



# SAFEGUARDING POLICY

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FEBRUARY 2025  
REVIEW: FEBRUARY 2026



*Our safeguarding mission is to provide a safe, positive and enjoyable environment for all involved with Crystal Palace Football Club. We will work together to empower and protect individuals, listen and respond to their needs to ensure safeguarding is embedded throughout the Club.*

### **Words from our respective Chairmen**

We are 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.

We care about the well-being of individuals, and our policies help to ensure everyone has access to the opportunities that Crystal Palace and its Foundation 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, Crystal Palace Football Club

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Paul Cleal OBE

Chair Palace for Life Foundation

A handwritten signature in black ink, reading 'Paul Cleal', with a period at the end.



1.	<b>INTRODUCTION</b>	04
2.	<b>SCOPE AND GOVERNANCE OF POLICY</b>	04
3.	<b>KEY POLICY PRINCIPLES</b>	05
4.	<b>ROLES AND RESPONSIBILITIES</b>	05
5.	<b>RECRUITMENT AND DISCLOSURE OF CRIMINAL RECORD</b>	07
6.	<b>TRAINING</b>	08
7.	<b>SAFEGUARDING CHILDREN</b>	09
7.1	Definitions	
7.2	Legislation	
7.3	Ratios / Supervision of children	
7.4	Match Days	
7.5	Use of Images	
7.6	Risk Assessment	
7.7	Academy	
7.8	Recruitment Team (Scouts)	
7.9	Host Families	
7.10	Palace for Life Foundation	
7.11	Signs and indicators of abuse	
7.12	Recognising, Responding to and Recording concerns and allegations	
7.13	Reporting and Referring concerns, allegation and poor practice	
7.14	Allegation of abuse by CPFC / Palace for Life employees or volunteers	
7.15	Low level concerns and poor practice	
7.16	Confidentiality	
8.	<b>SAFEGUARDING ADULTS</b>	27
8.1	Definitions	
8.2	Legislation	
8.3	Principles of safeguarding adults	
8.4	Mental Capacity Act 2004	
8.5	Prevent Duty	
8.6	Wellbeing and Welfare – Supporting adults who are not deemed ‘at risk’	
8.7	Palace for Life Foundation	
8.8	Risk Assessments	
8.9	Signs and indicators of abuse	
8.10	Poor practice	
8.11	Consent and reporting concerns, allegations and poor practice	
8.12	Allegations of abuse by CPFC / Palace for Life employees or volunteers	
8.13	Non-recent allegations	
8.14	Confidentiality	
9.	<b>APPENDIX</b>	39
9.1	Key Contacts	
9.2	External Contacts	
9.3	Safeguarding Reporting Form	

## 01 INTRODUCTION

Crystal Palace Football Club (CPFC / 'the Club') and Crystal Palace Foundation Palace for Life (the Foundation) are committed to providing a safe, inclusive and welcoming environment whilst ensuring the protection and welfare of all children, young people and adults at risk. All people have the right to be protected from abuse regardless of their age, gender, disability, sexual orientation, race, religion or belief.

### MISSION

Our safeguarding mission is 'To provide a safe, positive and enjoyable environment for all involved with Crystal Palace Football Club. We will work together to empower and protect individuals, listen and respond to their needs to ensure safeguarding is embedded throughout the Club.'

The Club believe that safeguarding is everyone's responsibility and that all adults working within the club, in any capacity, have a duty and responsibility to safeguard the welfare of all vulnerable people, including both children and adults at risk. Adults who work with young and vulnerable people are, by default, placed in a position of trust that carries authority, status, power and, most importantly, responsibility. The Club aspiration is that all adults affiliated with the Club will display high moral and ethical standards and behave as positive role models at all times. To achieve this the Club implement policies, procedures and best practice guidance. The Club also engages with the Premier League, FA and Local Authority partners who support the Club in promoting the safety and welfare



of all who engage in activities with the Club, allowing them to enjoy any Club activity in a safe, inclusive and person-centred environment.

## 02 SCOPE AND GOVERNANCE OF THE POLICY

This policy is to inform and guide people on the procedures and requirements relating to safeguarding both children and adults at risk at the Club. This includes all permanent, temporary and casual employees, volunteers, agency employees and contractors. The requirements of this policy are mandatory to all and are to be enforced in all cases where there are any suspected instances of poor practice or abuse. This policy extends to cover our supporters and those who attend events held by the Club.

All activities undertaken by the Club or the Foundation, regardless of location, fall under the remit of this policy. This policy should be read and applied in conjunction with other relevant Crystal Palace FC policies and



guidance. This policy replaces previous safeguarding policies but remains working in partnership with all existing Club HR policies.

### 03 KEY POLICY PRINCIPLES

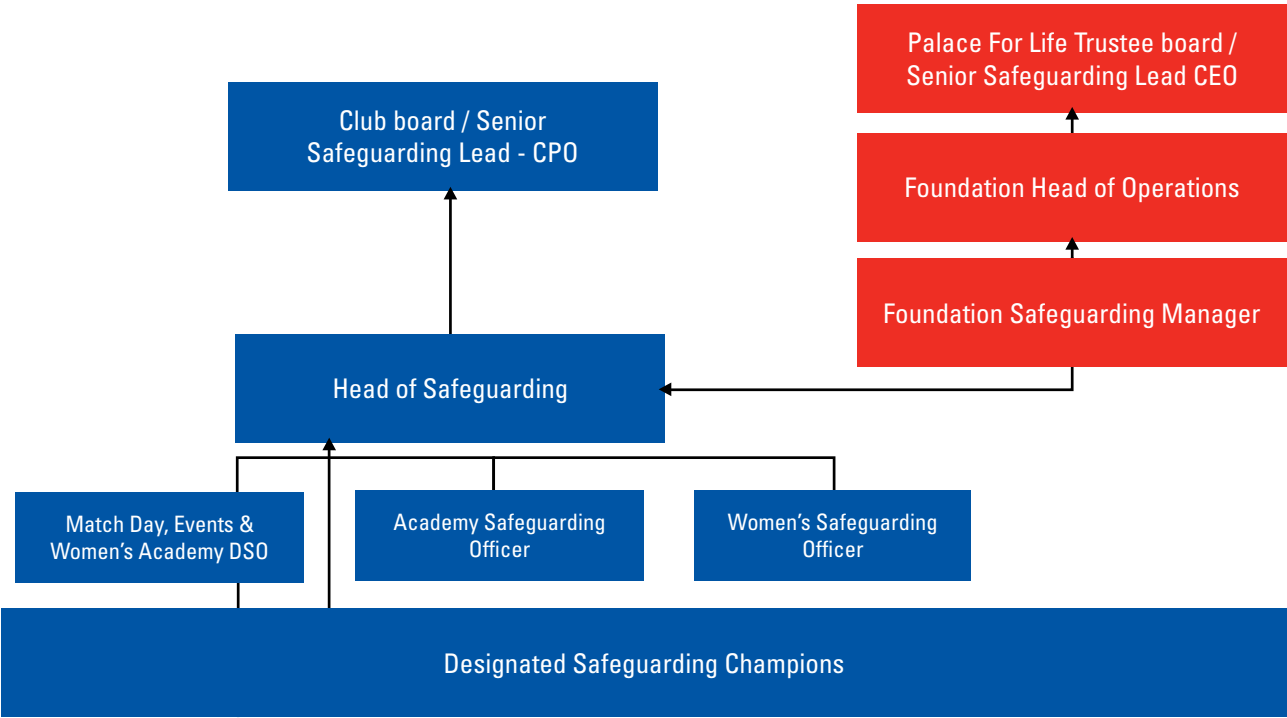
- The welfare of all children and adults at risk is of paramount concern, regardless of whether they are accessing our activities or not.
- All people regardless of age, sex, gender reassignment, disability, race, Religion or belief and sexual orientation, marital / civil partnership status or pregnancy / maternity status have the right to be protected from harm.
- Crystal Palace FC and the Foundation will work in partnership with other agencies to promote the welfare and protection of young people and adults at risk. This includes working with or referring to statutory agencies where appropriate.
- All employees, volunteers, agency employees and contractors understand that safeguarding is everyone’s responsibility and that by adhering to

the policy, their own interests will be protected.

### 04 ROLES AND RESPONSIBILITIES

Safeguarding is widely recognised as being everyone’s responsibility and at Crystal Palace FC and the Foundation, there are dedicated employees who hold day to day oversight and management of the safeguarding function, in compliance with the Premier League rules S.3. and S.4. The Senior Safeguarding Lead at the Club is the CPO and the Senior Safeguarding Lead for the Foundation is the CEO.

The Head of Safeguarding manages a team covering the Club and the Academy, and acts to support the Palace for Life Foundation Safeguarding function. There are a number of Designated Safeguarding Champions throughout the Club who, in addition to their regular role, act as first point of contact for safeguarding support and guidance.



**Club Board Safeguarding Lead – Chief People Officer**

The Club CPO is the Board/Senior Safeguarding Lead for the Club and responsible for all aspects of the Club and ensures that safeguarding is a priority for the Board.

**Foundation Safeguarding Lead – Chief Executive Officer**

The Palace for Life Foundation CEO is the Board/ Senior Safeguarding Lead for the Foundation and is responsible for ensuring that safeguarding is a priority for the Foundation and the Board.

**Head of Safeguarding**

This role has overall responsibility for the safeguarding provision across the Club, acting in accordance with S3 and S4 of the Premier League Youth Development rules. This role is responsible for receiving allegations and concerns, determining appropriate action and making referrals where necessary. This role provides support, supervision and guidance to the Foundation Safeguarding team.

**Academy Safeguarding Officer**

This role is Academy based and acts as the first port of call for any Men's Academy related issues or concerns relating to safeguarding or the welfare of Academy players.

**Foundation Safeguarding Manager**

This role is responsible for the oversight and day to day management of the safeguarding provision within the Foundation, with support provided by the Club Head of Safeguarding.

**Women's Safeguarding and Wellbeing Officer**

This role is responsible for the day to day management of the Women's first team safeguarding and wellbeing concerns, training and oversight.

