



Children & Young People Safeguarding Policy

QPR in the Community Trust
Commitment to Safeguarding

QPR IN THE COMMUNITY TRUST



Contents

Statement from the Trustees	3
Policy Aims & Principles	4
Scope	5
Key Safeguarding Terminology and Definitions	8
Rules, Regulations & Guidance	10
Resources and Training	12
Recruitment	12
Disclosure & Barring Service	13
Ratios / Lone Working Policy	14
Image Policy	15
Match Days	16
Managing Allegations against staff and volunteers	17
Whistleblowing Policy	18
Complaints Procedure	19
High Risk Participants and Programmes	20
Activities for Disabled Persons	20
Positions of Trust	21
Contractors & Service Level Agreements	22
Definitions of Poor Practice and Abuse	23
Signs of Abuse	24
Signs and Symptoms	27
What to do if you suspect Poor Practice or Abuse has occurred	28
Managing allegations against Employees, Workers, Volunteers or Staff	29
Reporting Safeguarding Concerns	31
COVID-19 Response	32
Mental Health	33
Emergency Contacts	34
Procedures and Safety measures for online learning	35

Policy Reviewed: 28th January 2022 **Next Review:** 31st December 2022



Statement from the Trustees

QPR in the Community Trust (Trust) is committed to Safeguarding the welfare of children and young people.

The Trust recognises its moral and legal responsibility to promote and safeguard the welfare of children taking part in our sessions. The Trust will work alongside the football club (Club) to ensure the safety of all those who engage with and come into contact with the Trust. The Club and Trust expects all staff, players, volunteers, participants, contractors and guests to share this commitment.

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

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



Policy Aims

To provide all Trust staff with information to enable them to child protection responsibilities

To demonstrate the Trusts commitment to safeguarding

- To safeguard all Children and young people who interact with the Club.
- To demonstrate best practice around safeguarding Children.
- To provide guidance for parents to understand reporting procedures.
- To encourage a partnership between the club and parents/carers of children associated with the club.
- To ensure that coaches, parents and other adults who come in contact with children and young people provide good role models of behaviour.
- To promote high ethical standards throughout the Club.
- To ensure that all coaches, parents and other adults coming into contact with the club are good role models.
- To ensure children feel safe in all our activities.

Policy Principles

This policy is available on the Trust Website, the Trust principles for Safeguarding are reflected throughout this Policy and are.

Safeguarding is everyone's responsibility.

The Trust accept responsibility to safeguard and promote the welfare and wellbeing of children



Scope

The Trust believe that all staff, players, volunteers, participants, contractors and guests have a responsibility to report any concerns to the Trust should they be concerned about the welfare of any child or young person.

This policy is applicable to every employee of the Trust including staff, volunteers, parents, carers, work experience placements, participants and trustees. The policy will be observed by all those working and coming into contact with children and young people to ensure best practice in safeguarding is promoted and adhered to. Activities undertaken at the following locations are under the remit of this policy including;

QPR Women/Girls

QPR in the Community Trust Soccer Schools

QPR Girls college Academy

Trust activities at schools, other venues etc.

Kicks projects, and all projects run by Trust coaches

All employees and workers are made aware of the Policy and procedures through induction and where appropriate their work with children and young people will be supported by a comprehensive ongoing Safeguarding Training program.

Safeguarding children and young people is defined as;

- 1) Protecting children and young people from maltreatment
- 2) Preventing impairment of children or young people's health or development
- 3) Ensuring that children or young people are growing up in circumstances consistent with the provision of safe and effective care
- 4) Taking action to enable all children and young people to have the best life chances

The Club and Trust are committed to ensuring that:

- The safety and welfare of Adults at Risk and Children under the care of the club and Trust is paramount.
- All children have the right to participate in Trust sporting activities in a safe environment free from bullying, abuse or exploitation
- All Adults at Risk and Children that engage with the club and 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 & investigated thoroughly which may involve the appropriate local authority teams where necessary.

The club has employed a trained Club-wide Safeguarding Manager who works across the Club and Trust, and the Trust have a full time Designated Safeguarding Officer. The Club Safeguarding Manager has



responsibility to oversee and direct the safe provision of all activities and associated training relating to children and young people. A strategic role providing leadership and guidance on all safeguarding matters and relevant legislation, along with implementing safeguarding awareness and best practice across the Club, Academy and Trust.

