



Child and Vulnerable Adult and Coach Protection Policy

Contents

Definition of Terms..... 2

Introduction, Objectives and Methods 3

Types of Abuse..... 4

Recognising Abuse..... 6

Racism and Bullying 8

Minimising Abuse..... 10

Flowchart - how to deal with the Suspicion of Abuse 11

Responding to Disclosure of Abuse by a Child..... 12

Extra Information. 13

Flowchart - Following up concerns about Staff..... 14

Managing Allegations against Staff 15

Medical Help 18

The Law and Medical Consent - Children 19

Coach Recruitment..... 20

Policy on the Recruitment of Ex Offenders 21

Policy on the Secure Handling of Disclosure Information..... 22

Use of Photographic and Video Equipment..... 23

Acknowledgement and thanks go to Aberdeen Football Club for allowing us to draw heavily on their policy document in preparing this policy document

Definition of Terms

WORD/PHRASE	DEFINITION
Child	Refers to any person aged under 18. In the context of this Child and Coach Protection Policy it can also be deemed to refer to any vulnerable adult who would be significantly at risk of abuse within the football club.
Abuse	1 : a corrupt practice or custom 2 : improper or excessive use or treatment 3 : obsolete : a deceitful act : 4 : language that condemns or vilifies usually unjustly, intemperately, and angrily 5 : physical maltreatment 6 ; refer to page 6 for full definitions and examples in sport
Child Protection Officer	A designated person will normally act as the Child Protection Officer for Cowdenbeath Football Club. In the absence of a recognised Child Protection Officer the Chairperson of the Football Club will assume this role.
Members of Staff	In this policy all references to "Members of Staff" of Cowdenbeath Football Club should include all members of staff of the football club, whether paid or unpaid and whether acting as volunteer helpers or under contract with the club.

Introduction

COWDENBEATH FOOTBALL CLUB POLICY STATEMENT ON SAFEGUARDING THE WELFARE OF CHILDREN AND COACHES

Every child who plays or participates in football under the Cowdenbeath Football Club umbrella, should be able to take part in an enjoyable and safe environment and be protected from abuse and the fear of abuse. This is the responsibility of every adult involved in the physical and mental development of young Cowdenbeath Football Club players.

Cowdenbeath Football Club recognises its responsibility to safeguard the welfare of all young players from the dangers of all forms of physical, sexual and emotional abuse and that they do not suffer neglect or are exposed to bullying.

To achieve this aim, Cowdenbeath Football Club commits to educating its coaches and all staff engaged in and involved with the development of young players, in preventing abuse and taking the appropriate action if there is the suspicion of abuse or a belief that a child is at risk of abuse.

Objectives and Method

It is vitally important that all young people participating in football with Cowdenbeath Football Club do so in a quality, safe and enjoyable environment. To achieve this aim, the Club has compiled a *Child and Coach Protection Policy* which details how to take appropriate action if they suspect or believe a child is at risk of abuse. It also provides procedures and guidelines to minimise risk for abuse to develop and provide appropriate safeguards for all concerned in the Club.

- The Club will plan and organise its work with children so as to minimise the situations where abuse of young players may occur.
- The Club will introduce a system whereby young players, parents, guardians, carers and coaches may talk with an independent person if so requested.
- The Club will set in place a rigorous recruitment procedure to ensure all reasonable steps have been taken to safeguard children.
- The Club will issue guidelines on how to deal with the disclosure of suspicion of abuse.
- The Club will actively encourage its coaches to attend SFA Coach Development Courses.
- The Club will issue guidelines based on this policy to all coaches and other relevant staff, as well as having in-house training. The Club will also highlight relevant literature to review, in order that coaches and others fully understand the Child and Coach Protection issues.
- The Club will also encourage staff to discuss concerns or queries informally with the Child Protection Officer where they are in doubt as to how to proceed.
- Where appropriate parents will be advised of the existence of these Guidelines and a summary made available.

This policy is in force to protect all young players from potential abuse and also to protect our coaches from the possibility of false accusations.

Contact Information

The following points of contact have been established concerning Child and Coach Protection:

Childline Scotland	0800 44 1111
Children First	0808 800 2222
Social Work Department	01383 313 233
Child Protection Unit	01383 312910
Fife Police	01383 318 700

Types of Abuse

It is generally accepted that there are four main forms of abuse. However, specific issues of racism and bullying can also arise and they have severe and adverse effects on people, especially children. Cowdenbeath Football Club and The Scottish Football Association are committed to protecting children from all forms of abuse.

Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to the child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person.

It may feature expectations being imposed on children which are inappropriate due to the child's age or development. It may also involve causing children to frequently feel frightened or in danger, or the corruption and exploitation of a child.

Some level of emotional abuse is persistent in all types of child abuse although it may exist on its own.

Emotional Abuse in Sport

This may include the persistent failure to show self-respect, build self-esteem and confidence, and support children that may be caused by:

- Exposing children to a humiliating, taunting or aggressive behaviour or tone.
- Failure to intervene where a child's self confidence and worth are challenged or undermined.
- Imposing unrealistic goals or expectations on a child thereby creating feelings of inadequacy.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent failing to provide adequate food, shelter, warmth, clothing, and cleanliness. It may also include leaving a child home alone, exposing the child in a manner likely to cause them unnecessary suffering or injury and the failure to ensure that a child's receives appropriate medical care or treatment.

Neglect in Sport

This could include lack of care, guidance, supervision, or protection such as:

- Exposing the child to unnecessary cold or heat.
- Exposing the child to unhygienic conditions, lack of food, water or medical care.
- Not intervening to prevent bullying or taunting.

Neglect, as well as being the result of a deliberate act, can also be caused through omission or the failure to act or to protect.

Physical Abuse

Physical abuse may involve the actual or attempted physical injury to a child including hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise harming a child.

Physical abuse may also be caused when a parent feigns the symptoms of or deliberately causes ill health to a child they are looking after. This situation is known as Fictitious or Induced Illness

Syndrome. A person may do this because the need or enjoy the attention they receive through having a sick child.

Physical abuse may be a deliberate act, an omission, or the failure to protect.

Physical Abuse in Sport

This may include the bodily harm caused by a lack of care, attention, or knowledge that may be caused by:

- Over training or dangerous training of players
- Over playing an athlete
- Failure to take into account the physical limits of a player or their pre-existing injuries or medical conditions
- Administering, condoning or failure to intervene in drug use

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of, or consents to what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include no-contact activities such as forcing children to look at or be involved in the production of pornographic material, to watch sexual activities or encouraging children to behave in sexually inappropriate ways.