**Match Day, Events & Women's Academy DSO**

This role is Academy based and acts as the first port of call for any Academy related issues or concerns relating to safeguarding or the welfare of Academy players. The postholder is also the Designated Safeguarding Officer for Match days and events held at Selhurst Park.

**Designated Safeguarding Champions (DSC)**

There is an extended network of DSC's at the Club, Academy and Foundation who support the safeguarding function by acting as the first point of contact for safeguarding issues or concerns. The DSC's provide support and refer all concerns and allegations to the Head of Safeguarding who will determine appropriate course of action.

*Contacts for all Safeguarding team members can be found in Appendix 9.1.*



## 05 RECRUITMENT AND DISCLOSURE OF CRIMINAL RECORD

recruiting managers are trained in safer recruitment processes and procedures, to support safer working practices

The Club and Foundation operate within best practice and safer recruitment guidelines to ensure we take all steps to prevent unsuitable individuals from working with, having access to or influence over children and vulnerable people. The Club and Foundation ensure

The Club and Foundation are committed to these procedures by implementing the following actions in every case of recruitment, including applicable volunteer and host family roles:



## **CRIMINAL RECORD CHECKS [DISCLOSURE AND BARRING SERVICE [DBS] CHECKS]**

The Club is registered with First Advantage Group, as per recommendation of the FA, who process criminal record checks on behalf of the Club. The Club is required to obtain criminal record checks (referred hereon as DBS checks) on all potential employees and volunteers who may work with children and young people. The level of the DBS check will be determined by the role and where applicable Enhanced plus Barred lists checks will be obtained. DBS checks will be renewed for all employees and volunteers every three years.

Palace for Life employees are asked to register for the DBS update service, where possible, which is checked annually.

The Club requires all agency and temporary employees, volunteers, host families and consultants working with children or adults at risk to sign a criminal record self-declaration form, which will provide the opportunity for a disclosure of any criminal history they may have.

Any roles that require any employee, including volunteers, to attend CPFC sites that give access to children or adults at risk must have a satisfactory Enhanced DBS with barred list checks. If the Club engages with external agencies and contractors, it is their responsibility to ensure all the necessary DBS checks are complete and satisfactory and that this requirement forms part of the service level agreements with partnership and commissioned services.

## **POSITIVE DISCLOSURE**

If a DBS check is returned with content, which has not been removed by the filtering process, the Club's Head of Safeguarding or Foundation Safeguarding Manager will initiate a risk assessment to consider the information provided on the DBS check and the suitability of the person to work with children and/or adults at risk, giving due consideration to the requirements of role, and the nature of the offences and sentencing. The person may be required to attend a risk assessment meeting and the conclusion of the risk assessment may impact the recruitment decision being made. Any decisions will be made in compliance and with reference to the Rehabilitation of Offenders Act 1974 and Protection of Freedoms Act 2012.

## **06 TRAINING**

All permanent employees must complete the mandatory safeguarding training courses provided by Crystal Palace FC and the Foundation. All employees will receive a safeguarding induction when they come into post. Employees are required to refresh their training every year. Academy employees working directly with children or those who have FA affiliated roles must also attend the FA approved safeguarding course.

Members of the safeguarding team, including DSC's, will be required to complete additional training commensurate with the role and ensure this is refreshed regularly to remain up to date with legislation and current best practice guidance. A failure to engage with additional training will impact the ability to safely carry out the DSC role.



For agency, temporary and casual employees, an induction training session is required and arranged by HR, where the policy and procedures for raising concerns will be addressed and appropriate contact details provided.

All employees, regardless of length of service, should know what constitutes a safeguarding concern and how to raise this in accordance with the policy and procedures.

All players, regardless of age or gender, are also provided with safeguarding information including key contacts, what constitutes a concern and how to report a concern.

## 07 SAFEGUARDING CHILDREN

### 7.1 DEFINITIONS

**Child:** Any person under 18 years old. The term 'child / children' refers to all children and young people under the age of 18 years.

**Safeguarding:** The action taken to promote welfare and protect people from harm. This includes protecting children from maltreatment, preventing the impairment of health or development, ensuring children can grow up in safe and effective care and taking action to enable children to have the best outcomes.

**Child Protection:** This is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. All organisations working with children have a

duty to safeguard them and report concerns of harm or abuse to statutory authorities.

**Abuse:** Child abuse is when a child is intentionally harmed by an adult or another child. It can be over a period of time or be a one-off action. It can be physical, sexual, emotional and it can happen in person or online. It can also be a lack of love, care and attention, which is neglect. (NSPCC 2020) Further information about the signs and indicators of abuse can be found in 7.11.

**Disclosure:** The act of a child informing someone that abuse is occurring. This can be direct or indirect through play or art. However, this assumes the child is aware that the behaviour is abusive and is actively seeking to inform others. The term 'disclosure' also implies a one-off event and excludes children with communication needs and those who are non-verbal or have a language barrier. Where possible, the term 'Disclosure' is avoided in this policy and 'Allegation' or 'Concern' used in its place.

**Allegation:** A statement that someone has done something wrong, without providing proof.

**Safeguarding Concern:** Information provided or something seen or heard which indicates that a child's safety or wellbeing is at risk.

**Low Level Concerns:** Where behaviour or actions cause concern but do not necessarily meet the threshold of abuse.

**Poor Practice:** Any action or behaviour by employees which is contradictory to recognised good practice or the Club Code of Conduct. Poor practice which is allowed to continue can cause harm and can become abuse.

**Whole Family and Child centered approach:**

Strengthening multi-agency working across the whole system of help, support and protection for children and their families, keeping a child-centred approach while bringing a whole-family focus, and embedding strong, effective and consistent multi-agency child protection practice

## 7.2 LEGISLATION AND GUIDANCE

All Crystal Palace Football Club and Palace for Life Foundation employees and volunteers are required to adhere to policies and procedures relating to child safeguarding practice. The policy and aim is to safeguard and promote the welfare of children in accordance with the legislation and guidance, including but not limited to:

- Children Act (1989 & 2004) (England and Wales)
- Equality Act (2010)
- Human Rights Act (1998)
- UN Conventions on the Right of Child (UNCRC) (1989)
- Rehabilitation of Offenders Act (1974)
- Premier League Safeguarding Standards (2024-2025)
- Affiliated Football Safeguarding Policy and Procedures (2014)
- FA Safeguarding Procedures
- Premier League rules and Safer Working Practice guidance

- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (2024)
- PLCF / EFL Capability Code of Practice (2022-2025)
- Green Guide (Sports Ground Safety Authority)
- Local area safeguarding procedures
- London Child Protection Procedures and Practice guidance (2024)
- Safeguarding Disabled Children (2009)
- Safeguarding Vulnerable Groups Act (2006)

Each Local Authority Children Social Care team has its own threshold document which outlines at what point Social Care may become involved. These documents are available on the individual Local Authority websites. The Club and Foundation will work with the relevant Local Authorities.

## 7.3 SUPERVISION OF CHILDREN

Any activities planned and delivered by the Club, Academy or the Foundation will give due consideration to the appropriate ratio of adults to children in order for the activity or event to be safe.

Usual best practice requires a minimum of two members of staff from the Club or the Foundation, with appropriate DBS checks, to supervise any event or activity. It is recognised that there will be some circumstances where this is not appropriate or feasible, due to the nature of the work i.e. medical appointment, home visit, mentoring. However, these incidences of lone working should not take place without prior knowledge of the Club or Foundation and employees are expected to work in an open and transparent manner and maintain professional boundaries at all times.



The FA provide guidance to direct the appropriate ratios of adults to children and this varies dependent upon the age and number of children present.

## **FOUNDATION RATIOS**

For all activities, there are a minimum of two coaches in attendance, and this number increases dependent upon the number of children present, their ages and any additional needs.

Where the Foundation are delivering a programme within an education environment, the Service Level Agreement between the Foundation and the school will state that a minimum of two employees are required to be present, but one could be provided by the school. Where the Foundation provide programmes for children with additional needs in schools, the ratio tends to increase dependent upon the number of participants and should always include school employees.

If there is a need to provide one to one work in order to deliver a specific programme i.e. Team Mates and Targeted Intervention, prior consent will be obtained from the parents, child and school if applicable.

When delivering programmes in schools, Foundation coaches will follow the school's safeguarding procedures and escalation process. Coaches will, in addition, also report the concern to the Foundation Safeguarding Manager.

## **LOST CHILDREN**

If during the course of a planned Club or Foundation activity, event or trip a child becomes separated from the group or lost, the Club will act swiftly to locate the

child. If the child is not located within a reasonable amount of time, staff will contact the child's parents or carers and agree notification to the Police. If the parents are uncontactable, the Club will contact the Police directly.

During a home game at Selhurst Park, if a child is reported as missing or presents as lost, the Event Safeguarding Officer (ESO) on call must be informed and will support the Safety Officer, Club Stewards and Security to attempt to locate the child or the parent/carer. Where the child or parent/carer is unable to be located, the Club Police Liaison Officer will be informed. Supporters are encouraged to use wrist bands, which are available from the information point at Selhurst Park, to detail contact numbers, which would assist with locating parents/carers if the child becomes separated or lost. If parents are located, the ESO will need to be present to determine any further information is needed to be obtained. All details will be reported on the Clubs online safeguarding management system. MyConcern.

Any incidences of lost or missing children must be reported to the Head of Safeguarding who will determine whether a follow up investigation is appropriate.

## **7.4 MATCHDAYS**

Children over the age of two years are welcome to attend Selhurst Park with parents or carers to watch a match but must purchase a ticket.. Children over the age of 14 years can attend a match unaccompanied. Children 13yrs and under must be accompanied by a responsible adult. Children under 2 years can attend

with a parent or carer, provided a written request has been submitted to the Head of Safety prior to the game and authorization received.

On Match days there is an Event Safeguarding Officer (ESO) available to manage any arising incidents or concerns. Contact details of this person will be provided in the pre-match briefing.

