



## **Crystal Palace Football Club children safeguarding policy**

### **Words from our Chairman**

**I am firmly committed to ensuring the safety and wellbeing of all individuals and communities we come into contact with; it is a fundamental part of the culture of the club, that we provide a positive experience, particularly for children, young people and adults at risk. I fully endorse our safeguarding policies, expecting all staff to adhere to them and work within best practice guidelines at all times.**

**We encourage the reporting of any concerns and support the need for fair and proportionate investigations into any allegation of poor practice.**

**I care about the well-being of individuals, and our policies help to ensure everyone has access to the opportunities that Crystal Palace provides. It is the responsibility of everyone who has contact with children and other vulnerable people, to create a positive environment in which they can participate, and to protect them from the risk of harm.**

**Steve Parish,**

**Chairman CPFC.**

## **Statement from the Board**

**The safety and welfare of Children under the care of the club is paramount. All participants and visitors to club activities have a right to feel safe and be safe. All members of staff have a duty to keep children safe and help protect them from abuse or harm.**

**All Children that engage with the club, regardless of age, culture, social background, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to feel safe and protected from abuse, exploitation and poor practice, and have their welfare promoted. We will constantly look for new and innovated ways to provide the highest level of care to children engaged in club activities. This could include consulting with survivor groups and child welfare experts.**

**The mental well-being of all children will be promoted by all staff.**

**The club fully supports the national Prevent programme and will raise awareness across all areas of the club's business to highlight the risk of radicalisation.**

**All suspicions, reports and/or allegations of abuse will be taken seriously & investigated thoroughly which may involve the appropriate local authority teams where necessary.**

Crystal Palace Football Club acknowledges its duty of care to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory requirements and responsibilities, government guidance, recognised best practice and complies with Premier league and football league rules.

The club expects all staff, players, volunteers, partners, contractors and guests to share this commitment.

The club commits to employing a trained Club-wide Head of Safeguarding and designated safeguarding officers who implement, maintain and monitor best practice across the club.

This safeguarding policy, is applicable to the season 2018/19 and recognises the introduction of Government guidance contained in the revised 'Working Together to Safeguard Children 2018' publication. It will be monitored and reviewed a minimum of once a year, or whenever there is a change in legislation, organisational change or following any learning outcomes or serious case reviews from safeguarding incidents, concerns or allegations. Any review and change in policy will be conducted in consultation with the Local safeguarding children board.

## **Aims of this policy**

- To safeguard all Children and young people who interact with the Club.
- To demonstrate best practice in the area of safeguarding Children.
- To increase awareness and understanding of safeguarding issues club wide.
- To provide guidance for parents and other interested parties 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 understand their safeguarding responsibilities and provide good role models of behaviour.
- To promote high ethical standards throughout the Club

## **Key Safeguarding Terminology and Definitions:**

**The Club** – refers to Crystal Palace Football Club (CPFC), 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 Foundation** – refers to Palace for Life Foundation, 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 standalone Academy department within the club which 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 Selhurst Park stadium.

**The Training Ground** – The club's external training centre at which day to 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 Charity. 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 charity at their own expense in terms of time and/or resources.

**Child** – Defined in the Children's act (1989) as any person under the age of 18.

**Safeguarding** – Preventative and reactional measures taken by the club and Foundation to ensure; the risk of harm or mistreatment to the welfare of vulnerable groups are minimised; the health or wellbeing of vulnerable groups are not impaired when engaging in club or charity 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.

**Prevent Training** – This is the government led education programme to protect individuals from risk of radicalisation.

**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. Types of abuse include physical abuse, sexual abuse, emotional abuse and neglect.

