

- When providing feedback to children and young people, make sure it is constructive and encouraging as opposed to negative criticism.
- Where the club acts in loco parentis, secure written consent from parents and guardians for the administration of emergency medical treatment and first aid.
- Ensure that a written record is kept of any incidents or injuries that occur. This record should include details of the incident, any action taken and any treatment given.
- Ensure all communication with persons under 18 is conducted with parental consent. Any text messages or social media contact with children or young people must be for the sole purpose of facilitating arrangements. It is best practice to jointly communicate with the parent/carer and child.

POOR PRACTICE

The following are regarded as poor practice when working with children and all employees, workers, agency staff, volunteers must avoid such behaviour:

- Taking insufficient care to avoid injuries. For example, by excessive training or inappropriate training for the age, maturity, experience and ability of players.
- Allowing abusive or concerning practices, allegations or disclosures to go unreported or not acted upon. If you have reported the matter to the relevant person within the club and it has not been dealt with correctly, consult the procedures in this document.
- Spending unnecessary amounts of time alone with children and young people away from others.
- Being alone in changing rooms, toilet facilities or showers used by children and young people.
- Taking a child or young person alone in a car unless written consent has been obtained from the Safeguarding Team in an emergency situation.
- Taking children or young people to your home or any location where they will be alone with you.
- Sharing a room with a child or young person if at an overnight stay or tour.
- Engaging in rough, physical or sexually provocative games of any type, even those which you may consider to be simply 'horseplay' or 'banter'. This is never appropriate and should be avoided.
- Encouraging, allow or engage in inappropriate touching of any form.

- Placing children in potentially compromising and uncomfortable situations with adults (e.g. inappropriate use by a coach/ staff member of social media with a young player).
- Allowing children or young people to use inappropriate language or action without being challenged or corrected, for example hazing or bullying.
- Making sexually suggestive comments to a child or young person.
- Doing things of a personal nature that the child or young person can do for themselves.
- Ignoring health and safety guidelines as this will subject children to unnecessary risks. (e.g. allowing young players to set up goalposts unsupervised by adults).
- Giving continued and unnecessary preferential treatment to individuals.

Please note that both lists are not exhaustive but merely providing examples of the types of behaviour you should promote or avoid respectively.

WHISTLEBLOWING POLICY

The Club is committed to always acting in a manner which is ethical, fair even handed and in compliance with all laws, regulations and obligations. 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.

If unable to raise concerns internally, please consult the NSPCC Whistleblowing Helpline on 0800 028 0285.

LOST OR MISSING CHILDREN AND YOUNG PEOPLE

Every effort must be made to ensure children and young people remain either with their parents, carers or activity leaders. However, should a child or young person become lost or go missing whilst engaging with a club activity, the club will make every effort to locate the child as quickly as possible.

If the child or young person is not located within a reasonable amount of time, the club will contact the child's parents or carers and agree with them to contact the police. If the parents or carers are not available, the club will call the police directly.

A record will be kept by the Safeguarding Team of any instances in which a child or young person goes missing whilst engaging in club activities including any action taken by the club and the eventual outcome.

SEARCHING CHILDREN AND YOUNG PEOPLE

In order to ensure the safety and security of all club activities, it may be that a child or young person is subjected to the club's search process. In such instances, the preferred approach is that children and young people self-search under the supervision of the steward or security member. However, if concerns remain that the child or young person is concealing an item then consent will be sought from the parent or carer before the steward or security member conducts a search on the child while a supervisor observes.

RISK ASSESSMENTS

Activity risk assessments will be utilised for club activities. This is to minimise and prevent risks to children

and young people. Such risk assessments will take into account the particular vulnerabilities or increases risks that may occur when a child is partaking in a club activity.

SUPERVISION

The club adheres to the best practice guidance provided by the FA in relation to the supervision of children and young people when engaging in club activities. The club also recognises that the appropriate supervision can depend on the particular activity or children attending. For example, age of children attending or location of the activity.

USE OF PHOTOGRAPHY AND FILM

The club takes guidance on the use of images from the guidelines issued by the FA and the EFL. Club officials who take images will have been briefed by a member of the Safeguarding Team or by the Media and Communications Team. Prior to any images being taken of children, consent will be sought from parents and carers at the start of the season each year.