The Disability Liaison Officer and the ESO will be informed in advance by the away Club of any supporters travelling to the game who may require additional safeguarding measures to be implemented.

The Club also provides a match day text alert system for Supporters to report immediate incidents and concerns of anti-social behaviour directly to the Control Room. This information is recorded by the Match Day Safety Officer and actioned accordingly.

## **SEARCH OF CHILDREN AND ADULTS AT RISK.**

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 approach is that children and young people self – search under the supervision of the steward or security member, with the ESO present. However, if concerns remain that the child or young person is concealing an item then advice from the Police may be taken. Stewards should not touch a child during a search and should refer to the event safeguarding plan for full procedures on searching of an under 18.

## **BALL STEWARDS / MASCOT'S**

Children in attendance on Match days to act as ball stewards or mascots will be led and supervised by dedicated Club representatives. Prior consent and emergency contacts details will be obtained from parents / carers and the children will be notified of the group leader should any issues arise. All children will be registered in and signed out to the accompanying parent.

Where a child is not collected at the end of the event, the ESO will be notified, and the emergency contacts will be telephoned. Where the parent is unable to be contacted, the Police will be notified for assistance. It is noted that Mascots are accompanied by their parents/carers who remain in the Stadium throughout the experience and collect their children at the end of the event. Contact is made by the ESO to the traveling Safeguarding team prior to match day, to obtain relevant safeguarding/welfare contact details. This informs any adjustments needed to facilitate a safe visit for the away team mascot.

## **SENSORY ROOM**

There are two Sensory rooms available at Selhurst Park on Match days which are managed by the Disability Liaison Officer. These are available for supporters and visitors to the stadium, with priority access reserved for those with additional needs and can be booked via supporter services.

## **7.5 IMAGES AND VIDEO OF CHILDREN**

Crystal Palace FC recognises that the ease of mobile technology can facilitate the capturing of images and video in a discrete and covert manner. Whilst the majority of images are taken for legitimate and

appropriate reasons, we must acknowledge that this is not the case for all. Therefore, Crystal Palace FC and the Foundation have a strict policy for taking images of children.

The Club and the Foundation will not capture any images or videos of children without prior explicit consent and any photographs taken will be done so by Club or Foundation approved personnel who have been subject to appropriate DBS checks. Any images taken or published will only feature appropriately clothed children. The taking of any images or video within dressing rooms, toilets and showers is strictly prohibited. Any breach of this must be reported to the Head of Safeguarding. Images and video will be stored in line with GDPR and the Club Privacy policy.

Parents/Carers are asked to refrain from sharing pictures online, especially those containing other young people, as this could inadvertently lead to a safeguarding risk. Any breaches of this guidance should be reported to the Safeguarding team.

The Club and the Foundation will use Social Media to share news, activities and to promote the work of the Club or Foundation. The use of children within these Social Media posts will only occur where explicit consent has been obtained.

## **7.6 RISK ASSESSMENT**

Prior to any event, activity or tour, the Club or Foundation will complete a risk assessment to determine the suitability of the event and identify any required mitigating actions to make the event safe and

equitable. These risk assessments will be reviewed and updated, including after incidents have arisen and shared with the Safeguarding team and the respective Boards where requested.

## **7.7 ACADEMY**

### **TOURS / OVERNIGHT ACCOMMODATION / AWAY MATCHES**

Individual risk assessments will be completed for any overnight tours and for all venues used by the Club. The Academy Tours Policy provides additional guidance to assist with identifying risk factors and managing tours safely.

### **TRAVEL**

The Academy have a Travel Consent policy in place which determines that players under 14 years must complete a travel consent form, signed by parent/carers as confirmation of independent travel to and from the training ground.

### **CHANGING FACILITIES**

Each age group and Match Officials have allocated changing facilities which they are required to use. Coaching staff are only permitted to access the facilities when appropriate to do so and additional guidance is provided to all Coaches.

### **TRANSITION TO SENIOR SQUAD**

Where players are called to train or play for the U21's or the First Team, we recognise this is open age football and therefore they will be playing alongside adults. Consideration is given to travel, changing room use and accommodation in each individual circumstance.

For any U18 players, consent will be sought for parent/carers.

## **7.8 RECRUITMENT TEAM (SCOUTS)**

All Scouts must be FA registered and have a current and satisfactory DBS in place. They are required to complete the FA Level 2 Talent Identification course and FA safeguarding children's training.

Scouts must wear Club branded clothing, carry Club ID with contact details for Selhurst Park contained, and must attend induction, training and regional meetings as required.

The Club have a specific Code of Conduct for the operation and use of Scouts.

## **7.9 HOST FAMILIES**

For players who require local accommodation, the Club will arrange and provide accommodation with a Host family to facilitate attendance at training and matches. The recruitment and vetting process is completed by the Safeguarding team and the ongoing relationship is managed and supported by the Player Care team.

Host families are rigorously checked via application forms, interviews and home assessments prior to any player being placed in their care. DBS checks are obtained on anyone residing in the home aged 16+. Risk assessments of the home environment including a health and safety assessment must take place prior to any placement of a player. Host families will receive both scheduled and unscheduled visits from the Club and are required to complete specific training covering Safeguarding, Equalities and Nutrition to fully support

the players in their care. Ongoing reviews will take place with regular feedback obtained from Academy players residing in host families.

Currently the Club do not place any player under 16 years in host family accommodation. Where there is a need to provide accommodation for a player under 16 years, private fostering regulations will be adhered to and consultation with the relevant Local Authority will take place. The Club do not intend to use host family accommodation for U16 players for longer than 28 consecutive days and whereby this may be a possibility, the Local Authority will be consulted and informed in advance.

Host families receive a daily expenses rate to cover the cost of the players care when in their home and are provided with ongoing training and support from the Player Care and Safeguarding teams.

## **7.10 PALACE FOR LIFE FOUNDATION**

The Palace for Life Foundation is fully integrated into the Club's safeguarding provision. The Foundation regularly engages with high risk participants on programmes and projects that are carefully assessed before projects commence, ensuring that the staff have the correct level of expertise and that there are adequate supervision ratios. The Foundation works in partnership with a number of agencies who specialise in education, mental health and law enforcement to complement and support the activities being delivered. Service Level Agreements between the Foundation and the partnering agency outline expectations in relation to safeguarding responsibilities and reporting concerns.



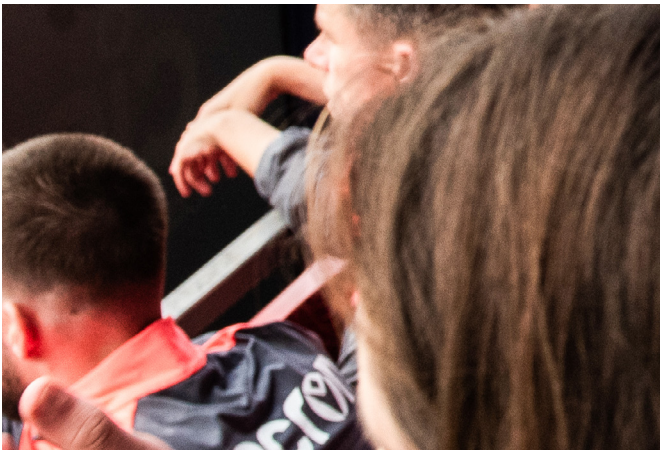
## PROGRAMMES

The Palace for Life Foundation run a variety of programmes for children. These include, but are not limited to, football development, education, training and employment, Premier League Kicks, Targeted Intervention, and Premier League Inspires..

Coaches are based in schools in the local area, delivering programmes such as Premier League Primary Stars and Team Mates.

Coaches work with children with disabilities and additional needs, both in schools and in the wider community.

Where the Foundation seeks to take children on residential trips, the risks of this are carefully considered in individual risk assessments, as part of the residential trips policy held by the Foundation.



## LATE COLLECTION OF CHILDREN

There are procedures in place if a child is not collected at the end of a programme session. The parents/carers will be contacted to make alternative arrangements if necessary. If they are unable to be contacted, the police will be informed.



### PHYSICAL ABUSE

Harm that is intentionally caused to a child. It 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.

### POSSIBLE PHYSICAL SIGNS

Bruises, burns, scalds, broken or fractured bones, scarring, bite marks, lacerations, drowning, suffocation, poisoning and effects of poisoning.

### POSSIBLE EMOTIONAL OR BEHAVIOURAL SIGNS

Anxiety, challenging behaviour, bullying behaviour, criminal behaviour, absconding from home, depression, alcohol or substance use, concerning sexual behaviour, suicidal thought or attempts.

### SEXUAL ABUSE

There are two types of sexual abuse; contact and non-contact and neither is less damaging. Sexual abuse can happen in person or online.

**Contact** sexual abuse involves sexual touching of any part of a child's body, whether they are clothed or not, using a body part or object to penetrate or rape a child, forcing a child to take part in sexual activities, forcing a child to undress or touch another person sexually.

**Non-contact** sexual abuse involves exposing or flashing, showing pornography, exposing a child to sexual acts, making them masturbate, forcing a child to make, view or share images or videos of child abuse including pictures of themselves, voyeurism i.e. 'upskirting', taking indecent images, forcing a child to take part in sexual activities or conversations online or via their phones.

### POSSIBLE PHYSICAL SIGNS

Bruises, bleeding, discharge, pain, discomfort or soreness around genital or anal region, pregnancy, miscarriage or abortion, sexually transmitted infections.

### POSSIBLE EMOTIONAL OR BEHAVIOURAL SIGNS

Change in behaviour either becoming withdrawn or extravert, sexualised behaviour or language inappropriate for age, bedwetting and nightmares, avoidance of certain people or environments, alcohol or substance use, self-harm, changes in eating habits, lack of hygiene or self-care, increased time online, increased secrecy, new or older peers, material goods or money.