## **Rules, Regulations and Guidance**

**The Club is governed by the legislation and rules/ regulations set out by several key governing agencies including the Government, Affiliated Football Safeguarding Policy, Football Association, Premier League and the NSPCC Child protection in Sport Unit. The content of this policy is underpinned by the following legislative documents and policies.**

**The Children Act 1989 - HM Government**

**Every Child Matters 2003 - HM Government**

**Safeguarding Vulnerable Groups Act 2006 - HM Government**

**Working Together to Safeguard Children 2018 - HM Government**

**Keeping Children safe in Education 2014 - HM Government**

**Human Rights Act 1998 – HM Government**

**Standards for Safeguarding and Protecting Children in Sport 2005 - NSPCC CPSU**

**Premier League Rules: Section S 2018/19 season - The Premier League**

**Guide for Safer Working Practice - The Premier League**

**Working together to Safeguard Football - Policy & Procedures 2014 - The Football Association**

**London Child Protection Procedures**

[www.londoncp.co.uk/chapters/A contents.html](http://www.londoncp.co.uk/chapters/A%20contents.html)

[www.londoncp.co.uk/chapters/B contents.html](http://www.londoncp.co.uk/chapters/B%20contents.html)

The Club recognises its responsibility to maintain regular communication with Croydon Local authority children' services and Local safeguarding children' board, along with the LSCB of the neighbouring London boroughs, Local Authority children's services, Local Authority Designated Officer and the Police safeguarding teams. The Club Head of Safeguarding is a panel member of the Croydon Local Safeguarding Children's board and undertakes all responsibility for communications with these partner agencies, who support 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.

### **Resources and Training**

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

The key individuals are:

### **Club Head of Safeguarding**

The Clubs Head of Safeguarding 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 club across the club, academy and Crystal Palace foundation.

Manage the implementation of the club's strategy and action and implementation plan for safeguarding

Ensure club compliance with statutory obligations under relevant legislation and the Premier League safeguarding Rules.

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 club's safeguarding provision ensuring the highest standards for safeguarding vulnerable groups.

Manage the development, implementation, promotion and review of the club's safeguarding vulnerable groups' policies, practices and good practice guidelines.

Lead member of staff to manage safeguarding incidents, concerns and allegations.

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 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 a relevant action plan to the LSCB.

### **Designated Safeguarding Officers (DSO)**

The DSO's support the Clubs Head of Safeguarding to pro-actively promote and raise safeguarding awareness and assist with responding appropriately to safeguarding concerns and allegations. DSO's are based in strategic positions across the club.

The Clubs Head of Safeguarding will ensure that suitable policies and practices are in place to ensure that staff are appropriate and adequately trained to prevent or deal with safeguarding issues.

To work with the Clubs Head of Safeguarding to implement and promote the Club's safeguarding policies and procedures within their department.

Contribute to maintaining and improving the club's safeguarding provision.

Advise others working with vulnerable groups on the implementation of organisational policies and procedures to safeguard and promote the welfare of vulnerable groups.

Ensure staff understand their individual responsibilities to safeguard and promote the welfare of vulnerable groups.

Act as a source of safeguarding support and advice within their department.

Support colleagues to respond appropriately to concerns about the welfare or safety of vulnerable groups.

Promote a safe working environment.

## **Safeguarding training & inductions**

A safeguarding induction is provided to all staff. This will be delivered by the Clubs Head of Safeguarding or designated safeguarding officer. The Head Safeguarding ensures a specific Safeguarding & Safer Working Practice Induction with all new staff coming into contact with children, is completed. Key elements of the Club safeguarding policy are discussed in more detail and specifically to the individuals' role.

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. All staff will undertake online safeguarding awareness training upon employment at the club. A briefing document and guidance for safer working practices will be provided. There is an expectation that staff will read the guidance and sign a declaration of agreement and understanding. Key elements of the Club's Safeguarding Children Policy are discussed in more detail if the role requires it.

Staff in roles that require contact with adults at risk, young people and children will undergo enhanced DBS disclosure upon appointment, with re-checking every 3 years throughout the individuals association with the club.

## **Work Experience**

Crystal Palace FC may occasionally offer work experience placements to young people. The HR department arranges planned and structured work experience placements. Whilst undertaking work for the Club, those on work experience will not have unsupervised access to Children.

## **Recruitment**

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

Crystal Palace FC is registered with online disclosures to conduct DBS's on individuals who require them. **Enhanced DBS's, plus barred list check where appropriate**, enable the Club to undertake more thorough recruitment and selection procedures for positions which involve working with Children.