The Safeguarding Manager will;

Manage the implementation of the Trust and Club's strategy and action and implementation plan for safeguarding.

Ensure club compliance with statutory obligations under relevant legislation and the Affiliated Football Safeguarding Policy.

Work closely with HR and heads of departments to develop and implement safer recruitment and induction practices across the organisation.

Continuously work to maintain, embed and improve the Trust and Club's safeguarding provision ensuring the highest standards for safeguarding vulnerable groups.

Manage the development, implementation, promotion and review of the Trust and Club's safeguarding vulnerable groups' 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.

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

Work closely with Trust DSO s (details below) to promote safeguarding and deal with any safeguarding issues

The Safeguarding manager is Janet Barr

Email: Janet.barr@qpr.co.uk

Office: 0208 740 2572

Mobile 07880 204 366



Designated Safeguarding Manager For The Trust Role Description

- 1) Support club safeguarding manager to pro-actively promote and raise safeguarding awareness
- 2) Advise others working with children on the implementation of policies and procedures around safeguarding
- 3) Ensure staff understand their individual responsibilities to safeguard and promote welfare of children
- 4) Support colleagues to respond appropriately to concerns about children's welfare or safety
- 5) Assist Club Safeguarding Manager to maintain accurate and confidential information and to meet regularly to ensure safeguarding standards are upheld and work with another DSO s across the Club.
- 6) The SM for the Trust is listed below together with their contact details

Club wide safeguarding meetings are held quarterly, these are mandatory for the SM from the Trust and Academy, and the safeguarding manager.

The Trust SM is Daniel Whyne

Email: Daniel.Whyne@qpr.co.uk
Office: 0203 198 – 7124
Mobile: 07483 006 985

This safeguarding policy is applicable to the season 2021/22 and will be subject of ongoing review, and a minimum of once a year.

Aims of this policy

- To safeguard all Children and young people who interact with the Club and Trust
- To demonstrate best practice in the area of safeguarding Children
- To increase awareness and understanding of safeguarding issues club wide, and within the Trust
- To provide guidance for parents and carers to understand reporting procedures
- To encourage a partnership between the Trust/ Club and parents/carers of children associated with the Club and Trust
- To ensure that coaches, parents, participants and other adults who come into contact with children and young people provide good role models of behaviour
- To promote high ethical standards throughout the Club and Trust



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 & 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, but still under 18 years old, as per the C&YP Act 1989 & 2004 & working together to safeguard children 2015 .

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.

Child abuse - involves acts of commission and omission, which results in harm to the child. The four types of abuse are physical abuse, sexual abuse, emotional abuse and neglect.



Rules, Regulations & Guidance

The Club and Trust are governed by the legislation and rules/regulations set out by several key governing agencies including the Government, Football Association, Premier League 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, ELF Safeguarding Guidance and the NSPCC Standards for Safeguarding Children in Sport and is underpinned by the following legislative documents and policies .

- Working Together to Safeguard Children (2018) <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>)
- The Children Act (1989 and 2004)
- Education Act 2002 (<https://www.legislation.gov.uk/ukpga/2002/32/contents>)
- 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) (2015)
- Female Genital Mutilation Act (2013)
- Keeping Children Safe in Education (2021) (Updated version effective September 2021) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999348/Keeping_children_safe_in_education_2021.pdf
- 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
- Information sharing (advise for practitioners)
- Standards for Safeguarding and Protecting Children in Sport 2005 NSPSS and CPSU
- EFL Safeguarding Standards
- London Child Protection Procedures and Practice Guidance



The Trust and Club recognise their responsibilities to maintain regular communication with the Tri-Borough LSCB along with the LSCB of the neighbouring London boroughs, Local Authority children's services, Local Authority Designated Officer and the Police safeguarding teams. The communication of the Club with the Local Authorities is centred upon supporting the club 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 and 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. 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.

The Club and Trust are committed to ensuring that:

- The safety and welfare of Adults at Risk and Children under the care of the Club and Trust is paramount.
- All children have the right to participate in Trust sporting activities in a safe environment free from bullying, abuse or exploitation
- All Adults at Risk and Children that engage with the Club and 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 & investigated thoroughly which may involve the appropriate local authority teams where necessary.

If the matter is of a sexual nature or urgent and the SSM is unavailable, please contact the local police.