### EMOTIONAL ABUSE

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may include threats, verbal abuse, humiliation, intimidation, prevention of using services, denial of access to friends, lack of stimulation and meaningful occupation, derogatory remarks, harassment, and deliberate exclusion. It may also be an overprotection or limiting of exploration and learning. Emotional abuse could also include witnessing others being subject to abuse. All types of abuse involve some level of emotional abuse, but this can also occur alone.

### THERE MAY NOT BE ANY PHYSICAL SIGNS OF EMOTIONAL ABUSE.

### POSSIBLE EMOTIONAL OR BEHAVIOURAL SIGNS

Lacking confidence, struggle to control emotions, extreme outbursts, isolated from parents or family, limited friends, isolated, lacking social skills, aggressive or cruel to other children or animals, lack of attachment to care givers.

### **NEGLECT**

The persistent failure to meet a child or dependents basic physical and/or psychological needs, which is likely to result in the serious impairment of their health or development. Neglect or acts of omission include failure to provide food, shelter or clothing, failure to provide medical care, hygiene or personal care, inappropriate use of medication, denial of educational, social and recreational needs, lack of stimulation or emotional warmth. There are four types of recognised neglect; physical, educational, emotional and medical.

### **POSSIBLE SIGNS**

Poor hygiene, appearing dirty or smelly, unwashed clothes, clothes not suitable for activity or season, being hungry, frequently unwell, lacking in meeting developmental milestones, lacking nutrients, anaemia, skin issues, tiredness, weight issues, dental problems, missed medical appointments, missed vaccinations, poor muscle or bone growth, unsuitable home environment, left alone for long periods, becoming the caregiver, change in behaviour; clingy, withdrawn, aggressive, isolated, displaying obsessive behaviours, difficulty concentrating, self-harm, missing school/college, use of alcohol or substances.

### **CHILD ON CHILD ABUSE**

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to)

- Bullying (including cyber, prejudice-based and discriminatory)
- Abuse in intimate personal relationships between peers
- Physical abuse
- Sexual violence and/or harassment
- Causing someone to engage in sexual activity without consent
- Consensual or non-consensual sharing of nude or semi-nude images
- Upskirting (taking an image under clothing without permission)
- Initiation and hazing type violence and rituals (KCSIE 2022)

Child on Child abuse can take place in both intimate and non-intimate relationships.

### **BULLYING**

This is behaviour which targets and hurts someone, either physically or emotionally. Bullying can be perpetrated by peers or adults, and in any environment. Everyone has the right to be protected from this behaviour and treated with dignity and respect.

### **POSSIBLE PHYSICAL SIGNS**

Physical injuries, problems with eating or sleeping, developing mental health problems, self-harm.

### **POSSIBLE EMOTIONAL OR BEHAVIOURAL SIGNS**

Losing or damaged belongings, feeling unwell before school, absence or absconding from school, not performing well at school/college, asking for or stealing money, losing confidence or becoming nervous or withdrawn, avoiding hobbies or activities, fewer friends, inappropriate behaviour for age, lack of self-esteem, substance misuse.

It is important to remember that children can be both perpetrators and victims in this abuse. The behaviour is harmful to children perpetrating the abuse as well as those who are victims of the abuse.



### ONLINE ABUSE

Any type of abuse that happens on the internet, across any device such as computers, tablets, phones, consoles. It can happen anywhere online including but not limited to text and messaging apps, social media, emails, online chat, apps, online gaming, live streaming sites. It can be perpetrated by strangers or people known to the child and could form part of offline abuse also.

### POSSIBLE EMOTIONAL OR BEHAVIOURAL SIGNS

More or less time spent online, gaming, texting or using social media, upset distressed or angry after being online, withdrawing or becoming increasingly isolated, being secretive about who they are talking to or what they are doing online, lots of new contacts, friends or followers.

### GROOMING

Is when someone builds a relationship, trust and emotional connection with a child or young person in order to abuse, manipulate and/or exploit them. Anyone can groom, it can take place in person or online and within days or over several weeks or months. Groomers often groom entire families to gain access to a child. Professionals can be groomed too if it facilitates access to a child. The relationship can take varying forms; romantic, mentoring, authority figure, dominant and persistent figure.

### POSSIBLE SIGNS

Increasingly secretive about who they are with/talking to, older boy/girlfriend, new or older peer group, money or material possession, alcohol or substance use, sexualised behaviour, upset, anxious, withdrawn, more or less time online/devices, going missing or spending time away from home, STI's, pregnancy, self-harm.

### CHILD SEXUAL EXPLOITATION [CSE]

Is a form of sexual abuse whereby the perpetrator identifies and exploits something the child needs or wants, in order to sexually abuse the child. Children are not always aware they are being abused. Some perpetrators use violence and intimidation to frighten or force a child and others groom and manipulate the child by framing it as a friendship / relationship.

Anybody can be a perpetrator of CSE, no matter their age, gender or race. CSE can happen in person or online.

### POSSIBLE PHYSICAL SIGNS

Any signs of physical abuse, bleeding or bruising of genitals or anal region, pregnancy, STI's,

### POSSIBLE EMOTIONAL OR BEHAVIOURAL SIGNS

Unhealthy or inappropriate sexual behaviour, Sudden mood and character changes, being frightened or wary of certain people or places, increased alcohol or substance use, increase in money or material possessions, new older peer group or relationship, being secretive, increase in time online, absconding or going missing, involvement in a gang or criminal activities.

**CHILD CRIMINAL EXPLOITATION [CCE]** Children are coerced or manipulated into committing crimes and/or gang involvement.

**COUNTY LINES** is a police term for the movement of drugs, usually from a city or large town to rural and seaside communities, using dedicated telephone 'deal' lines.

**CUCKOOING** is when the home of a vulnerable person is taken over by a criminal gang to enable their operation.

### POSSIBLE PHYSICAL SIGNS

Signs of physical abuse, signs of sexual abuse, self-harming,

### POSSIBLE EMOTIONAL OR BEHAVIOURAL SIGNS

Frequent absence or poor performance in school, going missing, staying out late, older peers or relationship, increase anger or violence, open affiliation with gang, increased isolation, increased emotional vulnerability, alcohol or substance use, increase in money and possessions, increase in arrest or criminal activities, known criminal associates, carrying weapons.



### **DOMESTIC ABUSE**

Is bullying, controlling, threatening, coercive or violent behaviour which takes place within a relationship. It can be well hidden and even if children are not present when there is violent or threatening behaviour exhibited, the risk of harm to them increases significantly. Domestic abuse can be perpetrated by men and women, parent to child and child to parent.

### **POSSIBLE PHYSICAL SIGNS**

Signs of physical, sexual, emotional abuse, self-harm behaviour, eating disorders,

### **POSSIBLE EMOTIONAL OR BEHAVIOURAL SIGNS**

Aggression or bullying, bed wetting, nightmares or insomnia, tiredness and difficulty concentrating, anxiety or depression, regular sickness, fear of one parent or household member.

### **RADICALISATION**

Refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Both adults and children can be radicalised and this can have implications both for children and/or adults at risk. Radicalisation may co-exist with other forms of child abuse and neglect. Radicalisation is similar to grooming in nature.

### **POSSIBLE SIGNS**

Showing sympathy for extremist causes, glorifying and advocating violence towards other faiths or cultures, possessing and/ or distributing illegal literature, out of character changes in behaviour, dress and peers, isolating selves from family/friends, disrespectful attitude towards people who are different to them, inability to discuss views or unable to explain opinions, change in ideology, secretive over internet use or movements.

### **EXTREMISM**

Is defined in the Oxford Dictionary as “The holding of extreme political or religious views; fanaticism” and an extremist is “a person who holds extreme religious (or political) views, especially one who advocates illegal, violent, or other extreme actions”.

### **MODERN SLAVERY AND TRAFFICKING**

This involves the purposeful movement of a child for economic benefit to a third party. Trafficking is when a child (and their family) is tricked, groomed or forced to leave their home, often with the promise of an improved quality of life, and is then moved and exploited. Children are trafficked for sexual exploitation, domestic servitude, benefit fraud, forced labour, forced marriage, involvement in crime such as drug distribution or farming. Trafficking is an economic crime and children can be trafficked from abroad or within the UK.

### **POSSIBLE PHYSICAL SIGNS**

Injuries from workplace related incidents, signs of physical or sexual abuse

### **POSSIBLE EMOTIONAL OR BEHAVIOURAL SIGNS**

Orphaned or living away from family, unable to speak local language, unsure of which town/city they are in, no family or parental contact, not registered with health or education services, unable to play or socialise with other children, spends lots of time doing chores, unexpected money or possessions, fearful, isolation.

### **HONOUR-BASED ABUSE**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the wider community. This can include female genital mutilation (see below), forced marriage, acid attacks, forced repatriation, male child preference and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

### **POSSIBLE SIGNS**

Withdrawal from education or activities, experiencing violence or threats of violence, coercion, physical, sexual or emotional abuse, intimidation, unreasonable restrictions of freedom, monitored by family or wider community, hiding mobile phones or social media, secret friends or relationships, limited aspirations, self-harm, requests for extended leave, failing to return from visits abroad.

### **FEMALE GENITAL MUTILATION (FGM)**

FGM is the deliberate alteration or removal of female genitalia for non-medical reasons. It is also known as female circumcision or cutting. It is illegal in the UK and is a highly dangerous practice. It is a practice used to control female sexuality and can cause long lasting physical and emotional damage. There are no medical reasons to carry out FGM and it is often performed by someone with no medical training, using inappropriate instruments such as scissors, glass, knives or razor blades and performed without the use of anaesthetic. Physical restraint is often applied. It can happen at various stages in a girl or woman's life such as when new born, childhood or adolescence, just before marriage and during pregnancy.

### **POSSIBLE SIGNS IT MAY HAPPEN**

Known 'cutter' visiting from abroad, special 'ceremony' planned, long overseas trip planned (during school holidays), female relative undergone FGM, long absence from school.