Boys and girls can be sexually abused by males and/or females, including people to whom they are not related, and by other young people. This includes people from all walks of life.

Sexual Abuse in Sport

This could include contact and non-contact activities and may be caused by:

- Exposure to sexually explicit inappropriate language, jokes or pornographic material
- Inappropriate touching
- Having any sexual activity or relationship
- Creating opportunities to access children's bodies

Recognising Abuse

There follows a list of signs or symptoms of abuse. It is important to remember this list is not definitive or exhaustive. Any of these signs or behaviours has to be seen in the context of the child's whole situation and it is the combination with other information related to the child and his/her circumstances that may indicate abuse.

Emotional Abuse

- Low self esteem or continual self-deprecation
- Sudden speech disorder
- Significant decline in concentration
- Immaturity
- "Neurotic" behaviour (e.g. rocking, head banging)
- Self-Mutilation
- Compulsive stealing
- Extremes of passivity or aggression
- Running away
- Indiscriminate friendliness

Physical Neglect

- Constant hunger or tiredness
- Poor personal hygiene or poor state of clothing
- Frequent lateness and/or unexplained non-attendance at school
- Untreated medical problems
- Low self esteem
- Poor peer relationships
- Stealing

Neglect (Non-Organic Failure to Thrive)

- Significant lack of growth
- Weight loss
- Hair loss
- Poor skin or muscle tone
- Circulatory disorder

Physical Abuse

- Unexplained injuries or burns, particularly if they are recurrent
- Improbable excuses given to explain injuries or refusal to discuss injuries
- Untreated injuries, or delays in reporting them
- Excessive physical punishment by adult
- Arms and legs kept covered in hot weather
- Avoidance of swimming, physical education etc
- Running away or fear of returning home
- Aggression towards others

Sexual Abuse

Behavioural

- Lack of trust in adults **or** over familiarity with adults
- Fear of a particular individual
- Social isolation - withdrawal or introversion
- Sleep disturbance (eg. nightmares, bed-wetting, fears of sleeping alone, etc.)
- Running away from home
- Girls taking over the mothering role
- Sudden school problems e.g. falling standards truancy

- Reluctance or refusal to participate in physical activity or to change clothes for games
- Low self-esteem
- Drug, alcohol or solvent abuse
- Display of sexual knowledge beyond the child's age e.g. French kissing
- Unusual interest in the genitals of adults or children or animals
- Fear of bathrooms, showers, closed doors
- Abnormal sexual drawings
- Fear of medical examinations
- Developmental regression
- Poor peer relationships
- Over sexualised behaviour
- Compulsive masturbation
- Stealing
- Irrational fears
- Psychosomatic factors e.g. recurrent abdominal or headache pain
- Sexual Promiscuity
- Eating disorders

Physical/Medical

- Bruises, scratches, bite marks to the thighs or genital areas
- Anxiety/Depression
- Eating disorder e.g. anorexia nervosa or bulimia
- Discomfort/difficulty in walking or sitting
- Pregnancy - particularly when reluctant to name father
- Pain on passing urine, urinary tract problems, vaginal infections or genital damage
- Venereal disease/sexually transmitted diseases.
- Soiling or wetting in children who have been trained
- Self mutilation, suicide attempts
- Itch, soreness, discharge, unexplained bleeding from the rectum, vagina or penis
- Stained underwear
- Unusual genital odour

Physical Abuse - Special Notes

When considering the possibility of physical abuse it is important to remember that injuries may have occurred for many innocent reasons. Among the most important are: genuine accidental injuries, which are common; bleeding and clotting disorders; Mongolian blue spots (which occur naturally in Asian, Afro-Caribbean and Mediterranean children); skin disorders such as impetigo; rare bone diseases e.g. brittle bone; swelling or dislocation of the eye caused by tumour; undiagnosed birth injury, e.g. fractured clavicle.

Any suspicion of Physical Abuse must be reported in the normal manner according to this policy. However, medical concerns about an injury to a child or vulnerable adult should obviously be dealt with appropriately by First Aid and/or referral to Doctor/Hospital, depending on the nature of the injury.

Sexual Abuse - Special Notes

Not all children are able to tell that they have been sexually assaulted. Changes in a child's behaviour may be a signal that something has happened. It is important to be aware that in sexual assault there may be no physical or behavioural signs.

A child who is abused may have some signs which alert you to a problem. Try to notice changes in their usual behaviour. It is the combination of these signs that may indicate sexual abuse. It is always better to seek advice and discover that there is no problem than to ignore possible signs of abuse.

Racism and Bullying

Race and Racism

The Scottish Football Association has in place an on-going campaign called "Show Racism the Red Card", which is fully supported by Cowdenbeath Football Club, aimed at raising awareness on racism and equal opportunities. Children from black minority and ethnic groups (and their parents) may have experienced harassment, racial discrimination, and institutional racism. Although not a separate category of abuse, racism may be recognised as a specific type of emotional abuse under local child protection procedures.

All organisations, including football, working with children including those operating where black and ethnic communities are numerically small, should address institutional racism, defined in the Macpherson Inquiry Report on Stephen Lawrence as:

"The collective failure by an organisation to provide appropriate and professional service to people on account of their race, culture and/or religion"

Any suspicion or allegation of racism, whether by a member of staff, a player or even by a spectator or a parent should be reported to the Chairperson or the General Manager to be fully investigated and dealt with appropriately.

Bullying

The lives of many people are made miserable by bullying. Victims of bullying can feel lonely, isolated and deeply unhappy. It can have a devastating effect on a child's self-esteem, destroy their self-confidence and concentration. They may also become withdrawn and insecure, more cautious, less willing to take any sort of risk. They may feel it is somehow their fault or that there's something wrong with them and at the worst cause depression and/or feelings of worthlessness that lead to suicide.

As a result of the above and to ensure Cowdenbeath Football Club creates an atmosphere where bullying of children is unacceptable the guidelines for identifying and managing bullying have been developed. Bullying may be done by people in authority or with responsibility for children in their care or it may be done by other children.

Any suspicions or allegations that a Member of Staff might be bullying a child must be reported to the Child Protection Officer and will be dealt with through normal employment disciplinary procedures.