Club-wide safeguarding meetings are held quarterly, these are mandatory for all DSO from the Trust and Academy, and the safeguarding manager.

This safeguarding policy is applicable to the season 2021/2022 and will be subject of ongoing review, and a minimum of once a year



Resources and Training

A safeguarding induction is provided to all staff. This will be delivered by the Club safeguarding manager or designated safeguarding officer. The SM holds a specific Safeguarding Induction with all new staff who will come into contact with children. Key elements of the Club safeguarding policy are discussed in more detail and specifically to the individuals' role.

In addition to this regular safeguarding workshops are held for all Community Trust staff.

The Safeguarding manager holds a regular drop in "safeguarding surgery" for all staff to discuss any concerns they may have in confidence .

All staff working in direct contact with Children are required to complete the FA's 3 hour Safeguarding Children 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 in the Community Trust have a specific Safer Recruitment and working with ex- offenders Policy which sets out in detail the process the Trust will undertake in ensuring staff are suitable to work with children and adults at risk. This policy outlines how the Trust will manage the recruitment of ex-offenders, the management of any DBS content and the decision-making process.

This policy is attached for reference. available on the intranet or upon request from the safeguarding manager.

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.



Disclosure & Barring Service

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

The Safeguarding Manager will refer cases to DBS where a person has been engaged in regulated activity and the following apply;

Where a child or adult at risk was, or may have been harmed

Or

A Trust staff member received a caution or was convicted of a relevant offence.



Ratios / Lone Working Policy

Any Activity undertaken by the Trust will always give full consideration to the appropriate number of staff members available depending on the age of the Children involved, the degree of risk the Activity involves, and whether there are any additional disability needs. The lower the age of the participants, the greater the need for supervision.

Regardless of these ratios a minimum of 2 members of staff or delivery partner will always be available to supervise an Activity. 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).

- For Children under 5 the recommended ratio should be no more than 1:6.
- For Children under 8 the recommended ratio should be no more than 1:8.
- For Children over 8 the recommended ratio should be no more than 1:10, but this varies depending on the Activity. Advice should be sought from the Safeguarding manager if unsure.

Lone Working Policy

The Trust has a specific Lone Working Policy, the principles of this are;

- All staff to ensure that another member of staff, preferably a line manager, is aware of anyone working alone and of start and finish times.
- Staff to ensure they have means of communication with someone in the event of an emergency, such as a mobile phone or two-way radio.
- Staff to ensure access to first aid equipment
- Staff to be aware of nearest emergency exit is & evacuation procedures.



Image Policy

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

- Before taking images of Children, parental 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 of any change of circumstances within the season which may affect consent.
- Parents/Legal Guardians will be informed of how the image will be used. The Club will not allow an image to be used for something other than that for which it was initially agreed.
- All Children featured in Trust / Club publications will be appropriately dressed.
- Where possible, the image will focus on the activity taking place and not a specific Child.
- Where appropriate, images represent the broad range of people participating safely in the event.
- Designated Club photographers will, where applicable, undertake a DBS check and attend a Safeguarding Children workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies issued by the Trust/ Club and by the Premier League from time to time. Club Identification will be always worn.
- Children 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/ Club document.
- No images of Children featured in Club publications will be accompanied by personal details such as their school or home address.
- Recordings of Children for the purposes of legitimate coaching aids are only filmed by Club officials and are stored safely and securely at the Club's premises.
- The Trust/ Club does not put young player profiles with images and personal information on its website.



Match Days

Unaccompanied Children

In accordance with the Club's ticketing terms & conditions, the minimum age that a Child is permitted to attend a match at is 14 years old.

Mascots & Ball Persons

The Club /Trust 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.



Managing Allegations against staff and volunteers

The Trust have a policy to deal with instances where there is an allegation against a volunteer or member of staff. If this is a concern made by a colleague this should be discussed with their line manager and Safeguarding Manager.

All allegations against staff must be made to the safeguarding manager, who will make a referral to the Local Authority Designated Officer.

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 Trust/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.

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.



Whistleblowing Policy

Whistleblowing refers to making a protected disclosure under the Public Interest Disclosure Act 1998. QPR have a whistle blowing policy

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.

In addition to the above, QPR have a specific Safeguarding whistleblowing hotline number for the reporting of any safeguarding concerns; 0203 198 7086.