## **New Appointments**

All staff who are offered a position which involves working with Children will be required to complete a Self-Declaration Form and also undertake an Enhanced DBS with a barred list check where appropriate. All offers of work are subject to the outcome of the screening process and where applicable, this is set out in the initial job advertisement and the applicant's offer of work. Until such time as a satisfactory DBS has been received, the member of staff will not be permitted to work with Children.

Crystal Palace FC is committed to providing equal opportunities to staff and therefore a positive DBS will not necessarily result in a bar from work. Should a positive check be received, a risk assessment will be carried out by the Clubs Head of Safeguarding, relevant Head of Department, the HR Manager or the Crystal Palace FC Foundation CEO (or his designate), to assess the information contained within the check. The member of staff may also be asked to attend an interview prior to a recruitment decision being made. The rehabilitation of offenders act and protection of freedoms Act will be considered in all cases before a final decision is made.

### **New Appointments who already have a DBS**

If a new member of staff has been subject to a DBS check by their previous employer the Club will still require a further check.

### **Data Protection**

The Club takes the matter of Data Protection very seriously and particularly the data collected in respect of children or other vulnerable people. The Club will apply relevant legislation in respect of our data collection activities. This includes compliance in line with new GDPR rules introduced in May 2018.

Where data is collected (in writing or electronically) relating to children, or children are asked for personal details, we will make every effort to obtain consent for its use from those with parental responsibility. We will seek parental consent if the collection or use of information about a child is likely to result in:

- Disclosure of a child's name and address to a third party, for example as part of the terms and conditions of a competition entry or partnership activation;
- Use of a child's contact details for marketing purposes;
- publication of a child's image on a website that the public can view; or the collection of personal data about third parties, for example where a child is asked to provide information about his or her family members or friends.

### **Maintaining Confidentiality**

All information and documentation relating to DBS disclosures, concerns, allegations and incidents in accordance with relevant data protection legislation will be treated in confidence.

### **Equal Opportunities and Equality**

Crystal Palace FC is committed to providing equal opportunities for all staff, players and supporters. A copy of the club's policy on equal opportunities and the equality policy can be obtained from the HR department.

### **Disqualification by Association**

Crystal Palace FC works in accordance to guidance set out by The Childcare (Disqualification) Regulations 2009 ("the 2009 Regulations") are made under section 75 of the Childcare Act 2006 ("the 2006 Act") and set out the circumstances in which an individual will be disqualified for the

purposes of section 75 of the Act. Disqualification by Association dictates that Crystal Palace FC as an employer would be unable to offer employment to those living in the same household where another person who is disqualified lives or is employed (disqualification 'by association') as specified in regulation 9 of the 2009 Regulations. Failure to disclose this information can result in employment being withdrawn or terminated.

### **Activities for Disabled Persons:**

All activities carried out for disabled persons are carried out under the guidelines of the Equality Act 2010.

### **Contractors**

All external contractors engaged by Crystal Palace FC 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 safety & security 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.

### **Ratios and supervision of children**

Any activity undertaken by Crystal Palace FC 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 8 the recommended ratio should be no more than 1:8.
- For Children over 8 the recommended ratio should be no more than 1:16, but this varies depending on the Activity. Advice should be sought from the Clubs Head of Safeguarding if unsure.

- For Academy Activities, the Premier League's Youth Development Rules prescribe a ratio of 1 Coach to 8 Players (over 8s).
- For organised groups of Children attending a match day at Selhurst Park, the minimum ratio is 2 responsible adults to 20 Children.
- Where Crystal Palace FC is taking responsibility for the care of the children, parents/carers should not be included in supervision calculations.

## **Scouts**

All Scouts undertaking work for Crystal Palace FC are registered with the Football League. Those scouts who are engaged in identifying players under the age of 18 also undergo a DBS and are required to undertake the FA 3 hour Safeguarding Children Workshop.

References are sought for all Scouts and, on registration, Scouts identifying players under the age of 18 are issued with a copy of the Premier League's Premier Practice booklet on Player Recruitment, a Club Code of Conduct and the Club's Safeguarding Children Policy.

Crystal Palace FC only permits scouts from other clubs to attend its Academy Games Programme matches in accordance with the provisions of the Premier League Youth Development Rules.