Bullying can be difficult to pick up because it often happens away from others and victims do not tend to tell. However you can watch for signs that may indicate the presence of bullying. The following signs are common in victims of bullying behaviour:

- hesitates to come to training/programme/session
- is often the last one picked for a team or group activity for no apparent reason, or gets picked on when they think your back is turned
- is reluctant to go to certain places or work with a certain individual/s
- has clothing or personal possessions go missing or damaged
- has bruising or some other injury
- keeps 'losing' their pocket money
- is quite nervous, withdraws from everybody else and becomes quiet and shy, especially in the case of those who are normally noisy and loud
- though usually quiet, they suddenly become prone to lashing out at people, either physically or verbally

Action to Help the Victim(s) and Prevent Bullying:

- Take all signs of bullying very seriously.
- Encourage all children to speak and share their concerns, however trivial they may seem.
- Create an open environment where children feel that they can tell the person in charge or someone in authority about behaviour which concerns them.
- Take all allegations seriously and take action to ensure the victim is safe.
- Speak to the victim(s) and the person thought to be bullying separately.
- Reassure the victim(s) that you can be trusted and will help them, although you cannot promise to tell no one else.
- Keep a record of what is said i.e. what happened, who did/said what, where and when it occurred, who else was present, etc.
- Report any concerns to the Child Protection Officer.

Action towards the Person Bullying:

- It is important to focus on the bullying behaviour - not to label the alleged perpetrator.
- Do not accuse the perpetrator of being a "bully" - refer to what has happened.
- Talk with the person about their behaviour. Explain the situation and try to get the person to understand the consequences of their behaviour.
- If appropriate, seek an apology from the person to the victim(s).
- If appropriate, there may need to be some negotiated recompense for the victim.
- Impose sanctions as necessary.
- Encourage and support the person to change their behaviour.
- Keep a written record of action taken.

In the case of an adult (whether or not a Member of Staff) bullying a child, the Child Protection Officer must be informed and disciplinary action may need to be taken.

In the case of bullying by a child then it may be appropriate to inform the child's parents of the concerns and the actions taken in regard to the child's behaviour. It would always be wise to involve a third party in such a discussion or meeting.

Minimising Abuse

It is the policy of Cowdenbeath Football Club for **all youth teams** to have at least two coaches present at all home and away matches as well as at all training/coaching sessions. Two coaches present will help to provide appropriate safeguards for children and coaches and minimise the opportunity for abuse. For example, in a situation where a child may need hospital attention, this will allow one coach to travel to the hospital with the player, while the remaining coach looks after the team.

Code of Conduct for the Care of Children and Young People

To minimise the risk of abuse (or any false accusations of abuse) the following guidelines for all Cowdenbeath Football Club staff involved with the development of young players must be followed:

ALWAYS..

- ☺ Treat everyone with respect and encourage players and staff to do the same.
- ☺ Be aware of risks - even in situations which require sensitivity, such as dealing with bullying, bereavement or abuse.
- ☺ Work with children or young people in a public and open environment.
- ☺ Work in pairs when dealing with potentially hazardous situations such as going into changing rooms or administering First Aid.
- ☺ Encourage open and frank communication between coaches and players.
- ☺ Encourage children to feel comfortable when reporting problems or behaviour they do not like.
- ☺ Follow up any concerns, allegations or complaints made by children.
- ☺ Behave in a professional and careful manner - and insist that others do the same.
- ☺ Follow the procedures and good practice outlined in this policy.
- ☺ Be willing to listen to advice and to adapt your own practice when necessary.

NEVER..

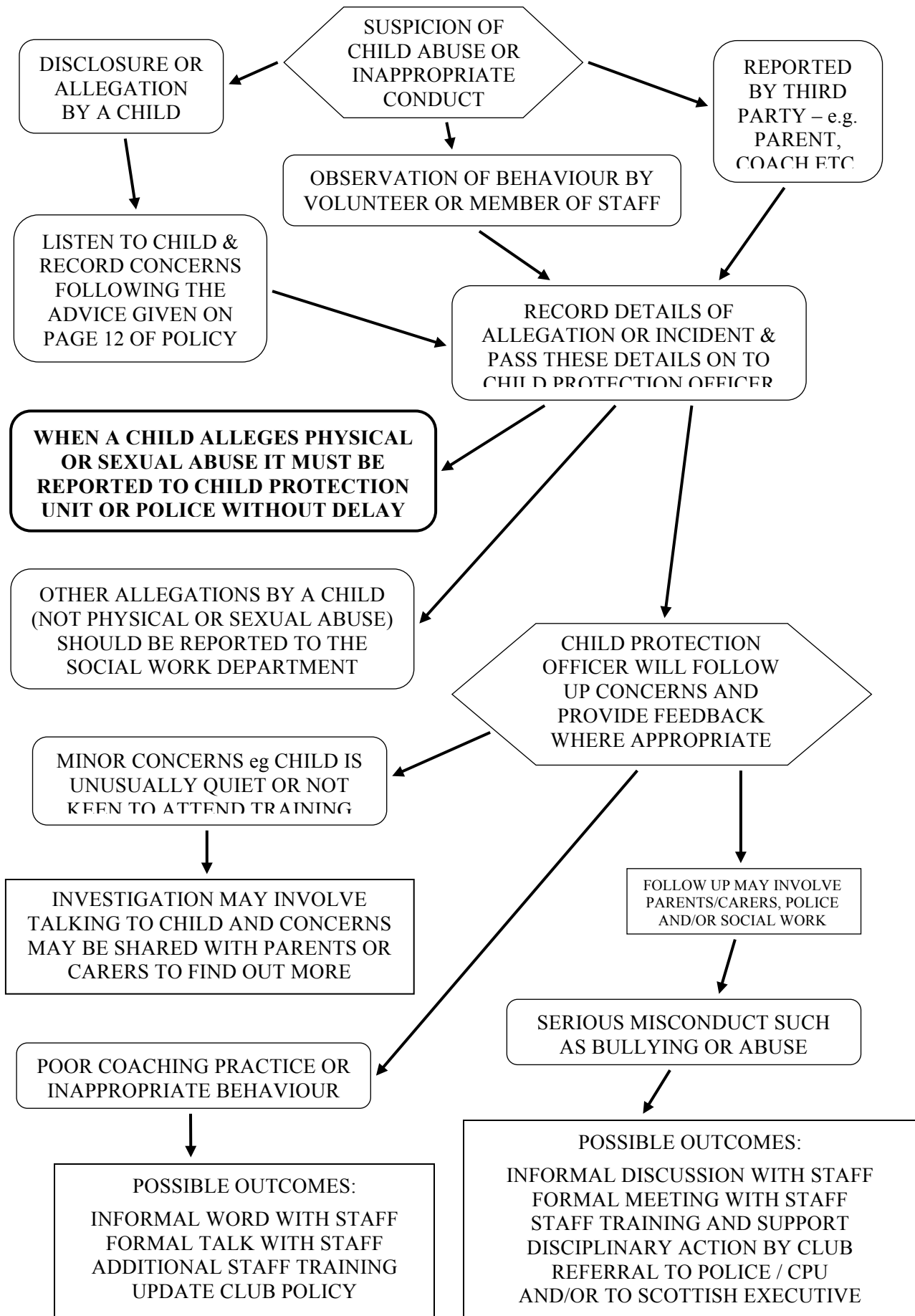
- ☹ Spend time alone with an individual child or show favouritism toward any child.
- ☹ Work or talk with players in private or unobserved.
- ☹ Take children or young people alone on car journeys, however short.
- ☹ Take or invite children or young people to your home.
- ☹ Agree to meet with children outside of football.
- ☹ Allow or engage in 'horse play' such as tickling or wrestling.
- ☹ Allow or engage in any inappropriate touching - ideally avoid all physical contact with players.
- ☹ Allow or engage in lewd or sexually suggestive talk or joking.
- ☹ Get drawn into attention seeking behaviour such as tantrums or crushes.
- ☹ Assume that your good name or reputation will protect you.
- ☹ Trivialise, joke about or exaggerate child abuse.
- ☹ Jump to conclusions about individuals.

