission .

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

If a member of staff suspects abuse is taking place, or a report/allegation of abuse has been disclosed to them, where possible the SM 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 vulnerable adult concerned in immediate danger. The SM 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.



Safeguarding training and resources

Ongoing 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 SM or appropriate DSO.
- 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 SM is always contactable and holds a regular drop in “safeguarding surgery” so staff can discuss any concerns they may have in confidence.
- Staff will be trained according to their role, this will be a quarterly refresher of the FA Safeguarding workshop, procedures and legislation.

Level 1 – all staff

Level 3 – those working directly with children

Level 5 – senior safeguarding lead

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 a 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.



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 DSO.

All concerns involving Community Trust activities contact 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	
E-mail	

Details of the person you are raising a concern about:

Name	
Role (please tick)	<input type="checkbox"/> Adult at risk <input type="checkbox"/> Member of staff <input type="checkbox"/> Volunteer <input type="checkbox"/> Other
Date of birth	
Home address	
Telephone number	
E-mail	

Details of the parents/carers (if applicable):

Name(s)	
Address	
Telephone number	
E-mail	



Safeguarding Reporting Form (2/5)

Nature of the concern:

<p>Circumstances</p> <p>Include ALL the information known to you</p>	
<p>Details of any disclosures</p> <p>Include ALL the information known to you, including any verbatim comments</p>	
<p>Injuries seen</p>	
<p>Witnesses</p> <p>Include full details, including name, role and contact details</p>	



Safeguarding Reporting Form (3/5)

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 tick)	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If not, why?	



Safeguarding Reporting Form (4/5)

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

Name	
Role (please tick)	<input type="checkbox"/> Child <input type="checkbox"/> Adult at risk <input type="checkbox"/> Member of QPR staff - further detail required <input type="checkbox"/> Volunteer <input type="checkbox"/> Parent <input type="checkbox"/> Other - please detail...
Date of birth	
Address	
Telephone number	
E-mail	
Do they work/ volunteer anywhere else? (please tick)	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please give details	



Safeguarding Reporting Form (5/5)

Actions:

What has been done about the concern?	
Who has been informed about the concern? (please tick)	<input type="checkbox"/> Safeguarding Manager <input type="checkbox"/> Safeguarding officer (please name) <input type="checkbox"/> FA/Premier League <input type="checkbox"/> Police <input type="checkbox"/> Children's social services <input type="checkbox"/> Local authority designated officer <input type="checkbox"/> 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?	



Safeguarding Reporting Form

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

Report to their Manager in addition to the Safeguarding Officer/Manager as soon as possible.

Staff should not:

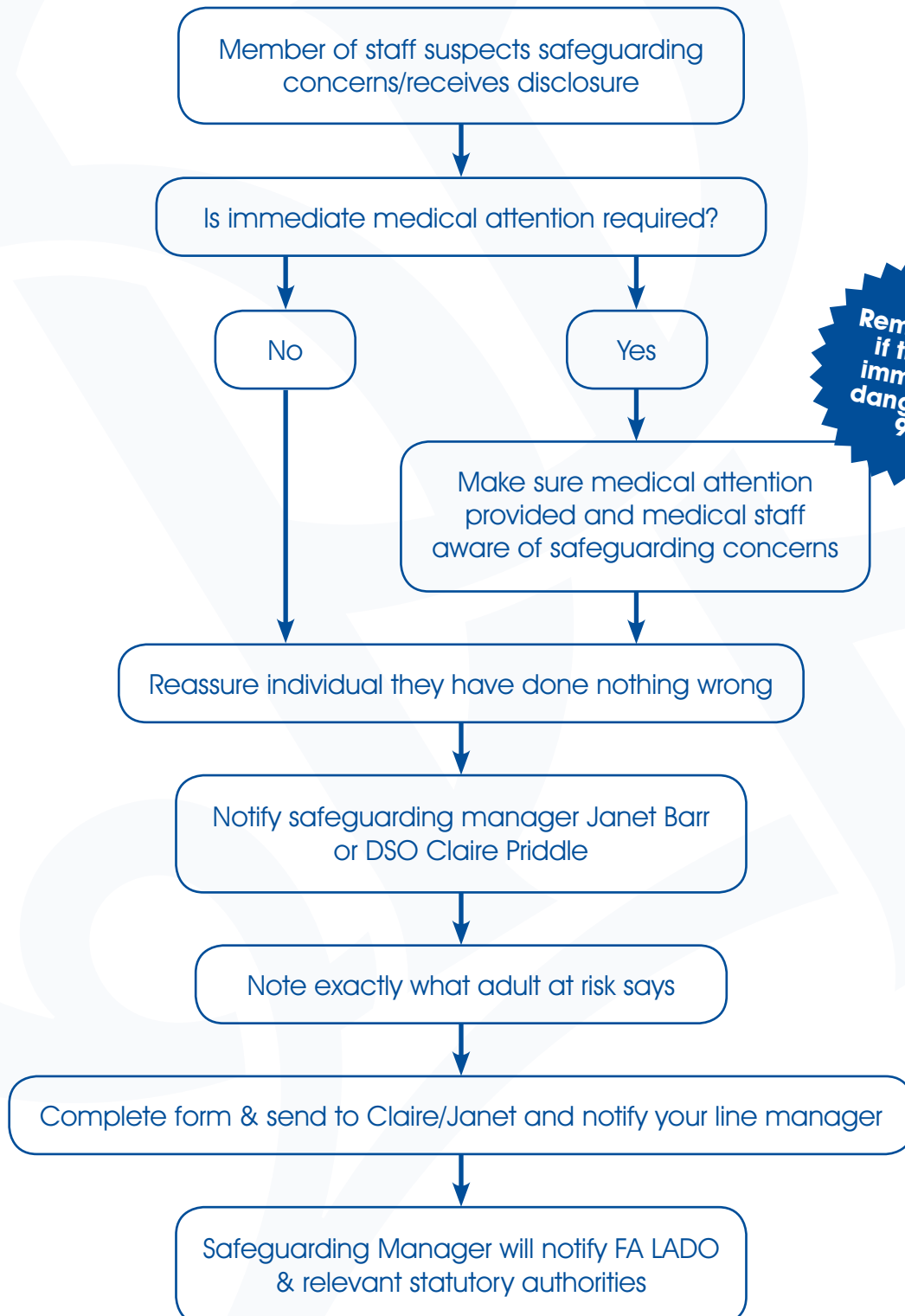
- Offer to keep any information disclosed confidential. Say there may be occasions where you must pass the information to the Police or other adult
- Make promises they cannot keep
- Interrogate the child – it is not their job to carry out an investigation.
- Cast doubt on what the child has told them – they shouldn't interrupt or change the subject
- Say anything that makes the child feel responsible for the abuse

Staff should ensure the Safeguarding Manager, or a Safeguarding Officer is informed as soon as possible. They will know how to follow this up and where to go for further advice. The 'reporting safeguarding concern' form (which is available for all staff via the safeguarding page on the QPR intranet) should be used to record information and pass to the SM.

Any injuries seen should be noted and recorded on a body map (which is available for all staff via the safeguarding page on the QPR intranet).



How to deal with safeguarding concerns



Remember – if there is immediate danger dial 999



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.

SAFEGUARDING PRINCIPLES

Safeguarding principles run throughout all codes of conduct and policies, these are:

- Safeguarding is everyone's responsibility
- Adults at risk should feel safe at all times
- This policy will be reviewed annually as a minimum

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 to 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 DSO
- 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 / alcohol consumption around any children, young people or adults at risk



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 Kiyan Prince Foundation Stadium.

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.

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 minimised; 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.



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**



QPR Safer recruitment & working with ex-offender's policy and procedures

Queens Park Rangers Football Club (QPR) is committed to safeguarding the welfare of Adults at Risk and Children. The Club expects all staff, players, volunteers, contractors and guests to share this commitment.

In line with this commitment the Club have a safer recruitment policy to ensure the welfare of adults at risk and children.