## **Palace for Life Foundation**

Palace for Life Foundation is based within Selhurst Park, working closely with Croydon Council, local schools, voluntary sector and the many individuals, faith and community organisations. Their key aims are to grow the game and make it accessible for all, supporting children's development, raising the aspirations and broadening the horizons of young people, promoting health and well-being and helping young people with routes into employment.

All staff working with children and young people within the foundation have undergone the FA safeguarding workshop and enhanced DBS.

Specific codes of conduct for staff and players within the foundation are available, along with a social media policy.

## **Crystal Palace FC Academy**

The Crystal Palace FC academy aims to continue its vision and philosophy that has been installed within the last few years. The academy have a tradition and reputation for producing players that have the opportunity to play for the senior team.

The academy promotes and supports good outcomes in terms of health, development and educational achievement for its young players, and acknowledges its responsibility to set the highest football, social and academic standards. The mental well-being of all our players is taken seriously and the club will support any player to get the best suited support in the event of concerns for an individual's mental well-being. Mental health ambassadors have been trained within the club to recognise early warning signs and offer support initially.

All staff working within the academy have undergone the FA safeguarding workshop and enhanced DBS. They will all have signed agreement to abide by the guidance provided by the Premier League in safer working practices.

Specific codes of conduct for staff and players within the academy are available, along with a social media policy for staff and players.

### **Host families**

Prior to the commencement of an agreement between the Crystal Palace FC and a host family an enhanced DBS plus barred list check is carried out on the designated house parent along with as enhanced check on any other person residing at the house who is over 16 years of age.

At present Crystal Palace FC does not have any accommodation arrangements that fall within the regulations of private fostering, however in the event that a such a situation did occur then the Head of Safeguarding would ensure that suitable dialogue takes place with the relevant local authority to ensure that all statutory requirements are met.

References from previous employers and local authorities (where applicable) are also sought. House visits and full Health & Safety risk assessment are also conducted by the Head of Safeguarding or Designated Safeguarding Officer.

A Host Family Induction Evening is held at the Club on an annual basis which includes a safeguarding workshop. Regular dialogue with all host families is maintained throughout the season by a nominated member of academy staff.

### **Youth Loans, Trials & Work Experience**

If an academy player under the age of 18 joins another club on trial, work experience or a Football League Youth Loan the Academy will seek written parental consent (additional to the standard consent sought at the start of every season) prior to the activity taking place. Consideration will also be given to the player's education programme, travel and accommodation arrangements. If the new club is not located within a reasonable travelling distance from the player's current address Crystal Palace FC will request, where possible, players are placed in host family accommodation during their time away from the club and not in hotel accommodation, and as good practice the club should designate a member of academy staff to check on the players on a regular (weekly) basis, not just for game situations but for their general welfare whilst on loan, trial or work experience.

For players under the age of 18 who are joining the Club on trial (including Work Experience) parental consent will be sought prior to the trial taking place, along with a full medical history and injury disclaimer. Where accommodation is required during the trial period, this will either be in designated host family accommodation or a local designated hotel. Transportation will be arranged during the trial period via the Academy Player Care Manager or his designate.

## **U18 progression**

As players progress through the academy system they may have the opportunity to train and play with the senior team at the club. This carries a number of safeguarding considerations as they will be entering an adult provision and be susceptible to adult behaviours and language. The club will support the player(s) during this transition, and has produced guidance to assist with this process. Parents will be included and consent sought. The Clubs Head of Safeguarding will be notified when this takes place.

## **Trips and tours**

Risk assessments are carried out for all academy trips and tours, which will be shared in accordance with the Premier League rules, youth development rule 174 (appendix 12). This guidance is based on this principle and has been designed with the health, welfare and safety of all children and staff engaged in the trip and tour.

## **Transport Policy**

Crystal Palace FC have a specific transport policy to cover the Academy players.

## **Use of images**

The Club takes its guidance on the use of images from guidelines issued by the FA and Premier League. All images are taken by Club officials who have been briefed by the member of staff 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 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 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 Club and by the Premier League from time to time. Club Identification will be worn at all times.

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 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.

Any instances of inappropriate images in football should be reported to the Club's content Editor or Head of Safeguarding immediately.