Don't believe that "it could never happen to me". Take care to make sure that it can't.

Always feel free to discuss any questions you have about these guidelines or any concerns that you have with the Child Protection Officer or the Chairperson.

Note: there may be rare occasions when emergencies arise and staff cannot follow these guidelines to the letter, but as a rule these guidelines should be strictly followed.

How to deal with the suspicion of abuse



Responding to Disclosure of Abuse by a Child

When a child or vulnerable adult wants to share information about behaviour which they are not comfortable with or not happy about, concerning themselves or a friend, the adult must take certain steps to make sure they don't project their own ideas onto the child's disclosure.

Action will depend on the nature of the child's concerns. If the concerns are of a serious nature (eg. involving abuse or serious bad practice) the following procedure is to be followed. If the concerns are minor then not all of the following procedures will be appropriate.

- Listen carefully and react calmly so as not to frighten the child.
- Don't either show disbelief or confirm the comments being made by the child.
- Make sure the child is aware that they are not to blame and that they are right to tell someone if something is troubling them.
- Don't agree to confidentiality – you may always have to tell someone else.
- Take what the child says seriously and reassure the child.
- Don't make or show any judgements about what you are being told.
- Keep questions to the absolute minimum.
- If you need to ask questions, ask open-ended, non-leading questions e.g. What happened? Where did it happen? When did it happen? Who was there?
- Don't introduce personal information from your own experiences or those of other children.
- Make a full record of what has been said, as soon as possible, ideally in the child's own words.
 - Name, age & date of birth of the child
 - Home address and telephone number of the child (if available)
 - The nature of the allegation in the child's own words – what happened
 - Include times, dates, injuries to the child and any other relevant information
 - Details of any witnesses to the incident
 - Has the child's parent/carer has been contacted? Do not contact the parent/carer automatically, depending on the circumstances.
 - Details of anyone else who has been consulted and the information obtained from them
 - If it is not the child making the report, whether the child has been spoken to, if so what was said
- Record, sign and date, on the day, what you have recorded. (If possible, use the Referral Form).
- Do not make an electronic copy of the record.
- If the disclosure concerns allegations of physical or sexual abuse, immediately contact the Police or the Child Protection Unit (East).
- In other cases contact the local Social Work Department during office hours.
- You must also pass on your concerns to the Child Protection Officer.

Actions to Avoid

- Do not panic.
- Do not allow shock or distaste to show.
- Do not ask for more information than is offered.
- Do not speculate or make assumptions.
- Do not make negative comments about the alleged abuser.
- Do not approach the alleged abuser.
- Do not make promises or agree to keep secrets.
- Do not give a guarantee of confidentiality

Extra Information

Sharing concerns with Parents

Where the information suggests a concern

There is always a commitment to work in partnership with parents where there are concerns about their children. Therefore in most situations **not involving the possibility of child abuse**, it would be important to talk to parents to help clarify any initial concerns. For example, if a child seems withdrawn, there may be a reasonable explanation. He/she may have experienced an upset in the family, such as a parental separation, divorce or bereavement.

Where the information suggests abuse

However there are circumstances in which a child might be placed at even greater risk if concerns are shared e.g. where a parent/carer may be responsible for the abuse or where the parent/carer may not be able to respond to the situation appropriately. In these situations, any suspicion, allegation or incident of abuse must be reported as per Flowchart 1 “*How to deal with the suspicion of abuse*” (page 11) as soon as possible and recorded (see **Appendix 1** for referral form).

In all cases of alleged abuse, advice and guidance is to be sought from the local Social Work Department or Police as to who contacts the parents.

Allegations against a Member of Staff

Where the information suggests a concern

It is very important to minimise the risk of false accusations or rumours being spread about staff, just as it is vitally important to minimise the risk of abuse to children and vulnerable adults. Concerns about staff, however minor, should be dealt with quickly and in strictest confidence.

Where the information suggests abuse

Allegations of abuse by a member of staff will cause strong feelings, especially among other members of staff. Some may feel that it whatever is alleged could not possibly have happened. Others may experience anger or indignation. Integrity, confidentiality and speed of response are vital where abuse is alleged. It is not the responsibility of staff to decide whether or not a child has been abused. However, as with any other allegations of abuse, every individual must report their concerns.