**If you suspect FGM has taken place or is going to take place you must report it.**

An abused child will often experience more than one type of abuse; this can be a single event or continuing over a period of time. There are also other prevalent issues that place children and young people at risk; Contextual safeguarding recognises that young people are vulnerable to abuse and harm beyond their families. For example, in school or college, the local community, their peer groups or online. Sometimes the different contexts are interrelated and can mean children and young people encounter multiple risks. Contextual safeguarding aims to support our understanding of how we can understand these risks, engage with children

and young people and help to keep them safe.

Adultification refers to the process by which children, especially children of colour, are perceived and treated as more mature or older than they actually are. This often involves assigning adult-like responsibilities, expectations, or stereotypes to children, typically resulting in negative consequences such as higher rates of punishment, racial profiling, or over-exposure to adult topics or expectations. In the context of safeguarding children, adultification can have harmful effects on their well-being, with children being viewed as a threat rather than requiring support.

## 7.12 RECOGNISING, RESPONDING TO AND RECORDING CONCERNS AND ALLEGATIONS

If there is a concern about the safety or welfare of a child, or a concern regarding someone's practice towards a child, this must be passed to the Head of Safeguarding. Some of the potential signs and indicators of abuse are mentioned above, but these are not definitive lists. In some cases, children may display some of the signs but are not being subject to abuse. It is not the role of anyone from the Club or Foundation to conclude that abuse is occurring.

It is rare to witness abuse taking place, and children may not directly disclose abuse, but any feeling of concern and worry should not be minimised, disregarded or ignored. Any action that causes harm or abuse towards a child is deemed unacceptable and should always be reported. Culture, race, religion, gender or age should not prevent reporting. All concerns, including those considered low level, must be passed to the Head of Safeguarding.

Children may have difficulty in sharing experiences of harm and abuse and this may be more prevalent for children with additional needs. If a child shares worries or experiences of abuse, it is imperative that this is taken seriously and responded to accordingly. In addition, if concerns or observations are raised via a third party, this must be reported to the Head of Safeguarding.



## HOW TO RESPOND WHEN RECEIVING A CONCERN OR ALLEGATION

When receiving a concern or allegation, it is vital that an accurate reflection is recounted, recorded and passed to the Head of Safeguarding. To enable this, the below steps should be followed:

Stay calm and try not to react strongly, such as being obviously shocked or angry

Listen carefully to what the child is saying

Explain early in the conversation that the information given may need to be passed to selected others

Do not promise to keep secrets

Avoid asking leading questions or asking why something happened. To establish clarification, you can use 'TED' style questioning, which is asking open questions such as 'Tell', 'Explain', 'Describe'

Do not discount the information being given, or attempt to justify or minimise

Don't make assumptions or fill 'gaps' in the story

Reassure the child they have done the right thing by disclosing and it is being taken seriously

Explain the next steps, what will happen next and who the information will be passed to

Record in writing what has been said on the MyVoice online report form, which can be accessed via the appropriate QR code for either Club, Foundation or Match Day reporting. Alternatively, for those with access, record on MyConcern. If these are unavailable, ensure there is a written record of the concern or allegation.

Use the specific words of the child raising the concern or allegation. Note any witnesses, any allegations, or names mentioned. Ensure all sections of the form are completed. The date and time the concern occurred must be accurately recorded.

Do not confront any alleged perpetrator or share information about the concern or allegation with them

Contact the Safeguarding team to pass on the concern or allegation immediately

Respect confidentiality and only discuss on a 'need to know' basis



Dealing with abuse can be one of the most difficult and distressing areas of working with young people. Do not underestimate the impact receiving a concern may have. Additional advice, supervision and support can be obtained from the Head of Safeguarding or HR.

### 7.13 REPORTING AND REFERRING CONCERNS, ALLEGATIONS AND POOR PRACTICE.

*If there is a serious or immediate risk of harm or emergency medical assistance is required, contact the emergency services on 999.*

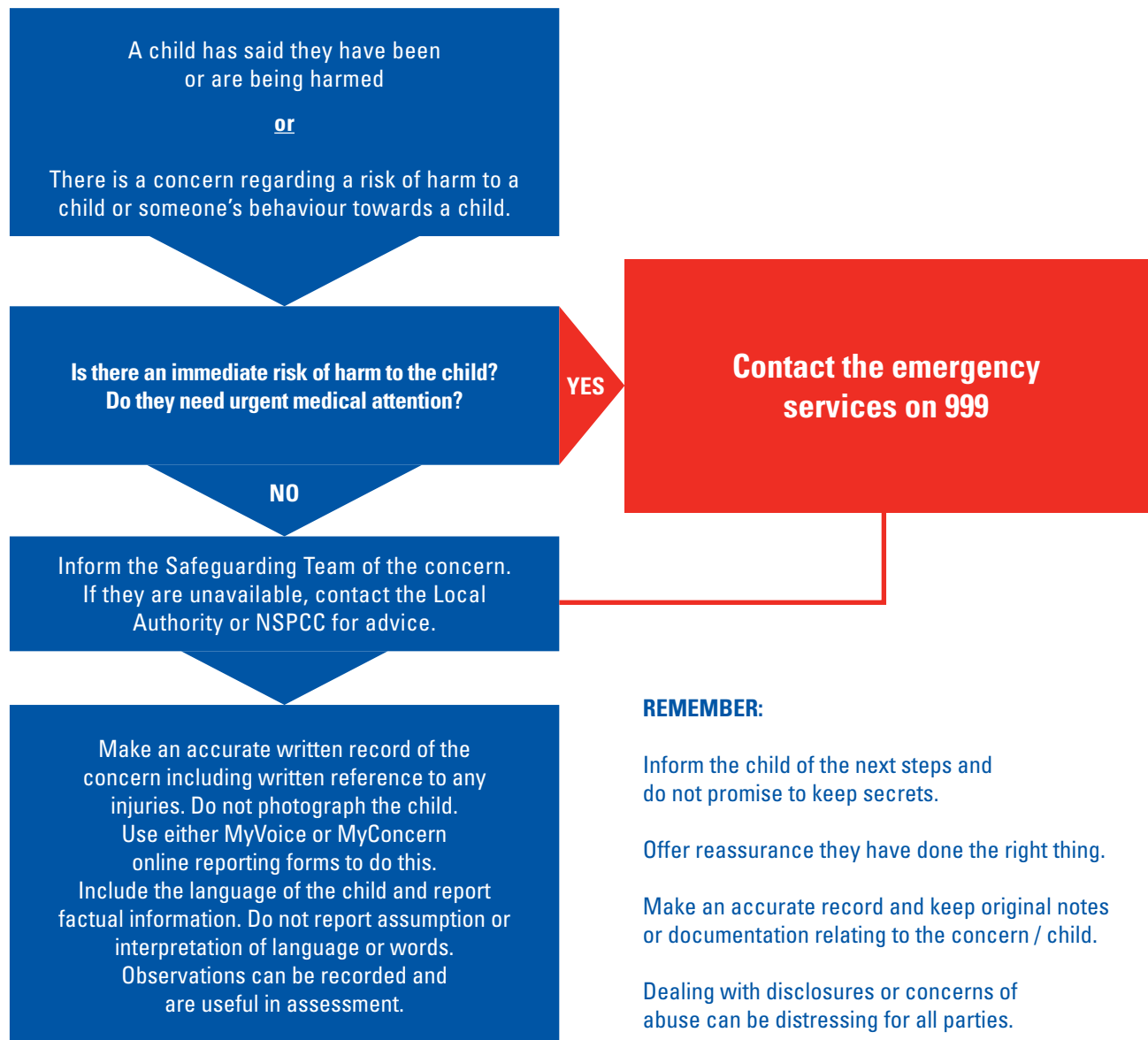
Any concerns about the safety or welfare of a young person under the age of 18, no matter how small, must be shared with the Head of Safeguarding or member of the Safeguarding team as soon as possible. Advice will be provided regarding the possible next steps and referrals to statutory authorities will be made where necessary. Anyone can contact the Local Authority Social Care or the Police for advice. Each Local Authority has a dedicated team, often known as the Multi Agency Safeguarding Hub (MASH) who deal with enquiries and provide advice in relation to child protection and safeguarding.

For young people under the age of 18 their parent or carer should be contacted for consent prior to contacting statutory agencies. This process should be followed unless contacting the parents/carers may increase the immediate risk to the young person (For example, suspected Fabricated or Induced illness, Sexual abuse, a report of harm and abuse perpetrated by someone in the home or family environment). The Safeguarding team will assess the risk of contacting

parents or carers to discuss concerns prior to a referral to statutory authorities.



# MANAGING CONCERNS ABOUT A CHILD



## KEY CONTACTS

### Laura Baptiste

Head of Safeguarding  
Laura.baptiste@cpfc.co.uk // 07341 887862

### Louise Green

Match Day, Events & Women's Academy DSO  
Louise.green@cpfc.co.uk // 07889422571

### Claire Elliott

Academy Safeguarding Officer  
Claire.elliott@cpfc.co.uk // 07586717879

### Thea Allum

Foundation Safeguarding Manager  
Theaallum@palaceforlife.org // 07522 225373

### Naomi Moore

Safeguarding and Player Welfare Officer (Women's Team)  
Naomi.moore@cpfc.co.uk // 07425311539

### Croydon Social Care

0208 255 2888  
Out of hours: 0208 726 6400  
childreferrals@croydon.gov.uk

### Safeguarding Team General Contact

Safeguarding@cpfc.co.uk

### Palace for Life Safeguarding General Contact

safeguarding@palaceforlife.org

## **7.14 ALLEGATION OF ABUSE BY CPFC / PALACE FOR LIFE EMPLOYEES OR VOLUNTEERS**

The term 'allegation' means it is suspected that a person who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

The London Child Protection Procedures makes it clear that an allegation can also relate to an adult's behaviour outside of work, and their relationships with others, if they:

- have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, relate to an arrest for an offence which would question their suitability for working with children;
- have, as a parent or carer, become subject to child protection procedures;
- are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to children for whom the adult is responsible in their employment/volunteering.