### **Additional Vulnerability**

'Children' are often easily identifiable. Additional vulnerabilities are not as easy, such as; disability, ethnicity or sexual orientation for example – and may have the potential to make an individual more vulnerable. People with additional vulnerability are often even more difficult to identify and provide for. It is a priority for the Club to safeguard the welfare of both children and other vulnerable people when they are in our care and once vulnerability has been identified.

### **Language & Communication**

Some people taking part in our activities may not use English as their first language or may have trouble communicating with our workforce in the usual ways. As a principle, we will always be patient and try to communicate in an individual's chosen way and where necessary and practical we will use an interpreter (i.e. foreign language) or communicator (e.g. sign language).

### **Children from Overseas**

We will encounter children who have moved – temporarily or permanently - from their country of origin. This policy applies equally to them. We will ensure that where this situation does arise, international law and football regulations are correctly applied and that the needs of the child are put first and any arrangements are made in conjunction with those with Parental Responsibility for that child. Where we have a concern that a child may be at risk of harm, or may be being exploited or 'trafficked', the appropriate authorities will be informed at the earliest opportunity.

### **A child-centred Approach**

Effective safeguarding systems are child centred. Failings in safeguarding systems are too often the result of losing sight of the needs and views of the children within them, or placing the interests of adults ahead of the needs of children. Crystal Palace FC is committed to encouraging the voice of the child. Various methods to capture this are utilised.

### **Mascots & Ball Stewards**

The Club will only allow Children to be match-day mascots or ball Stewards 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 stewards featured in Club publications will be accompanied by personal information about the Child, such as their school, home address or local sports team.

Whilst at Selhurst Park, mascots and ball stewards are accompanied at all times by at a member of staff with a current DBS check. Staff who are responsible for mascots and ball stewards on a match-day are also required to be a designated safeguarding officer.

### **Whistleblowing Policy**

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

By encouraging a culture of openness Crystal Palace FC 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 Crystal Palace FC 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 in Crystal Palace FC issues raised by staff will be addressed quickly and effectively

Although this list is not exhaustive, examples of situations in which a disclosure might be made are:

The committing of a criminal offence.

Improper conduct or unethical behaviour

Attempts to conceal any of the above

Crystal Palace FC have a complaints policy and a discipline policy which can be obtained from the Human Resources department if required.

### **Standards of Behaviour – Adults**

Our workforce will adopt the highest standards of behaviour at all times in order that they will maintain the confidence and respect of children, other vulnerable people, parents, customers, supporters and colleagues. Within the scope of their duties their actions should always be reasonable, appropriate, warranted, proportionate, and safe, applied equitably.

### **Standards of Behaviour - Children**

We want children to enjoy themselves when they are attending our activities. We do however expect children to behave in a way that is appropriate to the age, maturity, type of activity and in a way that does not endanger or upset others. Where possible these expectations will be developed in conjunction with the participants themselves and communicated to all those taking part. In areas of the Club where player (or participant) disciplinary procedures are adopted these procedures will be communicated to all those whom they relate to including those with Parental Responsibility for a child participant.

The Club does not condone activities such as bullying, hazing, abuse or victimisation. Where such activity is suspected, reported or uncovered, this will be fully investigated and dealt with at the earliest opportunity.

### **Managing Behaviour**

The Club takes a positive approach to behaviour management and where necessary develops policies that the workforce must apply. Such policies will recognise the following general principles:

1. Every person is different and as such has individual needs;
2. Participants should be encouraged to help develop their own codes of conduct or have clear and well communicated guidance on expectations;
3. Behaviour is usually a reflection on how a person is feeling;
4. Staff should recognise that many other factors can affect behaviour – weather, hunger, medical conditions, medication and account for these in any action taken;
5. Challenging, aggressive or violent behaviour presents risks to the individual and others, and physical intervention with any individual displaying such behaviour is only ever a last resort in exceptional circumstances – any response must be reasonable and proportionate.
6. Training will be provided to members of the workforce who may experience challenging behaviour;
7. Physical punishments will never be used by our workforce, though diffusion and de-escalation techniques may when necessary; and
8. All significant incidents should be recorded and passed to the Head of Safeguarding.

### **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 abusive 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.