Parents and carers are responsible for informing the club of any change of circumstances within the season which may affect consent.

Parents and carers 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.

SOCIAL MEDIA

The club recognise the positive benefits of the use of social media. However, it is also aware of the potential safeguarding risks of children and young people in engaging with social media platforms.

Social media is dealt with in full in the club's Communication and Social Media Policy.

SHARING INFORMATION

The club is committed to the sharing of information to protect children, in line with Working Together 2018, the Data Protection Act 1998 and General Data Protection Act 2018.

The club will promote the 'seven golden rules' set out by the government in their guidance (Information Sharing Advice for Practitioners Providing Safeguarding Services to Children Young People, Parents and Carers):

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it—whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

REFERRALS AND CONFIDENTIALITY

Where a safeguarding concern about a child or young person arises, the club may refer these concerns to statutory and other external agencies.

Every effort will be made to ensure confidentiality is maintained for all concerned. Any information that is shared will be done so on a strictly need to know basis. This includes:

- The relevant person in the club Safeguarding Team.
- The parent or carer of the child or young person who is alleged to have been abused.
- The person who made the allegation.
- If appropriate, statutory agencies, such as the police or children's social services.
- If appropriate, external agencies, such as the FA and the Premier League.

SUPPORT FOR EMPLOYEES

The club recognises that it can be deeply upsetting when a child or young person discloses that they have suffered abuse. All members of staff have access to 24/7 wellbeing support provided by a leading private healthcare provider, this is available to help employees who have received a disclosure or who are being asked to participate in an investigation into poor practice or abuse. If you need further advice regarding this, contact the HR Team or the Senior Designated Safeguarding Officer.

REVIEW

The club will review this policy to ensure ongoing compliance with safeguarding requirements. This will occur annually, at the end of every season, or whenever there is a change in legislation, guidance, governing body rules or major safeguarding incident.

PROCEDURES

CONSENT

The primary concern in safeguarding should always be the safety and welfare of the child or young person. However, it is best practice to obtain the consent of the child concerned prior to making an external referral. Nevertheless, there are several circumstances where a referral can be made without the consent of the child. These include:

- Where the child or young person is at risk of harm.

- Other people are or may be at risk of harm.
- A serious crime has been committed or by sharing the information the crime can be prevented.
- The child concerned does not have the mental capacity to make the decision to consent to the referral.
- Sharing the information with the emergency services if it is an emergency or life-threatening situation.
- An employee, consultant, volunteer, worker or agency staff is implicated.
- The risk of harm meets the threshold for a multi-agency statutory meeting.

WHAT ACTION SHOULD YOU TAKE IF YOU SUSPECT ABUSE OR POOR PRACTICE HAS OCCURRED?

You cannot assume that someone else will act to help the child or young person as everyone holds the safeguarding responsibility.

- You must act if you have a concern about the safety and/or welfare of a child or young person.
- You must act if you have a concern about someone's behaviour towards a child or young person.

In the event of the above, you should report your concerns to one of the following:

- Head of Safeguarding.
- A Designated Safeguarding Officer.
- Senior member of staff.

ADVICE ON DEALING WITH A DISCLOSURE

What action should you take if you receive a safeguarding disclosure from a child or young person?

If a child informs you directly about their concerns about someone's behaviour towards them, this is a disclosure. This is often very difficult for a child to make, and children or young people who may be vulnerable are likely to disclose abuse to an adult they trust. It is extremely important that you know how to correctly respond to a disclosure.

Step 1

Ensure that you deal with the disclosure as it happens and make sure the immediate needs of the child are met and they feel supported. It is not your role to investigate the disclosure when it is made. Instead, it must always be taken seriously and dealt with in accordance with the club's guidance in this policy. This is the case even if the truth of the disclosure has not been verified. Your role in this situation is only to act in the best interests of the child or young person who may be at risk.