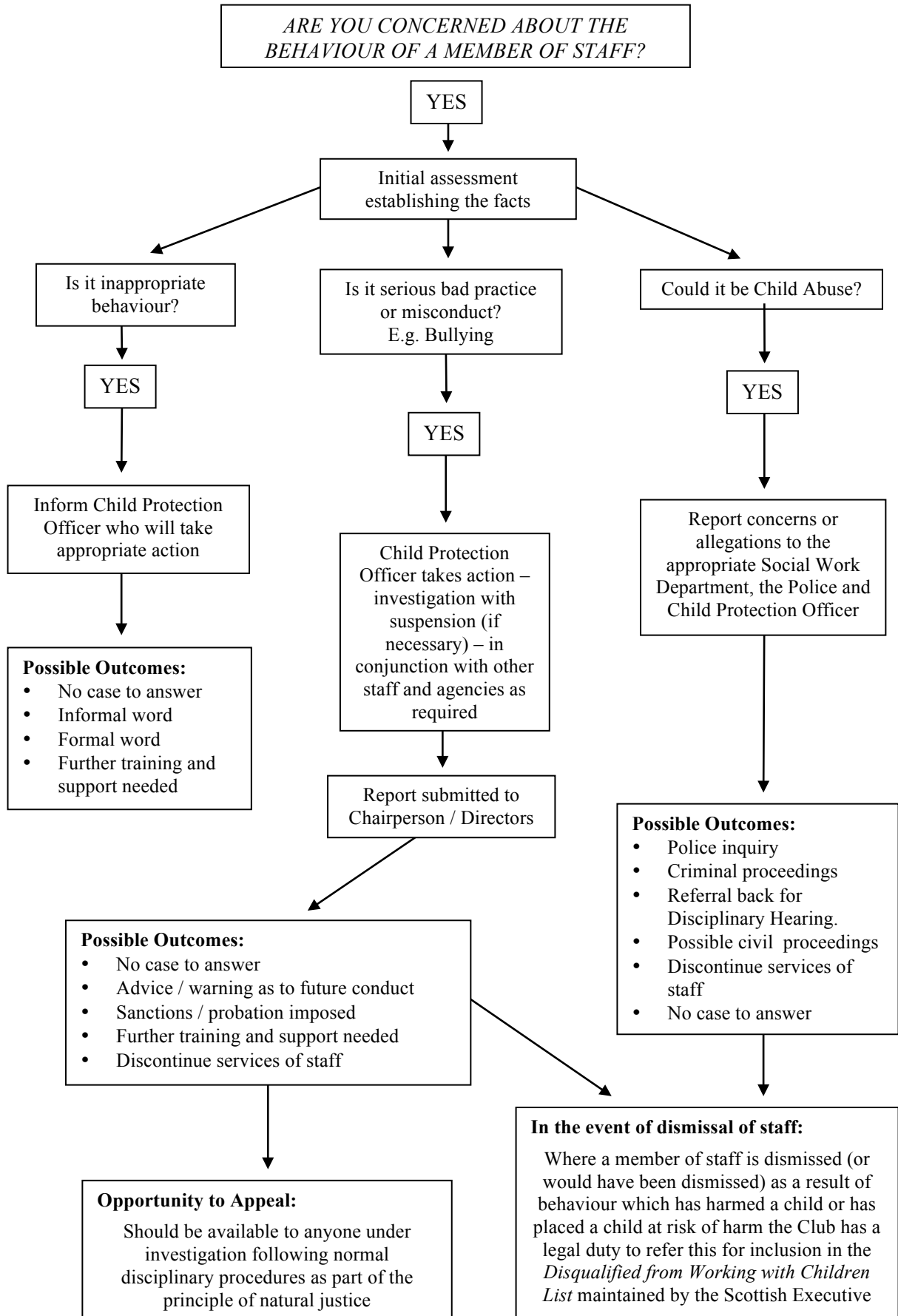
Interviewing Children

Following allegations made by or on behalf of a child

It is important that children are not subjected to potentially traumatic questioning about suspected or alleged abuse. In the event of an investigation into serious abuse there should be no attempt to interview any children by anyone other than the Social Services Department or the Police who are officially investigating it.

If a minor concern, for example a coach appearing to show favouritism, is being investigated then it would be appropriate to ask players about this in confidence, and in an open and safe environment.

Following up concerns about Staff



Managing Allegations against Staff

Purpose and status of the procedures

- These procedures aim to ensure that all allegations of abuse involving a child are dealt with in a timely and appropriate manner by following Flowchart 2 “*Following up concerns about Staff*” (page 14).
- These procedures do not stand-alone and should be read in conjunction with Cowdenbeath Football Club’s Disciplinary Procedures where the allegation relates to a member of staff.

Scope

- These procedures apply to all Cowdenbeath Football Club staff who have contact with children.
- Any allegation of abuse concerning a child will be taken seriously and appropriate action taken in accordance with the procedures detailed in this policy.

Principles

- Any information that raises concern about the behaviour of a member of staff or volunteer towards a child must be passed on as soon as possible in accordance with the procedures detailed below. No member of staff in receipt of such information shall keep that information to himself or herself, or attempt to deal with the matter on their own.

Initial Reporting of Information – Staff

- Any concerns for the welfare of a child arising from the behaviour of a member of staff must be reported to the Child Protection Officer or their representative immediately on the day, as soon as is practically possible.
- The Child Protection Officer must be consulted before any action is taken where there is uncertainty about whether the information constitutes possible abuse or not or if it is unclear what action should be taken.
- Where allegations concern poor practice rather than possible abuse, the Child Protection Officer should still be consulted and appropriate action taken as soon as is practically possible.
- Where information received suggests a complaint against a member of staff an initial assessment of the facts will be carried out which could result in a formal investigation, before any formal procedure is entered into.
- There may be three types of formal investigation: -
 - i. A disciplinary investigation
 - ii. A criminal investigation
 - iii. Civil proceedings (to sue or charge in the event of an unsuccessful prosecution) may also be initiated by the person / family who alleged the abuse
- The results of a criminal investigation may well influence the disciplinary investigation, but not in all cases.

Procedure – Establishing the Basic Facts

- Following receipt of information that may support an allegation of abuse, it is essential to establish the basic facts in order to determine the appropriate route by which to deal with the allegation.
- In a large proportion of cases it will be appropriate for an initial assessment to be carried out by the Child Protection Officer. This is because it is common for the information to be ambiguous or borderline, and the available facts may or may not support an allegation of abuse. The initial assessment may involve other staff who work with the person being investigated.
- The purpose of the initial assessment is to clarify the nature of the incident or misgivings that have led to the information being received and to establish whether there is reasonable cause to suspect or believe that a child is at risk.

- The initial assessment must be conducted before any formal action is taken.
- External agencies such as the Police and Social Work Department may be consulted for advice. This is important because they have an overview of child protection issues and may well have other information that together causes concern.
- The Child Protection Officer may appoint a person who has no direct involvement in the situation to undertake an immediate investigation into all the circumstances of the case.
- Following advice from the police, cases that also involve a criminal investigation will not preclude disciplinary action being taken provided sufficient information is available to enable the Child Protection Officer to make such a decision.
- In all cases where the facts support a possible allegation of abuse, the initial assessment may also form part of the disciplinary investigation.
- If appropriate, the member of staff about whom the allegation has been made may be approached as part of the information gathering process.
- Where the nature and seriousness of the initial information suggests that a criminal offence may have been committed, or to assess the facts may jeopardise the evidence, in these circumstances, advice should be sought from the Police before any approach is made to the member of staff.
- As each situation is unique, guidance cannot be prescriptive. As a general rule children should only be asked questions by professional agencies such as the Social Work Department or the Police.