### **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 Clubs Head of Safeguarding 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 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 a Child's basic physical and/or psychological needs, likely to result in the serious impairment of the Child's health or development. This includes failing to provide adequate nutrition, clothing, shelter, health care and protection from harm. Emotional neglect is the failure to meet the child's ongoing emotional needs for affection and a sense of belonging.

**Emotional Abuse:**

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

**Bullying/ Cyberbullying (strand of emotional abuse)**

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical, verbal and emotional, both face to face and via social media and other online forums. The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm). All settings in which children are provided with services or are living away from home should have in place rigorously enforced anti-bullying strategies.

The Club have a specific anti-bullying policy in place to address concerns of bullying.

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, whom may suffer directly or indirectly if they live in households where there is domestic abuse. Domestic abuse is likely to have a damaging effect on the health and development of children.

## **Concerns around Radicalisation & Extremism 'Prevent'**

The Counter-Terrorism and Security Act, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers 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"). This guidance will be updated further to reflect the implications of the Prevent duty, which is expected to come into force later in 2015.

The Counter-Terrorism and Security Act 2015 will also place a duty on local authorities to ensure Channel panels are in place. The panel must include the local authority and chief officer of the local police. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the police and where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. The Act will require partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in undertaking the initial assessment as to whether a referral is appropriate. Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the Act as partners of the panel. The relevant provisions of the Act came into force on 12 April 2015 but many local authorities already have Channel panels set up in their area.

Club staff and Academy Players will undertake Prevent awareness training via appropriate training methods.

## **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.**

### **Responding to Allegations or Suspicions**

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.

Crystal Palace FC recognises and acknowledges that some children face additional vulnerabilities and extra barriers, e.g. looked after children, those with mental health issues, physical disability, children living in substitute accommodation arrangements and those with communication difficulties. The club are committed to ensuring those additional needs are met through

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 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 Head of Safeguarding or a 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 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 the Safeguarding Officer and/or the Head of Safeguarding 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 (template shown below)

**Staff should not:**

- Offer to keep any information disclosed confidential. Say there may be occasions where you have to 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 Head of Safeguarding 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) should be used to record information and pass to the Head of Safeguarding.
- Any injuries seen should be noted and recorded on a body map (which will be made available)

## Safeguarding reporting form

Please complete within 24 hours and send to

Duncan Robinson or Soye Briggs - For all concerns involving Palace for Life Foundation activities  
[Duncan.robinson@palaceforlife.org](mailto:Duncan.robinson@palaceforlife.org) or [Soye.Briggs@palaceforlife.org](mailto:Soye.Briggs@palaceforlife.org)

Michael Shea – For all concerns involving CPFC Academy activities [michael.shea@cpfc.co.uk](mailto:michael.shea@cpfc.co.uk)

Or directly to the Club Head of Safeguarding – Marcus Puddephatt.  
[Marcus.puddephatt@cpfc.co.uk](mailto:Marcus.puddephatt@cpfc.co.uk)

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

Name	
Role	
Name of venue	
Telephone number	
Email	

### Details of the person you are raising a concern about

Name	
Role (please circle)	Child Adult at risk Member of staff Volunteer Other
Date of birth	
Home address	
Telephone number	
Email	

### Details of the parents/carers (if applicable)

Name (s)	
Address	
Telephone number	
Email	

### Nature of the concern





anywhere else? (please circle)	
If yes, please detail	

**Actions**

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

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

If your concern relates to immediate welfare of a child call the Police emergency number 999, or contact the Croydon multi-agency safeguarding hub (MASH) on 0208 726 6400 or the Bromley multi-agency safeguarding hub (MASH) on 0208 461 7373 or the OOH number 0300 303 8671. For any other boroughs the relevant information will be passed on by the MASH team.

For all allegations relating to adults who work with children, please contact the Local authority designated officer (LADO) on 0208 726 6000 ext. 84322 or email [LADO@croydon.gov.uk](mailto:LADO@croydon.gov.uk)

The Head of Safeguarding should then be notified.

Safeguarding Team

Head of Safeguarding

Marcus Puddephatt

[marcus.puddephatt@cpfc.co.uk](mailto:marcus.puddephatt@cpfc.co.uk)



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