In order to do this, you should:

- Put aside your own feelings and emotions and listen calmly, even if the information is upsetting or shocking.
- Allow the child to speak freely and try not to interrupt them as this may disrupt the discussion and lead them to feel like they are being interrogated.
- Do not worry if there are silences, let the child speak at their own pace and lead the discussion.
- Do not challenge any of the information disclosed by the child.
- Try to avoid any accusatory or leading questions, let the child tell their own story of events without pushing any information, do not ask any questions that may make the child feel guilty or ashamed.
- Tell the child that you recognise how difficult the disclosure may be to them and reassure them that they are doing the right thing and you are taking it seriously.
- If physical abuse has taken place, you may observe any visible marks or bruises, but do not ask a child to remove or adjust clothing in order to observe them.
- Tell the child who you will be informing of the disclosure whilst emphasising that you will support them through the process.
- Respect the confidentiality of the disclosure by only informing those who need to know. Those who need to know are the people who have a role to play in protecting the child.

You should not:

- Document or record the conversation whilst the child is disclosing. This should be done straight away after, as accurately as you can, using the words and phrases used by the child to describe what has happened.

- Pass any judgment on what was said or give them impression that you may blame the child.
- Make false promises or promises you may not be able to fulfil to the child. For example, a promise that you will not tell anyone.
- Investigate, avenge or approach the abuser yourself.

Always keep in mind that when a child or younger person discloses, they may feel:

Guilt: It is possible they will blame themselves for the abuse and feel guilty about disclosing.

Ashamed: They may feel ashamed about the abuse itself or what their friends and family may think.

Confused: They may be confused about their feelings for the alleged abuser as it could be someone they look up to and trust. **Scared:** They may be fearful of the repercussions of disclosing the abuse or of the alleged abuse.

Step 2

Following the disclosure, if there is an immediate risk of harm, you must call the police to protect the welfare of the child.

As soon as you have ensured the immediate safety and comfort of the child or young person, you must inform the Designated Safeguarding Officer or the club's Head of Safeguarding. Their contact details can be found below.

The Head of Safeguarding will contact the appropriate statutory agencies on behalf of the club.

If you are unable to contact the Head of Safeguarding, there are other useful contacts at the bottom of this document, who can provide you with advice. Please inform them of what action was taken as soon as practicably possible.

Step 3

Please use the club's referral form whenever possible after the disclosure. To prevent you missing important details disclosed by the child, it may be helpful to make notes immediately following the disclosure to then

wherever possible, you must record information as it was told to you using the language of the child or young person rather than your own interpretation of it.

It is important to report factual information rather than assumption or interpretation. You might convey your intuitive thoughts, but these should be recognised as such and should not form part of the record.

The completed referral form must be passed immediately to the Club's Head of Safeguarding (digitally if possible) at: ***Marcus.puddephatt@cpfc.co.uk*** Any original documentation must be passed to the Head of Safeguarding to be stored securely.

WHAT HAPPENS NEXT?

You should be informed by the Safeguarding Officer what has happened following the report. If you do not receive this information, you should be proactive in seeking it out because it is everyone's responsibility to ensure that concerns are followed up.

If you have a concern that the disclosure has not been appropriately acted upon, you can inform the Senior Safeguarding Lead. The contact details can be found below. Ultimately, if you still have concerns, you should contact statutory authorities.

What action should you take where you suspect abuse but there has been no disclosure?

Sometimes a child being abused will not feel able to make a disclosure. It is therefore important to be alert to signs of abuse discussed earlier in this policy. It is still crucial that you raise a concern where something has happened to make you aware of the possibility of a safeguarding issue. For example, an adult or child may say something about themselves or another child that may alert you to a possible abusive situation. Alternatively, you may hear or witness something that gives cause for a safeguarding concern. In such situations, it is still imperative to act.

RAISING A CONCERN

Where you have a concern, but no disclosure, about any form of safeguarding poor practice or abuse, there may not be firm evidence of abuse prior to you raising a concern. When raising a concern, it is important to give as much information as possible and fully explain what exactly has caused you to hold the concern.

First, you should raise the concern with the relevant DSO who will then raise it with the Safeguarding Team. They will decide the appropriate action in light of the information you have given them.

If you feel unable to raise the concern with the DSO for whatever reason, you can raise it with the Club's Head of Safeguarding.

Following this, if you still think there is a concern, or if you feel the matter is so serious that you are unable to discuss it with the above, you should contact the Head of Safeguarding at the Premier League whose details can be found in useful contacts below.

What happens where an allegation is made against employees, workers, consultants, agency staff and volunteers?

If an allegation is made against someone who works within the club, there are three types of investigation that may occur. They are not mutually exclusive.