Any concern about an employee or volunteer's behaviour or conduct towards a child must be referred to the Head of Safeguarding as per the Club's

Managing Allegations policy. Any other intervention, such as raising the concern with the colleague directly or informing them of the report, could hinder any potential investigation and increase the risk of harm.

The Head of Safeguarding will inform the Chief People Officer and an appropriate course of action will be decided. In some cases, consultation with and referral to external agencies such as the Police, Local Authority, Disclosure and Barring Service, The FA and/or the Premier League will be necessary.

Where the concern relates to the Head of Safeguarding, a member of the safeguarding team, or Senior employees of the Club or Foundation, then the Designated Officer within the Local Authority (LADO) should be contacted.

## **POSITION OF TRUST**

It is accepted that any adult in a position which carries power, authority, status or responsibility over another is considered to be in a position of trust, even if the job role is not legally recognised as such. Football coaches are specifically covered by the position of trust legislation. However, Scouts, Club and Foundation employees would all be considered as being in positions of trust and influence.

## **7.15 LOW LEVEL CONCERNS AND POOR PRACTICE**

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above, or is not otherwise serious enough to consider a referral to the Designated Officer in the Local Authority (also referred to as LADO).



A low-level concern, no matter how small and even if no more than a 'nagging doubt', is a concern that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Poor practice does not necessarily imply intentional harm is taking place but it can be a determining factor in escalating risk-taking behaviours which may cause harm.

Any of the following can be considered poor practice. This list is not exhaustive.

- Lack of professional boundaries
- Contact during unsociable hours (e.g. late at night)
- Connected on personal social media accounts
- Sharing personal details such as home address
- Taking or inviting children to home address
- Insufficient care to avoid accident or injuries
- Unnecessary risk taking
- Not complying with policies and procedures
- Unnecessary lone working with children unless explicitly consented to in advance i.e. giving lifts, going into changing rooms or toilets
- Engaging in physical or sexually provocative games or banter
- Facilitating inappropriate conversations or 'flirting'
- Over-familiarisation

- Encouraging, allowing or engaging in inappropriate touch
- Failure to adequately risk assess activity

It is not the role of employees to determine in each case whether their concern is a low-level concern, meets the threshold of an allegation or if it is serious enough to consider a referral to the Designated Officer in the Local Authority. That determination will be made by the Head of Safeguarding, in consultation with the Chief People Officer. The Club and Foundation are bound by The FA regulations to report low-level concerns and incidents of poor practice to The FA for consideration

## 7.16 CONFIDENTIALITY

Where a safeguarding concern about a child or young person is identified, the Club may refer these to statutory authorities. All efforts will be taken to maintain appropriate confidentiality and information will only be shared on a need to know basis.





## 08 SAFEGUARDING ADULTS

All adults who engage with activities provided by Crystal Palace FC or the Palace for Life Foundation have the right to be protected from harm, abuse and exploitation. It is the duty and responsibility of all employees, volunteers, players and others engaged with the Club and Foundation to safeguard adults at risk and demonstrate best practice.

### 8.1 DEFINITIONS

**Adult at risk:** An Adult at Risk is defined in the Care Act (2014) as someone who is 18 years or older and who:

- Has care and support needs (which are or are not being met by the local authority)
- Is experiencing, or is at risk of, abuse and neglect and
- As a result of their needs, may or may not be unable to protect themselves against abuse or neglect.

**Vulnerable adult:** The Care Act replaces the term 'Vulnerable Adult' with 'Adult at risk'.

**Safeguarding:** The action taken to promote welfare and protect people from harm. Safeguarding adults refers to protecting their right to live safely and free from abuse, while considering the views, wants and wishes of the adult.

**Abuse:** Abuse occurs when an adult at risk of harm is mistreated, neglected or harmed by another person(s). Everyone has a right to feel safe and to live without fear of abuse, neglect or exploitation. Adults may be deemed 'at risk of abuse' or considered as vulnerable

if they are experiencing any of the following:

- Learning or physical disabilities
- Brain injuries
- Mental ill or physical ill health
- Substance or alcohol misuse

It is important to recognise that whilst some circumstances mean some adults are more at risk than others, any adult can become an adult at risk or can experience abuse at any time in their lives. Therefore, an 'adult at risk' could also be an employee, volunteer or another adult involved with representing the Club or the Foundation. Vigilance to increased risk or a need for protection and support should be in place at all times.

**Disclosure:** The act of informing someone that abuse is occurring or has occurred. However, this presumes there is an awareness or recognition of abuse. The term 'disclosure' also implies a one-off event and excludes children and adults with communication needs and those who are non-verbal or have a language barrier. Where possible, the term 'Disclosure' is avoided in this policy and 'Allegation' or 'Concern' used in its place.

**Allegation:** A statement that someone has done something wrong, without providing proof.

**Safeguarding Concern:** Information provided or something seen or heard which indicates that someone's safety or wellbeing is at risk.

**Non-recent abuse:** Is where an adult experienced abuse as a child. This is sometimes referred to as 'historical abuse'. It is widely recognised that people do not disclose or recognise abuse until many years later.

## 8.2 LEGISLATION AND GUIDANCE

All Crystal Palace Football Club and Palace for Life Foundation employees and volunteers are required to adhere to policies and procedures relating adult safeguarding practice. Our policy and aim are to safeguard and promote the welfare of adults at risk in accordance with legislation including but not limited to:

- Equality Act 2010
- Human Rights Act 1998
- Care Act 2014
- Mental Capacity Act 2004
- Rehabilitation of Offenders Act 1974
- Care Act statutory guidance 2017
- London Multi Agency Adult Safeguarding Policy and Procedures (2019)
- Data Protection Act 1998
- Sexual Offences Act 2003
- Domestic Abuse Act 2021

## 8.3 PRINCIPLES OF SAFEGUARDING ADULTS [THE CARE ACT 2014]

The Care Act places an emphasis on working with adults at risk of abuse and neglect to have greater control in their lives to prevent harm from happening, and to provide informed options about how to deal it. The Care Act is clear that an adult at risk has the right to make choices about how they live their lives, this includes taking risks that may not be beneficial or you may not agree with. However, this does not mean that concerns should not be discussed with the individual and raised with the Head of Safeguarding.

The Care Act identifies six principles that underpin practice for safeguarding adults:

- **Empowerment** – People supported to make own decisions and give informed consent.
- **Prevention** – Taking action before harm occurs.
- **Proportionality** – Responding appropriately to the risk presented.
- **Protection** – Support and representation for those in greatest need.
- **Partnership** – Local solutions and community engagement.
- **Accountability** – transparency and accountability in safeguarding practice.

## 8.4 MENTAL CAPACITY ACT 2004

This Act is designed to protect and empower people who may lack the mental capacity to make decisions about their care and medical treatment.

The Act outlines five principles which should be considered when safeguarding the needs of adults:

- A person must be assumed to have capacity unless it is medically established that they lack capacity
- A person is not to be treated as unable to make a decision unless all practicable steps to help them to do so have been taken without success.
- A person is not to be treated as unable to make a decision merely because they makes an unwise decision.
- An act done, or decision made, under this Act for or on behalf of a person who lacks capacity must be done, or made, in their best interests.
- Before the act is done, or the decision is made, consideration must be given to whether the purpose for which it is needed can be

as effectively achieved in a way that is less restrictive of the person's rights and freedom of action.

All participants engaged in programmes with the Foundation will be deemed to have capacity unless the Club or the Foundation are explicitly informed otherwise.

It is important to recognise that people have the right to make decisions which may put themselves at risk or may not be agreeable with others. Unless there has been a clear assessment to determine capacity, everyone should be treated as though they have capacity to make their own decisions.

## **8.5 PREVENT STRATEGY**

The UK faces a range of terrorist threats and at all times is assessing the national threat level to determine the likelihood of a terrorist attack. There are five threat levels; low, moderate, substantial, severe, critical, and the level is set and reviewed by the Joint Terrorism Analysis Centre and the Security Service (MI5).

PREVENT forms part of the Government's counter terrorism strategy (CONTEST) and its aim is to stop people from becoming drawn into or supporting terrorism. This includes countering terrorist ideology and challenging those who promote it; supporting individuals who are especially vulnerable to becoming radicalised; and working with sectors and institutions where the risk of radicalisation is assessed to be high.

The Club and Foundation require all employees to complete mandatory PREVENT training so they can

be aware of the risks and potential indicators of radicalisation, and consequently are able to escalate concerns. All players are provided with anti-extremism and anti-radicalisation awareness workshops as part of the life skills programmes. The Club and Foundation work closely with the local Counter Terrorism Police, the local Prevent Coordinator and Community Engagement team to share concerns, receive guidance and updates in relation to the national and local threats.

As part of the risk management process, the Club and Foundation will consider where and how individuals might be at risk of being drawn into terrorism. The level of risk will vary between activities, geographical location, and profile of participants. Information and intelligence from external sources, such as the regional Prevent Coordinator, Local Authorities, and the Police, will be considered as part of the risk assessment and associated mitigation plans.

## **8.6 WELLBEING AND WELFARE – SUPPORTING ADULTS WHO ARE NOT DEEMED 'AT RISK'**

There are many adults who are at an increased risk of abuse, but who do not meet the criteria to be deemed an 'adult at risk' as they do not have additional care or support needs. Wherever someone is being abused, or where there is a risk of harm, there are agencies that can provide support and advice which does not necessarily include a referral to statutory authorities.

Promotion of individuals' wellbeing is a key factor in all Club and Foundation activities and the Club can signpost to a variety of organisations to support wellbeing. The Premier League prioritise the mental

wellbeing of players and have rules which determine the Club's responsibility to provide information and support to players of all ages, including after retirement from the game.

## 8.7 PALACE FOR LIFE FOUNDATION

Palace for Life Foundation offer a number of programmes specifically designed to support adults and promote health and wellbeing. An example of these are Powerchair Football, Down's Syndrome Football, Walking Football, Extra Time club and Pan Disability Football. These sessions aim to be fun, provide an opportunity to make friends and reduce isolation as well as improve coordination and football skills.

