



Crystal Palace Football Club

Adults at risk safeguarding policy

Statement from the Board

The safety and welfare of adults at risk 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 adults at risk 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.

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 adults at risk, 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 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 adults board.

To safeguard all adults at risk who interact with the Club.

To demonstrate best practice in safeguarding adults at risk.

To provide protection for adults at risk who receive services from Crystal Palace Football Club.

To provide staff and volunteers with guidance on procedures they should adopt if they suspect an adult at risk may be experiencing, or be at risk of harm.

To ensure that coaches, parents and other adults who come in contact with adults at risk 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, 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 Foundation. 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.

Adult at Risk – An adult (person aged 18 or over) who is receiving 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 or Conveying (due to age, illness or disability in prescribed circumstances)

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 is minimised; the health or wellbeing of Vulnerable groups is not impaired when engaging in Club or Foundation 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.

Rules, Regulations and Guidance

The Club is governed by the legislation and rules/ regulations set out by several key governing agencies including the Government, Football Association and Premier League. The content of this policy is underpinned by the following legislative documents and polices.

Safeguarding Vulnerable Groups Act 2006 - HM Government

Human Rights Act 1998 – HM Government

No Secrets 2000 – Department of Health

Mental Capacity Act 2005

Care Act 2014

Equality Act 2010 – HM Government

The Club recognises its responsibility to maintain regular communication with LSCB along with the LSAB, Local Authority adults’ 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.

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 Club Head of Safeguarding has responsibility to oversee and direct the safe provision of all activities and associated training relating to adults at risk. 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 Leagues 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.

Designated Safeguarding Officers (DSO)

The DSO's support the Club 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 Club's 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 Club 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 and induction

A safeguarding induction is provided to all staff. This will be delivered by the Club Head of Safeguarding or designated safeguarding officer. The Head of Safeguarding holds a specific Safeguarding & Safer Working Practice Induction with all new staff coming into contact with adults at risk. Key elements of the Club safeguarding policy are discussed in more detail and specifically to the individuals' role. 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 adults at risk 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 Football Club may occasionally offer work experience placements to adults at risk. 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 Football Club 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 Football Club 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 adults at risk.

New Appointments

All staff who are offered a position which involves working with adults at risk will be required to complete a Self-Declaration Form and 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 a satisfactory DBS has been received, the member of staff will not be permitted to work with adults at risk.

Crystal Palace Football Club 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 Head of Safeguarding, relevant Head of Department, the HR Manager or the Crystal Palace Football Club 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.

Temporary Staff and External Consultants

Crystal Palace Football Club will ensure that all temporary staff and external consultants sign a self-declaration Form where appropriate and, in any case, will not have unsupervised access to adults at risk during their time with the club.

Equal Opportunities and equality

Crystal Palace Football Club 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.

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 Football Club 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 adults at risk and give details of the club's expected code of behaviour. Contractors are subject to regular inspection from club staff.

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 adults at risk.

Definitions of Poor Practice and Abuse

Poor Practice is unacceptable and will be treated seriously with appropriate action. Any behaviour that contravenes existing Codes of Conduct, infringes an individual's rights and/or reflects a failure to fulfil the highest standards of care is an indication of Poor Practice. An adult at risk 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 a violation of an individual's human and civil rights by another person or persons. Abuse may consist of a single act or repeated acts. It may be physical, financial, verbal or psychological or an act of neglect or omission to act. It may occur when an adult at risk is persuaded to enter a financial or sexual transaction to which s/he has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

Signs of abuse

There are five main forms of abuse identified as follows, should you have any concern that abuse is occurring you should contact the 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 an adult at risk.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in an adult at risk.

Physical abuse can be caused through an act or omission.

Sexual Abuse:

Sexual abuse involves forcing or enticing an adult at risk 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 can be perpetrated by anyone, including a parent or guardian, caregiver, extended family, friend, neighbour, stranger or a person in a position of trust.

Neglect:

Neglect is the persistent failure to meet an adult at risk's basic physical and/or psychological needs, likely to result in the serious impairment of health or development. This includes failing to provide adequate nutrition, clothing, shelter, health care and protection from harm.