Although this list is not exhaustive, examples of situations in which a disclosure may be made include;

The committing of a criminal offence

Concerns over discrimination of any kind

Concerns about bullying behaviour

Concerns about poor practice

Anti-bullying policy

The Trust have a specific anti bullying policy. This details the different types of bullying, and that this can happen both on and off-line.



Complaints Procedure

QPR in the Community Trust have a complaints procedure which will be followed where a child or parent raises a concern about poor practice. This may be where the threshold is not met for raising child protection concerns. The definitions of poor practice and abuse are outlined below.

Formal complaints will be managed by senior staff, in consultation with HR and Safeguarding manager where appropriate.

Should any poor practice amount to a child protection issue the clubs child protection policies and procedures will be adhered to.



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.

In addition, a safeguarding implementation plan is to be implemented for high risk participants that are classified as a Child in Need, and programmes designed to support such participants.

Activities for Disabled Persons

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



Positions of Trust

As a result of their knowledge, position and/or the power, influence and authority invested in their role, all adults working or assisting in the delivery of activities for children and young people within the Club are considered to be in positions of trust in relation to the young people in their care. A relationship of trust can be described as one in which one party is in a position of power and influence over the other by virtue of their work or the nature of their activity. It is vital for all those in such positions of trust to understand the power this can give them over those for whom they are responsible, and the responsibility they must exercise as a consequence.

“Where a person older than 18 is in a specified “position of trust”, it is an offence for them to have any sexual activity with a person under the age of 18. This law has applied since the Sexual Offences (Amendment) Act 2000 came into force in January 2001 and applies even if the relationship is consensual. Prior to the Act, the age of sexual consent - 16 - was the only issue.

In the school setting, it applies where the child is in full-time education and the person works in the same place as the child, even if the person does not teach the child.” A relationship between a member of staff and a child or young person cannot be a relationship between equals, as there is the potential for exploitation and harm of vulnerable young people.

Staff must always maintain appropriate professional boundaries and avoid behaviour which may be misinterpreted by others. Where a person aged 18 or over is in a specified position of trust with a child under 18, IT IS AN OFFENCE for that person to engage in an intimate relationship or sexual activity with or in the presence of that child or cause or incite that child to watch sexual activity.

This means adults MUST NOT use their position to gain access to information for their own or others advantage, or use their power to intimidate, threat coerce or undermine children or young people or use their status to form or promote relationships, which are of a sexual nature or may become so.

Staff should not:

- Have sexual relationships with children
- Have any forms of communication with a child which may be interpreted as sexually suggestive or provocative
- Discuss their own sexual relationships with or in the presence of a child



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 commitment to safeguarding is 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.



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. Any incidents of poor practice should be recorded on CPOMS and/or discussed with the CTSM.

Some examples of poor practice are listed below.

- 1) Spending large amounts of time alone with a child
- 2) Being in changing rooms or showers when in use by children or young people
- 3) Reducing a child to tears as a form of control
- 4) Sharing a room with a child
- 5) Failure to conduct a risk assessment prior to each session.

Some examples of good practice include;

- 1) Using acceptable language and being a role model
- 2) Request written permission from parents if Club officials need to transport children
- 3) If supervision is required in changing areas coaches should not be alone

This list is not exhaustive, any concerns should be raised to the SSM. QPR will notify parents whenever any concerns are raised about their child.

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.



Signs 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 nominated 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 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 over-sexualised behaviour, and 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 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) including peer on peer

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

Domestic abuse is a significant indicator of risk of harm to children, 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 children.

'Sexting'

UK council for child internet safety provides advice on sexting, "responding to incidents and safeguarding young people", is designed for designated safeguarding leads, their deputies, head teachers and senior leadership teams in schools and educational establishments in England. The same advice can apply to football clubs.

The advice covers a variety of issues, including responding to disclosures, handling devices and imagery, risk assessing situations, involving other agencies (including escalation to the police and children's social care), recording incidents, involving parents and preventative education. The advice aims to support schools and those working with young people in developing safeguarding procedures to respond to incidents involving youth produced sexual imagery. It highlights key sources of resources and support that help school if incident happen. Please see the links below for further advise.