Making a referral in cases of suspected abuse

- The Child Protection Officer or their representative will refer the allegation to the Social Work Department and the Police. Appropriate steps will be taken to ensure the safety of the child or children who may be at risk.
- If known, all information passed to the Police and Social Work Department should include the following:
 - Name, age & date of birth of the child
 - Home address and telephone number of the child (if available)
 - The nature of the allegation in the child's own words – what happened
 - Include times, dates, injuries to the child and any other relevant information
 - Details of any witnesses to the incident
 - Has the child's parent/carer has been contacted?
 - Details of anyone else who has been consulted and the information obtained from them
 - If it is not the child making the report, whether the child has been spoken to, if so what was said
 - Details of the member of staff against whom the allegation has been made
- Reporting of the matter to the Police or Social Work Department must not be delayed by attempts to obtain more information.
- Where possible any referral telephoned to the Police and Social Work Department should be confirmed in writing by the Child Protection Officer or their representative within 24 hours.
- A record should be made of the name and designation of the social work member of staff or the Police Officer to whom the concerns were passed together with the time and date of the call, in case any follow up is required.
- The parents or carers of the child will be contacted as soon as possible following advice from the Social Work Department and or Police in line with child protection procedures.

Procedure for managing the staff member against whom the allegation has been made

- Where the information gives reasonable cause to suspect or believe that alleged abuse has occurred the Police and Social Work Department must be notified as soon as possible on the day the information is received.
- After taking advice from the Police, if it is decided that the staff member against whom the allegation has been made is to be informed, the member of staff should be told that information has been received which may support an allegation of abuse. As the matter will be subjudice, no details will be given unless advised by the police.
- There must be an awareness of the need to preserve evidence for any criminal proceedings while at the same time safeguarding the rights of the member of staff.
- The Scottish Office has recommended that the general rule should be that anyone charged with this responsibility, after applying basic tests of logic and credibility, should always notify the Police before interviewing the person against whom the allegation has been made.

Suspension

- A precautionary suspension is **not** a form of disciplinary action for a member of staff. The member of staff may be suspended whilst an investigation is carried out.
- For an allegation made against a member of staff, the Child Protection Officer or the manager dealing with the disciplinary situation will normally carry out any necessary suspension.
- At the suspension interview the employee will be informed of why the suspension is taking place (subject to the advice given above) and given the opportunity to give a statement should he/she wish. Notification of the suspension and the reasons for it will be conveyed in writing to the employee within three working days of being informed of their suspension.

Allegations of Previous Abuse (Historical Abuse)

An adult who was abused may make allegations of abuse some time after the actual event and allegations such as this may involve a member of staff who is still currently working with children. Where such an allegation is made, the club should follow the foregoing procedures and report the matter to the Social Work Department or the Police. This is to protect other children, either within or outside football, who may be at risk from this person.

False or Malicious Allegations

Where an investigation of abuse has been conducted and is unfounded the staff member will receive an account of the circumstances and investigation. A letter will be provided confirming the conclusion of the matter. After reviewing the details of the account of the circumstances or the investigation, should it become clear that the allegation has been malicious or unfounded, the person may wish to seek legal advice where appropriate.

Cowdenbeath Football Club will take all reasonable steps to support the individual in this situation. In these circumstances the Club reserves the right to discontinue a child's access to that activity.

Data collected for the investigation will be destroyed in accordance with the requirements of the Data Protection Act 1998.

The Disqualified from Working with Children List

The Protection of Children (S) Act 2003 creates a legal duty on organisations to make a referral to Scottish Ministers if a person working in a child care position (paid or unpaid) either harms a child or puts a child at risk of harm AND is dismissed or moved away from contact with children as a consequence (or would have been dismissed if they had not resigned, retired, been made redundant or left at the end of a temporary contract). It is the duty of the Child Protection Officer to ensure that this is done.

Medical Help

It is crucial for the purposes of establishing child abuse that the appropriate medical is done, appropriate consents obtained and (as recommended in the Clyde Report) that a child is not subjected to multiple medicals e.g. for sexual abuse it is a forensic medical requiring two doctors.

Other than in rape cases, these are usually planned and are child centred. It is very important to note that immediate medical treatment is not required in many child abuse cases. It will not always be a requirement to take the child to a hospital.

The medical examination for the purposes of establishing child abuse is normally done under the auspices of the Local Authority Child Protection Guidelines and arranged by the Police or the Social Work Department.

In the very exceptional circumstances, unless the child requires immediate medical help, then this shall be dealt with by the relevant authorities.

The Law and Medical Consent: Children

In some cases it may be necessary to obtain consent for medical examination, treatment or procedure to a child e.g. where an injury has occurred in the course of training or competition.

The purpose of this guidance is to provide an overview of the Law in Scotland in relation to medical consent and to advise staff members on the best practice that must be followed.

Medical Treatment for Children - Who can give consent?

The Age of Legal Capacity (Scotland) Act 1991 allows children **under the age of 16** to give their own consent in certain circumstances. Section 2 (4) states:

“A person under the age of 16 shall have legal capacity to consent on his/her own behalf to any surgical, medical or dental procedure or treatment where, in the opinion of a qualified medical practitioner attending him, he is capable of understanding the nature and possible consequences of the procedure or treatment”

The decision about competence is entirely one for the doctor or other medical practitioner to make. This means that where a child is assessed as being capable of providing consent, the consent of a parent/carer is not required for medical treatment.

If the Child cannot give consent ...

Person with Parental Responsibilities in relation to the child.

The consent of a person who has parental responsibility towards the child should normally be required under the Children (Scotland) Act 1995 as this responsibility includes a duty to safeguard and promote the child's health, development, and welfare.

If a child's parents are or have been married to each other, both have parental responsibility and either can give consent. If the parents have not been married to each other, normally only the mother has automatic parental responsibility including the right to consent. The father will have the right to consent if either:

- he has obtained an order from the court awarding him parental responsibilities
- he and the child's mother have a registered parental responsibilities agreement

Person who has care and control of the child

Section 5 of the Children (Scotland) Act 1995 also allows consent to be given by those who have care or control of a child but who do not have either parental responsibilities or parental rights in respect of the child e.g. a grandparent who is the child's main carer. These people have a duty to do what is reasonable in all the circumstances to safeguard the child's health, development, and welfare. This includes giving consent to treatment or procedures.