## 8.8 RISK ASSESSMENTS

Prior to any event, activity or tour, the Club or Foundation will complete a risk assessment to determine the suitability of the event and identify any required mitigating actions to make the event safe and equitable.

These risk assessments will be reviewed and updated, including after incidents have arisen and shared with the Safeguarding team and the respective Boards where requested.

## 8.9 SIGNS AND INDICATORS OF ABUSE

As identified by the Care Act 2014, there are ten recognised categories of abuse in relation to adults at risk:





**PSYCHOLOGICAL ABUSE:** Includes emotional abuse, threats of harm or abandonment, humiliation, deprivation of contact, blaming, bullying and controlling. It can be verbal or non-verbal and the aim is to reduce the confidence and independence of victims with the intention of making them compliant.

**PHYSICAL ABUSE:** Can include hitting, pushing, slapping, restraint or physical sanctions, misuse of medication, poisoning, scalding or any form of physical harm.

**SEXUAL ABUSE** this includes sexual activity which occurs without consent or sexual activity with someone who is unable to give their consent.

**SEXUAL EXPLOITATION** also forms part of sexual abuse and in some cases the person may not recognise they are being exploited or abused.

**NEGLECT AND ACTS OF OMISSION:** Failure to provide access to health, care or support services, ignoring physical or physical care needs, withholding medication, adequate nutrition or heating.

Neglect is also a failure to intervene in cases where people lack capacity or are unable to adequately assess risk.

**FINANCIAL ABUSE:** When money and/or valuables have been stolen or where someone uses coercion or deception to gain access to money and possessions and uses them in ways that the person does not wish.

**MODERN SLAVERY:** Slavery, servitude and forced or compulsory labour. This affects people of all ages. This can involve the purposeful movement of an adult for economic benefit (trafficking), often involving forced or unpaid labour, sexual exploitation, rape or prostitution. In some cases, the adult(s) may fail to recognise this as abuse.

**SELF – NEGLECT:** When an individual fails (or is unable) to attend to their basic needs, such as personal hygiene, appropriate clothing, feeding, or tending appropriately to any medical conditions they have. This could also include physical self-harming behaviour and hoarding and could be a result of a lack of capacity.

**ORGANISATIONAL ABUSE:** When a place, company, organisation or charity undertakes practices which cause harm and abuse. It is also where organisations fail to address practices known to cause harm and when known abuse is ignored to protect adults and/ or limit reputational damage

**DISCRIMINATORY ABUSE:** Involves unfair treatment because of an identifiable factor, such as race, gender, age, disability, sexual orientation, identity or religion. It can include harassment, verbal abuse and unfairly preventing access or opportunities. Physical abuse and other forms of abuse can arise because of discrimination.

**DOMESTIC ABUSE:** This is abuse inflicted by a partner or family member. It can be a single incident or a recurring pattern, which involves controlling, coercive or threatening actions.

**Forced Marriage** and so-called ‘**Honour-Based**’ abuse are also forms of domestic abuse.

It is acknowledged that domestic abuse can happen from child to parent and sibling to sibling along with partner-to-partner.

## ADDITIONAL ISSUES TO CONSIDER

**Coercive control** is a form of domestic abuse. It is a pattern of controlling behaviours within a relationship to disempower one partner causing them isolation, exploitation, and loss of independence. Coercive control is a criminal offence.

**Honour based abuse** is a collection of practices used to control behaviour within families in order to protect perceived cultural and religious beliefs and/or honour. Violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

**Hate crime** is where people perceive they are targeted and abused or mistreated due to their gender identity, religion, sexuality or disability.

**Mate Crime** is where vulnerable people are befriended by others for the purpose of exploitation.

**Radicalisation** is comparable to other forms of exploitation and involves grooming people to recruit and align with a cause or ideology. 'Prevent' forms part of the UK Government counter-terrorism strategy Contest and the revised Prevent Duty guidance (2023) identifies radicalisation as the 'process by which people come to support terrorism and extremist ideologies associated with terrorist activities'.

There are a number of factors that can increase vulnerability to radicalisation and where there is concern it is important to raise this with the Head of Safeguarding. If there are concerns about potentially imminent extremist activity taking place, the Police

should be notified immediately.

### Position of Trust

It is accepted that any adult in a position which carries power, authority, status or responsibility over another is considered to be in a position of trust, even if the job role is not legally recognised as such. Football coaches, Scouts, Club and Foundation employees would all be considered as being in positions of trust and influence.

## 8.10 POOR PRACTICE

Poor practice can be identified as any behaviour which does not comply with the Club or Foundation Code of Conduct, infringes an individual's rights or reflects to fulfil the highest standards of care. Poor practice does not necessarily imply intentional harm is taking place but poor practice can be a determining factor in escalating risk-taking behaviours.

Any of the following can be considered poor practice. This list is not exhaustive.

- Lack of professional boundaries
- Contact outside of expected hours (i.e. evenings and weekends unless relevant to activities)
- Connected on personal social media accounts
- Sharing personal details such as home address, phone numbers
- Taking or inviting participants to home address
- Insufficient care to avoid accident or injuries
- Unnecessary risk taking
- Not complying with policies and procedures
- Unnecessary lone working
- Engaging in physical or sexually provocative

games or banter

- Facilitating inappropriate conversations or 'flirting'
- Over-familiarisation
- Encouraging, allowing or engaging in inappropriate touch

It is not the role of employees to determine in each case whether their concern is a low-level concern, or if it meets the threshold of an allegation. Any concerns must be passed to the Head of Safeguarding.

## 8.11 CONSENT AND REPORTING CONCERNS AND ALLEGATIONS

The Six Principles of Safeguarding Adults (8.3) should be applied at all times and adults should be supported to make informed decisions which will preserve their safety. However, there needs to be a balance between risk and an individual's right to make their own informed decisions, even if others consider the decision to be unwise or puts the individual at risk.

The importance of the right for people to make decisions about their own life needs to be considered as well as the safeguarding concerns. Therefore, unless there is a significant risk of harm to others, consent must be obtained from the adult at risk before contacting statutory or external agencies.

There are a number of reasons that an adult may choose to withhold consent for example; lack of trust in services or professionals, fear of repercussions or experiencing coercion and control. Reassurance and clear information about options and support available will help adults to make an informed decision about

whether they consent to share the information.

If the adult refuses intervention to support them with a safeguarding concern, or does not provide consent for information about them to be shared with other safeguarding partners, generally their wishes should be respected.

However, in some circumstances, there can be considered justifiable reasons to overrule the decision such as:

- Emergency or life-threatening situations may warrant the sharing of relevant information with the emergency services without consent
- Other people are, or may be, at risk, including children
- Sharing the information could prevent a serious crime
- A serious crime has been committed
- The risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference referral
- The adult lacks the mental capacity to make a decision; this must be properly explored, determined and recorded in line with the Mental Capacity Act
- Club or Foundation employees are implicated

Except for emergency situations, no decision to overrule a withholding of consent should occur without referral to and consultation with the Head of Safeguarding. It is important to record decisions and make records as any decision to overrule consent could, without appropriate and justifiable cause,



result in legal action. Where the decision is taken to overrule, this and the reasons should be shared with the adult, unless it increases the risk of harm.

Where there is a risk of harm to others, including children, then the information should be passed to the Local Authority or Police and can be done so without

the consent of the adult. However, information about the adult should not be shared with any other family member without consent from the adult.

Any concerns or allegations should be reported to the Head of Safeguarding or Safeguarding team.





## RESPONDING TO A CONCERN OR ALLEGATION

When receiving a concern or allegation, it is vital that an accurate reflection is recounted, recorded and passed to the Head of Safeguarding. To enable this, the below steps should be followed:

Stay calm and try not to react strongly.

Listen carefully to what is being said.

Reassure them that they have done the right thing and it is being taken seriously; this could be the first time they have told anyone about the abuse.

Use 'TED' style open questioning to clarify information; 'Tell' 'Explain' 'Describe'.

Avoid asking why something happened as this implies blame.

Ask the adult what they would like to happen next – this could involve supporting them to tell others including family members or professionals.

If the adult does not wish to take any further action, this choice has to be respected unless there is a concern that someone else may be at risk.

Inform them that you will pass this information to the Head of Safeguarding and that their wishes for next steps will be respected.

Where consent is obtained for a referral, this should be actioned immediately.