<https://www.gov.uk/government/publications/indecent-images-of-children-guidance-for-young-people/indecent-images-of-children-guidance-for-young-people>

<https://www.safeguardingschools.co.uk/wp-content/uploads/2016/08/Sexting-in-schools-and-colleges-UKCCIS-August-2016.pdf>



FGM mandatory reporting

Female genital mutilation is the partial or total removal of external female genitalia for non-medical reasons. Religious, social or cultural reasons are sometimes given for FGM however its is child abuse and a criminal offence.

Section 74 of Serious Crime act 2015 amended the female genital mutilation act 2003 to introduce the legal duty for regulated health and social care professional and teachers to report to the police if;

- they are informed by a girl under 18 that she has undergone an act of FGM and/or
- they observe physical signs that an act of FGM may have been carried out on a girl under 18.

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 rolled out in this area so that staff across the Trust are aware of signs to be aware of and referral pathways. Liaise with Safeguarding manager if there are any concerns about this.

Child Sexual Exploitation and Criminal Exploitation

Child sexual exploitation occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a Child into criminal or sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may be sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place through the use of technology. Children or young people may be tricked into believing they are in a loving consensual relationship.

Child criminal exploitation is commonly associated with county lines (being coerced into moving drugs and or money between locations. It also includes children forced to commit criminal acts (theft and violence). The victim may be exploited even if the acts appear consensual.

If the Safeguarding Manager is unavailable, referrals can be made directly to pinakin.patel@lbhf.gov.uk 07554 222772. Staff requiring training around Prevent can e-mail prevent@lbhf.gov.uk to enquire about training sessions.

If the behavior of anybody involved in our activities indicates that they or those around them are at risk of harm, staff should report these concerns immediately to the DSO. In the event that there appears to be an immediate risk or danger call 999.

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.

What to do if you suspect Poor Practice or Abuse has occurred

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

The first priority in safeguarding should always be to ensure the safety and welfare of the child or young person. If concerns arise, best practice would be to gain the consent of child or young person before making a referral to another agency, however in the cases listed below referrals **MUST** be made without that consent:

- The child or young 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 you are concerned about the safety or welfare of a child or young person or are concerned about an adult's behaviour towards a child or young person **YOU MUST ACT**, doing nothing is not an option.

DO NOT ASSUME THAT SOMEONE ELSE WILL HELP THE CHILD OR YOUNG PERSON. Safeguarding is everyone's responsibility. You must report your concerns to Safeguarding manager or one of the Trust DSOs.

What to do if you receive a safeguarding disclosure from a child or young person

Children or young people who may be vulnerable are likely to disclose abuse or neglect to someone they trust, so correct handling is crucial

- 1) Deal with it as it happens, ensure the child/ young person 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 child to talk freely, reassure them they have done nothing wrong
- 4) Ask open questions, don't lead the child



Managing allegations against Employees, Workers, Volunteers or Staff

Should a concern arise about an employee, worker or volunteer conduct in relation to a child or young person, this should be reported to the Club Safeguarding Manager, who will take the necessary steps to ensure the safety of the child or young person. The reporting form (appendix 1) should be completed.

The safeguarding manager will then follow this process

- 1) The allegation will be referred to the Local Authority designated officer (LADO) and/or Police
- 2) The parent/carer of the child or young person will be contacted as soon as possible following advice from statutory agencies

Where there is a complaint against a member of QPR 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 Football Association or Premier League.
- The club will delay an internal disciplinary or misconduct investigation while a criminal or local authority investigation takes place.

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 the 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 child concerned in immediate danger. The Safeguarding manager will notify the LADO and consult with the police and local authority children's social care as appropriate. Useful contact details are listed at the end of this policy.

On receipt of a referral it is the responsibility of the Safeguarding manager to ensure the relevant football authorities are notified; the FA Case Management Safeguarding team, and the EFL Trust as well as the Local Authority Designated Officer and where applicable social services and Police.



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

Staff should:

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



Reporting Safeguarding Concerns

Any concerns about Safeguarding or welfare must be recorded on the CPOMS system. All staff, new employees contractors and host families will be able to access this system to ensure all concerns, however minor are recorded.

<https://qpr.cpoms.net>

Low Level Concerns

A low level concern is any concern, no matter how small, and even if no more than a nagging doubt, that an adult may have acted in a manner which is not consistent with QPR codes of conduct and / or relates to their conduct outside of work, which even if not linked to a particular act or omission has caused a sense of unease about their suitability to work with children.