1. A criminal investigation by the police.
2. A child protection investigation by the local authority in a multi-agency approach.
3. A disciplinary or misconduct investigation led by the club; this may also involve the FA depending on the role of the alleged abuser.

The alleged abuser will be legally entitled to anonymity until they are either charged with an offence or they waive their anonymity. All employees involved in an investigation or are privy to such information have a legal duty to maintain confidentiality and only provide information to those that need to know.

The employee, worker, consultant, agency staff or volunteer who the allegation concerns will normally be informed as soon as possible after the result of the initial investigation is known.

If it is subsequently established that the allegation was false or malicious, on the basis of further investigation, a written record will be made of the decision detailing the justification for the decision. The person whom the complaint has been made against will normally be informed and the matter will be closed. Allegations that are found to be false or malicious will be removed from personnel records and not referred to in any reference.

Where a criminal investigation is continued, the person concerned will be suspended on full pay if no reasonable alternative. The reasons and justifications for suspension will be recorded.

In the event that a member of staff is dismissed or resigns in circumstances where s/he might otherwise have faced dismissal for a safeguarding related reason, the Head of Safeguarding will act in accordance with FA regulations and DBS guidelines and make the necessary referral to the DBS, the FA and the Premier League as appropriate.

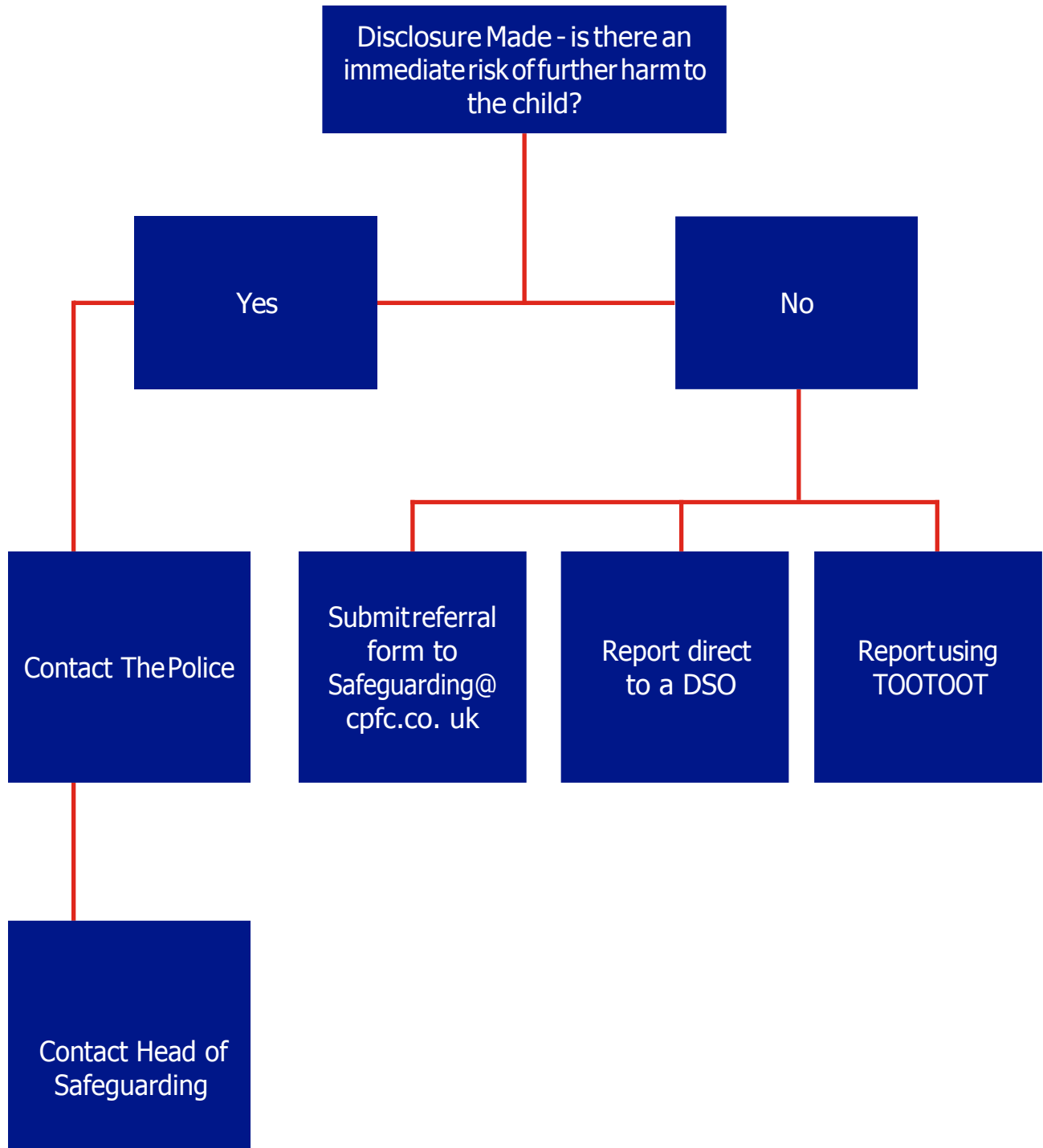
What happens where an allegation is made against a child or young person?