Offers of appointment are conditional upon:

- Receipt of at least two satisfactory references
- A face to face interview during which safeguarding knowledge will be tested. Originals of all coaching qualifications must also be provided. These will be uploaded onto Coaching Temp (GDPR compliant)
- Any gaps in employment history should be fully explained
- Verification of the candidate's identity, qualifications and professional status, where applicable
- All staff working within the club and undertaking regulated activity will be required to undergo an Enhanced DBS Disclosure. The Club will pay for this check and staff will be required to provide a copy of this check to the Club upon receipt. If information is disclosed from the Disclosure and Barring service which indicates criminal convictions, cautions or any other information you may be requested to attend an interview with the Club Safeguarding Manager, HR Manager and a senior member of staff to discuss in further detail. A risk assessment may then be conducted. If an individual is offered a role prior to receiving an unsatisfactory interview (as above) or reference from the Disclosure & Barring Service, the Club may terminate the engagement immediately. Throughout the association with the Club relevant staff will be required to re-apply for Disclosure through the DBS. The Club and/or The Football Association will decide the timing and frequency of such additional checks. Should a situation change at any time, the member of staff will be required to inform the Club of this and any offences which are relevant to the care, supervision and training of children will affect the ability to work with children and adults at risk and for QPR.
- A check of the barred list, where necessary
- Satisfactory completion of the probation period for relevant staff

The safeguarding manager maintains the Single Central record (SCR) this contains details of anyone with a conviction and if a Risk assessment has been carried out.

Procedure for online DBS application

A link will be sent to your email address prompting you to start the DBS process. Once completed you will be informed of whom to contact to have your documents verified. The applicant will be required to provide a range of documents as part of the DBS process.

This will need to be conducted face to face with a DBS verifier and original documentation must be produced.



Safeguarding Induction Procedure

Every new employee will have a face to face safeguarding induction with member of safeguarding team.

HR will notify the safeguarding team of each new starter. A time will then be arranged for the face to face induction to take place.

Safeguarding knowledge can be assessed, and any training needs identified. A copy of the policy is provided during this induction.

All staff MUST complete the FA Safeguarding children workshop. This will be renewed every three years. During this time attendance to additional safeguarding workshops is mandatory, a record of attendance is maintained.

Criminal Record Assessment

- All future employees should complete a self -declaration form (YD/2). If a self - declaration has some content, prior to be offered employment or placement on a participant scheme, a criminal record assessment will take place as follows;
- The factors to be considered are the role applied for and the details disclosed by the applicant. This will be part of the initial assessment

A face to face meeting will then take place, this is a disclosure discussion. This will be carried out by the safeguarding manager, HR manager and line manager.

QPR in the Community Trust will adhere to NACRO guidelines when working with / recruiting ex - offenders.



Lone working and safer practices

This policy sets out the provisions on lone working; this is to be avoided where possible. Where lone working is necessary, whether on a regular or occasional basis, QPR will take all reasonable steps to ensure the health, safety and welfare of employees working alone and assess and reduce any risk to employees.

Purpose

This policy is designed to alert staff to the risks presented by lone working, and to identify the responsibilities of all staff who is this situation.

Ratios

In a group of adults at risk, there should always be at least 2 members of staff, one female if participants are female. A full risk assessment should be conducted for each activity, the Safeguarding manager can assist with this in relation to ratios.

In relation to adults at risk, consideration should be given to the nature of the activity and the ability of the adults involved.

Procedure

Lone working can be safe provided employees take the following basic precautionary measures:

- ensure that another member of staff, preferably your line manager, is aware you are working alone, where you are, what you will be doing and what time you expect to finish
- make sure you have some means of communication with someone in the event of an emergency, such as a mobile phone or two-way radio
- ensure you have access to first aid equipment
- know where your nearest emergency exit is and the Company's emergency evacuation procedures
- make sure intruders cannot access the premises by checking that windows and external doors are locked
- comply with any arrangements or follow any guidance provided by your line manager for lone working
- take all reasonable steps to ensure your own safety
- Inform your line manager as soon as possible of any incidents or safety concerns.

Line managers should ensure that:

- lone working is avoided as far as is reasonably practicable
- arrangements are in place so that someone is aware of a lone worker's whereabouts at all times and a check is carried out at the end of the lone working period
- emergency procedures are in place so that lone workers can obtain assistance if required
- lone workers are provided with adequate information and training to understand the risks and the safe working procedures associated with working alone
- any employee working alone is capable of undertaking the work on their own

The job can be done safely by one person.