The decision as to whether something is a low-level concern will be that of Trust Safeguarding Manager. Staff only need to share their concerns at the earliest opportunity.



COVID-19 Response

Club Statement The way in which QPR is subject to ongoing review but the way in which we are operating in response to Coronavirus (COVID-19) is fundamentally different to business as usual, however, a number of our important safeguarding principles remain the same:

- with regard to safeguarding, the best interests of children will always continue to come first
- if anyone has a safeguarding concern about any child connected to the Club they should continue to act and act immediately
- a Designated Safeguarding lead or Deputy will always be available
- unsuitable people are not allowed to enter the Club workforce and/or gain access to children
- children continue to be protected when they are online

Club Safeguarding Contacts

During the Covid-19 lockdown period the Safeguarding contacts for the Club are as follows:

Club Senior Safeguarding Manager Janet Barr

Janet.barr@qpr.co.uk

0208 740 2572



Mental Health

Negative experiences and distressing life events, such as the recent circumstances, can affect the mental health of us all. Players or staff who are struggling should contact the Club safeguarding staff as outlined above. Support can also be accessed through a number of national organisations including:

The Samaritans	Tel: 116 123	https://www.samaritans.org
ChildLine:	Tel: 0800 1111	https://www.childline.org.uk
NSPCC:	Tel: 0808 800 5000	https://www.nspcc.org.uk
Mind:	Tel: 0300 123 3393	https://www.mind.org.uk
PFA:	Tel: 07500 000 777	https://www.thepfa.com/wellbeing

R You OK?

During lockdown QPR launched an initiative for fans and staff called “R You OK?” This is a helpline for anyone who may be anxious or worried about anything or anxious about returning to work. This initiative is still available, we have safeguarding officers who are ready to chat to anyone who may have concerns of any kind. They can be contacted via email or the phone number below:

Email: safeguarding@qpr.co.uk

Tel: 07483 006 924

Remember that in an emergency or where there is risk to life you should contact the police immediately.



Emergency Contacts

- 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
- Should you require police assistance call 101 or 999 in an emergency

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
- Child protection advisor EFL - Claire Taylor
- OR EFL Trust 01772 325954 DSO for EFL Trust - Claire Taylor
- NSPCC 24 HOUR HELPLINE 0808 800 5000

Other Safeguarding contacts in football

Whilst any safeguarding concern should be raised with the Club Safeguarding contacts in the first instance we recognise that this may not always be possible or appropriate. Below are the contact details for footballing partners with whom safeguarding concerns in relation to the Club can be discussed:

The English Football League Safeguarding Team

Email: safeguarding@efl.com
Tel: 01772 325940

If the concern regards a person in employed in footballs conduct towards a child:

The FA Safeguarding Team

Email: Safeguarding@TheFA.com
Tel: 0800 169 1863



Procedures and Safety measures for online learning

The Club expects all staff and players to adhere to the relevant policy boundaries must be maintained at all times. We have put extra measures in place to reduce the risks in relation to online learning which include:

- All contact online being observable and interruptible
- Staff and children must wear suitable clothing as should anyone else in the household
- Any computers being used should be in appropriate areas, for example not in bedrooms and the background should not be blurred
- Online teaching will not be carried out on a one-to-one basis and will be done in a group setting with several players present,
- Another adult will be invited to be present in the room
- All communication provided will have an educational purpose
- Language must be professional and appropriate, including any family members in the background
- The Club will record online teaching/instruction sessions. Players and parents will be informed that sessions are being recorded in advance of doing so.
- All sessions provided will be via the Clubs I.T platform (for example remote desktop) or Wi-Fi (where possible)

Online Safety

It is important that internet safety and security messages are re-enforced during this time when we are expecting young people to be online more often. They may also be increasing their usage on devices during their own free time during this lockdown period. It is important that both players and parents are aware of the help and support available should they be concerned about something they have seen or experienced online. These include:

UK Safer Internet Centre	https://reportharmfulcontent.com/
CEOP	https://www.ceop.police.uk/safety-centre/
Internet Matters	https://www.internetmatters.org/
NetAware	https://www.net-aware.org.uk/
ParentInfo	https://parentinfo.org/
ThinkuKnow	https://www.thinkuknow.co.uk/