Any allegation concerning the abuse of a child or young person perpetrated by another child or young person should be dealt with through this policy and its procedures. If you have safeguarding concerns or a disclosure that a child or young person has committed abuse, then you should report it immediately to the DSO or Head of Safeguarding who will, conduct full risk assessment and where necessary, seek advice from the local authority on the matter.

All children involved, whether perpetrator or victim, will be considered as being at risk. A thorough risk assessment of the situation will be conducted with the view to ensuring the safety and best interests of all children involved. Both alleged victim and alleged perpetrator would receive appropriate support. It will also be considered whether the alleged abuser can continue engaging in activities with the club. This will be decided on the probability of risk to others.

Head of Safeguarding	Marcus Puddephatt	Marcus.puddephatt@cpfc.co.uk
DESIGNATED SAFEGUARDING OFFICERS		
Academy	Susan Jackson	Susan.jackson@cpfc.co.uk
Palace for Life Foundation	Duncan Robinson	Duncan.robinson@palaceforlife.org
Matchdays	Elma Gredelj	Elma.gredelj@cpfc.co.uk
Crystal Palace Women	Paula Johnson	Paula.johnson@cpfc.co.uk
The Club	Elma Gredelj	Elma.gredelj@cpfc.co.uk
EXTERNAL SAFEGUARDING CONTACTS		
Premier League Head of Safeguarding	Jessica Addicott	Safeguarding@premierleague.com
Surrey County FA (County Welfare Officer)	Phil Rendell	Phil.rendell@surreyFA.com
The FA Safeguarding Team		0800 169 1863 safeguarding@thefa.com
Police		101 (non-urgent calls) / 999 (emergencies)
Multi-Agency Safeguarding Hub (MASH) (First point of contact for members of public with safeguarding concerns)		0208 2552888 Emergency out of hours social work service 0208 7266400 childreferrals@croydon.gov.uk
Croydon Safeguarding Children Board (CSCB)		0208 6047275
The Local Authority Designated Officer (LADO) for Croydon Council. (Responsible for the oversight and management of allegations made against employees). LADO should be informed of all allegations that come to an employer's attention.	Steve Hall	LADO@croydon.gov.uk 0208 2552889
KEY SAFEGUARDING CONTACTS		
NSPCC		0808 800 5000 (24-hour helpline) help@nspcc.org.uk www.nspcc.org.uk
Child Line		0800 1111 2417 www.childline.org.uk
Child Protection in Sport Unit		0116 234 7278 cpsu@nspcc.org.uk www.thecpsu.org.uk
CEOP Centre Child Exploitation and Online Protection		www.thinkuknow.co.uk www.ceop.police.uk

DISCLOSURE DIAGRAM



CLUBS INVESTIGATION PROCESS TO BE OVERSEEN OR COMPLETED BY HEAD OF SAFEGUARDING

1. Allegation received- Consider immediate safety of any child.
2. Risk assessment completed
3. Parents/Carers notified (unless risk of further harm)
4. Affiliated Football referral form submitted if relevant. FA & PL notified within 48 hours
5. LADO informed
6. HR Lead notified (if member of staff)
7. Review
8. Set investigation strategy – Considerations: Witnesses, CCTV, Specialist interview requirements (ABE),
Time frame, HR policies, Human rights, proportionality and necessity.
9. Conduct Investigation
10. Review and consider independent review at this stage.
11. Further investigation Yes or NO?
12. Conclusion