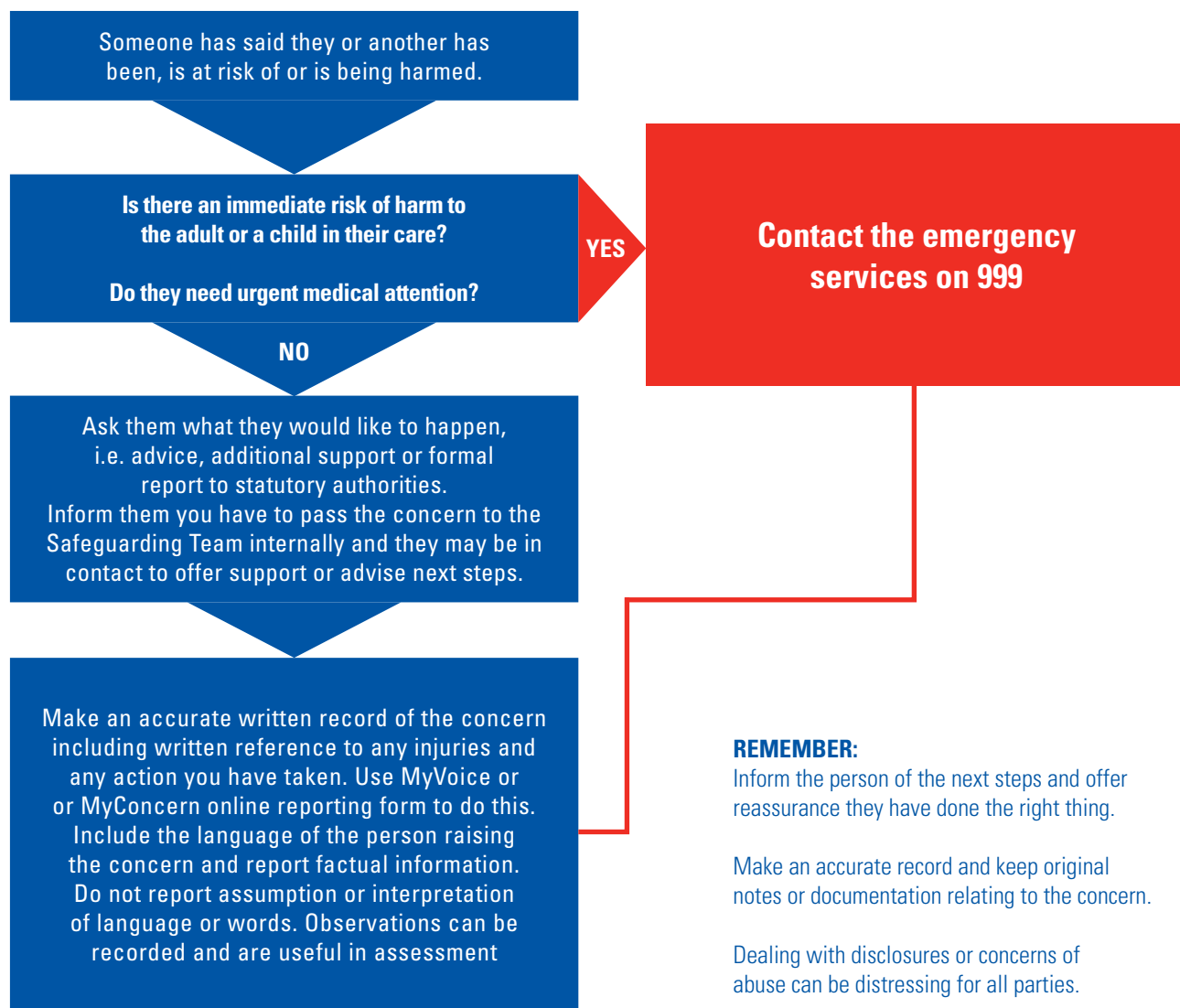
Ensure there is a written record of the concern or allegation. Use MyVoice or Myconcern online report forms where possible and share this with the Head of Safeguarding. Use the specific words of the adult raising the concern or allegation, complete all sections of the form noting the date, time, witnesses, and any allegations or names mentioned.

Report to the Safeguarding team.

Respect confidentiality and only discuss on a 'need to know' basis

Take some time; acknowledge that receiving a concern or allegation can evoke unexpected emotions.

# MANAGING CONCERNS ABOUT AN ADULT AT RISK



## KEY CONTACTS

### Laura Baptiste

Head of Safeguarding

Laura.baptiste@cpfc.co.uk // 07341 887862

### Louise Green

Match Day, Events & Women's Academy DSO

Louise.green@cpfc.co.uk // 07889422571

### Claire Elliott

Academy Safeguarding Officer

Claire.elliott@cpfc.co.uk // 07586717879

### Thea Allum

Foundation Safeguarding Manager

Theaallum@palaceforlife.org // 07522 225373

### Naomi Moore

Safeguarding and Player Welfare Officer (Women's Team)

Naomi.moore@cpfc.co.uk // 07425311539

### Croydon Social Care

0208 255 2888

Out of hours: 0208 726 6400

childreferrals@croydon.gov.uk

### Safeguarding Team General Contact

Safeguarding@cpfc.co.uk

### Palace for Life Safeguarding General Contact

safeguarding@palaceforlife.org

## 8.12 ALLEGATIONS OF ABUSE BY CPFC / PALACE FOR LIFE EMPLOYEES OR VOLUNTEERS

The term 'allegation' means that it is suspected that a person who works with children or adults:

- behaved in a way that has harmed a child or adult, or may have harmed a child or adult;
- possibly committed a criminal offence against or related to a child or adult; or
- behaved in a way that indicates they may pose a risk of harm to children or adults.

In addition, an allegation can also relate to an adult's behaviour outside of work, and their relationships with others, if they:

- have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child or adult at risk but could, for example, include an arrest for the possession of a weapon;
- have, as a parent or carer, become subject to child protection procedures;
- are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to children for whom the adult is responsible in their employment/volunteering.

Any concern about an employee or volunteer's behaviour or conduct towards an adult at risk must be referred to the Head of Safeguarding. Any other intervention, such as raising the concern with the colleague directly or informing them of the report,

could hinder any potential investigation and increase the risk of harm.

The Head of Safeguarding will inform the Chief people Officer and an appropriate course of action will be decided. This may include a referral to the Police, Local Authority, LADO, DBS, Premier League or the FA.

## 8.13 NON-RECENT ALLEGATIONS

A non-recent allegation refers to a report of abuse from an adult who experienced the abuse as a child, or from a child who experienced the abuse over a year ago. Reports of non-recent abuse can also come from third parties who were aware of the abuse at the time.

In recent years there have been growing reports of abuse occurring within organisations and allegations made against prominent people who held positions of trust. Football is no exception and as more allegations are taken seriously and prosecutions obtained, confidence to disclose experiences of abuse is rising.

Any report of non-recent abuse should be responded to in the same manner as report of recent abuse and should be reported to the Head of Safeguarding. The decision of the adult and their consent to share information will be respected but in cases where there remains a risk of harm, such as the alleged perpetrator still working with children or adults at risk, then a lack of consent to share would be overruled. Where implicated, the Club will comply with any external investigation in relation to an allegation of non-recent abuse.



## 8.14 CONFIDENTIALITY

Where there are concerns for the safety of individuals, confidentiality cannot be assured. In any case of reported harm or concern, information will be shared with consent, where necessary, and only disclosed on a need to know basis. 'Confidentiality' should not prevent a referral to the Head of Safeguarding.





## 09 APPENDIX

### 9.1 KEY CONTACTS

NAME	ROLE	CONTACT
<b>Julie Brown</b>	CPO - Board Safeguarding Lead	Julie.Brown@cpfc.co.uk
<b>Mike Summers</b>	Foundation CEO – Board Safeguarding Lead	Mikesummers@palaceforlife.org
<b>Laura Baptiste</b>	Head of Safeguarding	Laura.baptiste@cpfc.co.uk 07341 887682
<b>Louise Green</b>	Match Day, Events & Women's Academy DSO	Louise.green@cpfc.co.uk 07889422571
<b>Claire Elliott</b>	Academy Safeguarding Officer	Claire.Elliott@cpfc.co.uk 07586717879
<b>Thea Allum</b>	Foundation Safeguarding Manager	Theaallum@palaceforlife.org 07522 225373
<b>Naomi Moore</b>	Safeguarding and Player Welfare Officer (Women's Team)	Naomi.Moore@cpfc.co.uk 07425311539
<b>Amanda Cheeseman Kevin Day</b>	Palace for Life Foundation Safeguarding Trustees	safeguarding@palaceforlife.org
<b>Anti-Social Behaviour Text Alert (Match days)</b>		07507 477669

## 9.2 EXTERNAL SAFEGUARDING CONTACTS

FOOTBALL	
Safeguarding team at Premier League	safeguarding@premierleague.com
Safeguarding team at The FA	safeguarding@thefa.com 0800 169 1863
Surrey County FA	safeguarding@surreyFA.com
STATUTORY AGENCIES	
Police	101 or 999 in emergency
Croydon Multiagency Single Point of Contact (SPOC)	0208 2552888 (Monday to Friday 9am-5pm) childreferrals@croydon.gov.uk Emergency out of hours social work service: 0208 7266400
Croydon Safeguarding Children Board	0208 604 7275
Croydon Adult Health and Social Care	020 8726 6500 <a href="https://new.croydon.gov.uk/adult-health-and-social-care/report-abuse-adult/safeguarding-adults-form">https://new.croydon.gov.uk/adult-health-and-social-care/report-abuse-adult/safeguarding-adults-form</a>
Croydon Local Authority Designated Officer (LADO) (for concerns about professionals working with young or vulnerable people)	lado@croydon.gov.uk 020 8255 2889
Prevent or Channel referral to Croydon Prevent Officer	020 8726 6000 Channel@croydon.gov.uk
National anti-terrorist report line	0800 789 321
INDEPENDENT	
NSPCC 24-hour helpline	0808 800 5000 help@nspcc.org.uk
Child Protection in Sport Unit	0116 234 7278 cpsu@nspcc.org.uk
CEOP (Child Exploitation and Online Protection)	<a href="https://www.ceop.police.uk/ceop-reporting/">https://www.ceop.police.uk/ceop-reporting/</a>
Young Minds Parents helpline	0808 802 5544
Childline	0800 1111
National Domestic Abuse helpline (Refuge) Women and Children	0808 200 0247
Respect Men's advice line	0808 801 0327
Bright Sky app (free from Apple app store or Google Play)	Bright Sky is a free to download mobile app providing support and information to anyone who may be in an abusive relationship or those concerned about someone they know. Available in English, Urdu, Punjabi and Polish



# KEEPING PALACE **SAFE!**

## REPORT A SAFEGUARDING CONCERN

At Crystal Palace, our safeguarding mission is to provide a safe, positive and enjoyable environment for everyone involved with the Club.

We have a dedicated safeguarding team to provide advice and support, ensuring there are robust measures in place across all aspects of our Club and the Palace for Life Foundation.

But safeguarding is a role for everyone – we all have a duty to keep children, young people and adults safe.

Scan this QR code to quickly, safely and easily report worries, concerns or abuse. You can even do so anonymously.

If someone is at risk of immediate harm you should always alert a member of Crystal Palace staff, ask for the Safeguarding Officer and emergency services immediately.

**WATCH, LISTEN, TALK and ACT**  
if you have any safeguarding concerns.



**SAFELY, QUICKLY AND EASILY REPORT  
YOUR WORRIES, CONCERNS OR ABUSE**



# PALACEFORALL



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# PALACE**FOR**ALL





**FEBRUARY 2025**  
**REVIEW: FEBRUARY 2026**