Emotional Abuse:

Emotional abuse is the persistent emotional maltreatment of an adult at risk such as to cause severe and persistent adverse effects on the emotional development, including verbal attacks on their sense of self, repeated humiliation or rejection. Exposure to violence, drugs, alcohol abuse or severe conflict in the home, forced isolation, restraint or causing an adult at risk 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 adult at risk is being treated over a significant period of time.

Financial abuse:

Financial abuse can range from failure to access benefits, through inadvertent mismanagement and opportunistic exploitation to deliberate and targeted abuse, often accompanied by threats and intimidation. It can include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, overcharging or carrying out unnecessary work, or the misuse or misappropriation of property, possessions or benefits.

Alerts to financial abuse

Financial abuse is the main form of recorded abuse amongst adults at risk. Financial abuse can occur in isolation, or as research has shown, where there are other forms of abuse, there is likely to be

financial abuse occurring also. This is not always the case but staff should be aware of this potential. Indicators of financial abuse include:

Change in living conditions

Possessions sold

Inability to pay bills/unexplained shortage of money

Unexplained withdrawals from an account

Unexplained loss/misplacement of financial documents

Isolation from family/friends/social network

Carer's enhanced lifestyle

Sudden changes in bank account or banking practice

Unauthorised withdrawal of funds using the vulnerable person's ATM card, or changes in patterns of usage.

Sudden or unexpected changes in a will or other financial documents.

The above are illustrations of potential indicators of abuse. It does not mean that it is proof of actual abuse but may require further scrutiny. It is not an exhaustive list.

Remember: 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.

The Care Act 2014

The Care Act came into force in April 2015 and places further obligations upon statutory agencies relating to care and support for adults and the law relating to support for carers; to make provision about safeguarding adults from abuse or neglect; to make provision about care standards; to establish and make provision about Health Education England; to establish and make provision about the Health Research Authority; to make provision about integrating care and support with health services; and for connected purposes.

The Mental Capacity Act 2005

The Mental Capacity Act 2005 provides a statutory framework to empower and protect people who may lack capacity to make decisions for themselves and establishes a framework for making decisions on their behalf. This applies whether the decisions are life-changing events or everyday matters. All decisions taken in the safeguarding process must comply with the Act.

The Act says that: ***"... a person lacks capacity in relation to a matter if at the material time he is unable to make a decision for himself in relation to the matter because of an impairment of, or disturbance in the functioning of the mind or brain."***

The presumption is that adults have mental capacity to make informed choices about their own safety and how they live their lives. Issues of mental capacity and the ability to give informed

consent are central to decisions and actions taken by statutory agencies working with adults at risk. All interventions need to take into account the ability of adults to make informed choices about the way they want to live and the risks they want to take.

It is not for Crystal Palace Football Club staff or volunteers to make a decision about whether an adult at risk lacks capacity, but it is useful for professionals to have an understanding of the notion of capacity as explained below.

Definition

Capacity is the ability to make a decision at a particular time. The starting assumption must always be that a person has the capacity to make a decision, unless it can be established that they lack capacity. The term 'lacks capacity' means a person who lacks judgement or understanding to make a particular decision or take a particular action for them at the time when the decision or action needs to be taken. This reflects the fact that some people may be unable to make some decisions for themselves, but will have capacity to make other decisions. I.E they may be able to make small decisions about everyday matters such as what to wear or what to eat but lack capacity to make more complex decisions about financial matters. It also reflects that a person who lacks capacity to make a decision at a certain time may be able to make that decision at a later date – this may be due to illness or accident.

Consent Issues

If concerns arise consent must be obtained from the individual concerned before a referral is made to Adult Services or the police. However, if others are at risk of harm the information should be passed to Adult Services or the police even if consent is not obtained. Information about an individual should not be given to family or carers without consent of the individual. If concerns arise and the individual is unable to give consent to information sharing a referral should be made to statutory agencies. Family/carers should only be informed if this does not place the person concerned at risk of harm.