Such consent would not be effective however, where:

- The child is capable of consenting
- The person knew that the parent would not consent e.g. a parent who is a Jehovah Witness
- The medical examination was for the purpose of establishing child abuse

If the child is looked after by the Local Authority, the authority can give consent only if it has obtained a Parental Responsibilities Order from the court or consent is authorised by conditions attached to an order or warrant issued by a Court or Children's hearing.

Coach Recruitment

1. Apply agreed procedures to all coaches and volunteers

In order to minimise risk and to ensure appropriate safeguards are in place, Cowdenbeath Football Club will take all necessary steps to ensure that all applicants go through a rigorous recruitment programme (as shown in **Appendix 2**) which involves taking all necessary steps to ensure that young players are protected. **Appendix 3** is the Coach Employment Checklist which the Club uses to mark each stage of the recruitment process as it is completed for each coach.

2. Treat all applicants for positions involving contact with children in the same way

On issuing the Job Description, person specification and application form, the applicants should submit their Application Form (**Appendix 4**) detailing previous experience in working with young players and also identifying at least two references. It is advised that one should be associated with former work with children or young people and one with previous sport involvement. They should also complete and return their Self Declaration Form (**Appendix 5**).

3. Gain a degree of background knowledge from a person who has experience of the coach working with young players

Cowdenbeath Football Club will investigate each reference given (Referees will be sent a reference form to complete (**Appendix 6**) and will investigate the coach's previous experience.

Where the coach has no previous experience of voluntary or paid contact with young people, two references will be sought from reputable persons (not relatives) who can comment on the applicant's character and relationships with others.

In addition, successful candidates will be asked to complete a Disclosure Scotland Application and appointment will be subject to satisfactory response from Disclosure Scotland.

4. Explore all applicants' experience of working or contact with young people in an interview before appointment

On successful completion of the Application Form and the Disclosure Scotland Check results, the applicant will be invited for an interview, at which the applicants' level of experience with working with young people will be explored.

5. Make all appointments conditional on the successful completion of probation

Once selected for the position, the coach goes through an Induction Programme and has their roles and responsibilities (**Appendices 7 [i] & 7 [ii]**) clearly marked out for them. An experienced person will then mentor the new recruit for a probationary period of 3 months. In addition, a Personal Details Form (**Appendix 8**) is required to be filled out to be kept on file.

On completing a successful probationary period, the new recruit will be established as a coach / manager / official. From then, supervision and performance review will be undertaken in the normal course of coaching management.

Policy on the Recruitment of Ex Offenders

1. Cowdenbeath Football Club complies fully with the Code of Practice, issued by Scottish Ministers, in connection with the use of information provided to registered persons and other recipients of information by Disclosure Scotland under Part V of the Police Act 1997, for the purposes of assessing applicants' suitability for positions of trust. We undertake to treat all applicants for positions fairly and not to discriminate unfairly against the subject of a Disclosure on the basis of conviction or other information revealed.
2. We have a written policy on the recruitment of ex-offenders, which is made available to all Disclosure applicants at the outset of the recruitment process.
3. We are committed to equality of opportunity and to following practices and providing a service which is free from unfair and unlawful discrimination. We ensure that no applicant or member of staff is subject to less favourable treatment on the grounds of gender, marital status, race colour, nationality, ethnic or national origins, age, sexual orientation, responsibilities for dependants, physical or mental disability, or offending background, or is disadvantaged by any condition which cannot be shown to be relevant to performance.
4. Cowdenbeath Football Club actively promotes equality of opportunity for all persons with the right mix of talent, skills and potential, and welcomes applications from a wide range of candidates, including those with criminal records. The selection of candidates for interview will be based on skills, qualifications and experience.
5. We will request an Enhanced Disclosure only where this is considered proportionate and relevant to a particular position. Every position, voluntary or paid, which could involve the training or supervision of children, young people or vulnerable adults, will be subject to an Enhanced Disclosure. Where a Disclosure is deemed necessary for a post or position, all applications forms, job adverts, careers literature, website, and any other appropriate literature will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.
6. Where a Disclosure is to form part of the recruitment process, CFC will encourage all applicants selected for interview to provide details of their criminal record at an early stage in the application process. We ask that this information be sent under separate, confidential cover, to a designated person within Cowdenbeath Football Club and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process.
7. In line with the Rehabilitation of Offenders Act 1974, Cowdenbeath Football Club will only ask about convictions which are defined as "unspent" in terms of that Act, unless the nature of the position is such that we are entitled to ask questions about an individual's entire criminal record.
8. At interview, or under separate discussion, we undertake to ensure an open and measured discussion on the subject of any offences or other matters that might be considered relevant for the position concerned. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
9. We undertake to discuss any matter revealed in a Disclosure with the subject of that Disclosure before withdrawing a conditional offer of employment, unless instructed not to reveal such information by Disclosure Scotland.
10. We ensure that all those in Cowdenbeath Football Club who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to employment of ex-offenders (e.g. the Rehabilitation of Offenders Act 1974).
11. We undertake to make every subject of a Disclosure aware of the existence of the Code of Practice, and to make a copy available on request.

HAVING A CRIMINAL RECORD WILL NOT NECESSARILY DEBAR YOU FROM WORKING WITH COWDENBEATH FOOTBALL CLUB. THIS WILL DEPEND ON THE NATURE OF THE POSITION, TOGETHER WITH THE CIRCUMSTANCES AND BACKGROUND OF YOUR OFFENCES.

Policy on the Secure Handling of Disclosure Information

General Principles

Cowdenbeath Football Club complies fully with the Code of Practice, issued by Scottish Ministers, regarding the correct handling, holding and destroying Disclosure information provided by Disclosure Scotland under Part V of the Police Act 1997, for the purposes of assessing applicants' suitability for positions of trust. It also complies fully with the Data Protection Act 1998 and other relevant legislation regarding the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters. This policy is available to anyone who wishes to see it.

Usage

We use Disclosure information only for the purpose for which it has been provided. The information provided by an individual for a position Cowdenbeath Football Club is not used or disclosed in a manner incompatible with the purpose. We process personal data only with the express consent of the individual. We notify the individual of any non-obvious use of the data, including further disclosure to a third party, identifying the Data Controller, the purpose for the processing, and any further relevant information.

Handling

Cowdenbeath Football Club recognises that, under section 124 of the Police Act 1997, it is a criminal offence to disclose Disclosure information to any unauthorised person. We, therefore, only pass Disclosure information to those who are authorised to see it in the course of their duties. Cowdenbeath Football Club will not disclose information provided under section 115(8) of the Act, namely information which is not included in the Disclosure, to the applicant.