Staff should seek guidance from the Club Head of Safeguarding if they are unsure.

Responding to Allegations or Suspicions

All staff, volunteers and players have a responsibility to ensure the safety and welfare of adults at risk and to take appropriate steps to ensure that suspicions and allegations of abuse are taken seriously and responded to quickly and appropriately. It is not the responsibility of anyone within the club to decide whether or not abuse has taken place.

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 multi-agency investigation/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.

If the concern or allegation relates to the Head of Safeguarding or any senior member of staff, contact directly the Croydon Local Authority Designated Officer for Allegations against Professionals (LADO) LADO@croydon.gov.uk

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

Staff should:

Listen carefully rather than question the adult at risk directly.

Stay calm and not offer their personal opinions/thoughts.

Be aware that medical or criminal evidence may be relevant.

Tell the individual that you are listening and taking what they say extremely seriously.

Seek medical attention if necessary

Take further action – they may be the only person in a position to prevent future abuse.

Inform 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 all information disclosed confidential. Say there may be occasions where you have to pass the information to the Police or other adult (Check on individual circumstances with the Club Head of Safeguarding)

Make promises they cannot keep

Interrogate the adult at risk – it is not their job to carry out an investigation.

Cast doubt on what the adult at risk has told them – they shouldn't interrupt or change the subject

Say anything that makes the adult at risk 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

Soye Briggs & Duncan Robinson- For all concerns involving Palace for Life Foundation activities.

SoyeBriggs@palaceforlife.org

DuncanRobinson@palaceforlife.org

Or directly to the Club Head of Safeguarding Marcus Puddephatt.

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

Circumstances (Include ALL of the information known to you)	
Details of any disclosures (Include ALL of the information known to you, including any verbatim comments)	
Injuries seen	

Witnesses (include full details, including name, role and contact details)	
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Confidentiality

If the allegation is against a member of staff or volunteer, that person should not be informed of the concern until advice has been sought from the Head of Safeguarding.

Have the parents/carers been informed of the concern? (please circle)	Yes	No
If not, please state why (If you feel sharing the information with the parent/carer will place the child at risk, you should not share this information. Advice should be sought from the Head of Safeguarding and reasons fully documented. Adults at risk need to be informed of the concern).		
If not, please state why (If you feel sharing the information with the parent/carer will place the child at risk, you should not share this information. Advice should be sought from the Head of Safeguarding and		

Actions

What has been done about the concern?	
Who has been informed about the concern? (please circle)	Head of Safeguarding Safeguarding officer (please name) FA/Premier League Police Adult social care team Local authority designated officer Other, please detail

What other actions have been taken?	
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Safeguarding Team

When were they notified?	
What was the name of the person you spoke to?	

What did they say?	

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 or adult at risk call the police on 999. The Head of Safeguarding should then be notified.

Club Head of Safeguarding

Marcus Puddephatt

marcus.puddephatt@cpfc.co.uk

Staff should inform their Manager in addition to the Head of Safeguarding or Designated Safeguarding Officer as soon as possible.

Confidentiality:

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only. This includes:

The Head of Safeguarding, the Safeguarding Officer and HR Manager.

The parent/carer of the person who is alleged to have been abused (if appropriate)

The person making the allegation.

Local Authority and Police.

Dependent on role, the National Governing Body.

No contact should be made with the alleged abuser. Advice must be sought from the Local Authority and Club Head of Safeguarding

Information will be processed, disclosed and stored in line with the Data Protection Act 1998.

Whistleblowing Policy

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

By encouraging a culture of openness Crystal Palace Football Club wants to encourage staff to raise issues, which concern them at work. Staff have a right and duty to raise matters of concern they may have about the services being offered by Crystal Palace Football Club 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 Football Club 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 Football Club have a complaints policy and a discipline policy which can be obtained from the Human Resources department if required.

Monitoring

The policy will be reviewed yearly, or in the following circumstances:

Following a recommendation within a serious case/Domestic homicide review and/or from the LSAB or any other regulatory body.

Amendments to existing legislation, introduction of new legislation and/or government guidance.

As a result of any other significant change or event.