Access and Storage

We do not keep Disclosure information on an individual's personnel file. It is kept securely, in lockable, non-portable storage containers. Access to storage units is strictly controlled to authorised and named individuals, who are entitled to see such information in the course of their duties.

Retention

We do not keep Disclosure information for any longer than is required after recruitment (or any other relevant) decisions have been taken. In general, this should be no longer than six months (to allow for the resolution of any disputes or complaints). Disclosure information will only be retained for longer than this period in exceptional circumstances, and in consultation with Disclosure Scotland. The same conditions relating to secure storage and access will apply during any such period.

Disposal

Once the retention period has elapsed, we will ensure that Disclosure information is immediately destroyed in a secure manner i.e. by shredding, pulping or burning. Disclosure information which is awaiting destruction will be kept securely, in lockable, non-portable storage containers. We will not retain any image or photocopy or any other form of the Disclosure information. We will, however, keep a record of the date of issue of the Disclosure, the name of the subject, the Disclosure type, the position for which the Disclosure was requested, the unique reference number of the Disclosure and details of the recruitment decision taken.

Umbrella Bodies

Before acting as an Umbrella Body (i.e. a body which countersigns applications for Standard or Enhanced Disclosures on behalf of another organisation, Cowdenbeath Football Club will take all reasonable steps to ensure that the organisation on whose behalf we are acting can comply with the Code of Practice. We will also take all reasonable steps to satisfy ourselves that they will handle, use, store, retain, and dispose of Disclosure information in full compliance with the Code of Practice, and in full accordance with this policy. We will also ensure that any body or individual at whose request applications for Disclosures are countersigned has such a written policy and we will, if necessary, will provide a model policy for that body or individual to use or adapt for this purpose.

Use Of Photographic & Video Equipment

Consent - Photographs (including Digital Images), Videoing and Filming of Children

In all circumstances where children are likely to be photographed or video-recorded or digital images taken, it is necessary to obtain appropriate consent. Staff should ask all parents to complete the standard Consent Form (**Appendix 9 [i]**) when enrolling in any Cowdenbeath Football Club youth activity or going on a trip. Although children can consent to having their photographs taken from 12 years of age so long as the child understands the implications (see **Appendix 9 [ii]**), consent should also be provided by parents; this will ensure that both parties legal rights are met. A judgement call will have to be made for some children with learning difficulties over 12. If in doubt parental consent should be sought. Records should be kept in a secure and confidential file. It will be the responsibility of the Parent/Carer to inform of any change in circumstances.

Storage

Photographs and Videos should be stored in line with the Data Protection Act i.e. all negatives and master copies should be in a secure place and labelled clearly. The video/photographs should not be kept for a longer period than is necessary i.e. the purpose for which they were taken.

Digital images should be stored on a **secure system** and deleted when they are no longer required. If the images are to be stored on a fileserver then access should be controlled by a password.

Video, Film or Photographs (including digital images) as an Educational Aid

Consent is collected from the parents/carers of the child (**Appendices 10 [I] & [ii]**) and they should be informed:

- The reason for use of the video, film or photographs
- How the equipment will be used
- How the video, film or photograph will be processed
- Who will have access to the video, film or photographs
- Where the film, video or photographs will be stored
- How long the film, video or photographs will be kept

Concerns about Photographers, Video or Film Operators

Any concerns with the manner in which or the products of photographers or video or film operators are to be reported to either the Line Manager or the General Manager.

Children in Publications and on the Internet

Football websites and publications provide excellent opportunities to broadcast achievements of individuals to the world and to provide a showcase for the activities of young people. It can however, also provide information about children that could put them at risk. The following procedure is to be followed to ensure publications and the Internet do not put children at risk.

Publications and the Internet must adhere to the following:

- At no time is a publication or Internet site to include personal information that could identify a child e.g. home address, e-mail address, telephone number of a child. Any contact information needs to be directed to either a general Cowdenbeath Football Club address or another relevant organisation's address e.g. a governing body or club.
- Before publishing any information, written consent needs to be obtained from the child's parent/carers. If the material is changed from the time of consent, the parents/carers must be informed and consent provided for the changes.
- Pictures or videos of children or a picture giving limited additional information may be used.
- The content of pictures or videos of children are to be reviewed to ensure they are not portraying the child in a demeaning or tasteless manner. Where there are concerns about identifying a child per se who is to be included use photographs or shots that show the child:
 - In profile
 - With their backs to the cameras
 - Their faces are not clearly visible

- The content of photographs or videos must not depict a child in a provocative pose or in a state of partial undress other than when depicting a football activity. Where relevant, a tracksuit may be more appropriate attire.
- For photographs or videos of groups or teams of children ensure that only the group or team is referred to, not individual members.
- All published events involving children will require review to ensure the information will not put children at risk. Any publications of specific meetings or child events e.g. team coaching sessions, are not to be distributed to any individuals other than to those directly concerned.
- Particular care is to be taken in publishing photographs, films or videos of children who are considered particularly susceptible e.g. a child who may be the subject of a child protection case or a matrimonial dispute where it is known.
- Particular care is to be taken in publishing photographs, films or videos of children with physical, learning and/or communication or language disabilities, as they could be particularly susceptible to abuse (Morgan, 1979; Watson, 1984).

Important Note: Any concerns or enquiries about publications or Internet information are to be discussed with General Manager.

Organised Events - Photographs (including Digital Images), Videoing and Filming of Children

There is evidence that some people have used football venues as an opportunity to take inappropriate photographs or film footage of children. The following procedures have been developed to protect children and to minimise risk.

For activities or events where children are participating which are not in a public place:

- Anyone wishing to use photographic / film / video equipment at a venue must obtain the approval of the General Manager.
 - Professional photographers, film or video operators wishing to record the activity or event should seek accreditation with the event organiser by producing their professional identification for the details to be recorded. Ideally this should be requested at least five working days before the event.
 - Students or amateur photographer, film or video operators wishing to record the activity or event should seek accreditation with the event organiser by producing their student card or a relevant letter from the organisation they represent e.g. club outlining their motive for attending the event.
- The General Manager must record all details of photographers, film and video operators, including professional identification or relevant consent information (**Appendix 10 [i]**).
- An activity or event specific identification badge / sticker must be provided to and clearly displayed at all times by accredited photographers, film and video operators on the day of the activity or event.
- The requirements above should be publicly promoted to ensure all people present at the event understand the procedure and are aware of where to proceed with it and who to contact if concerned.
- No unsupervised access or one-to-one sessions are to be permitted unless this has been approved in advance and appropriate vetting has occurred e.g. Disclosure Scotland check.

NB Cowdenbeath Football Club has no control over who can take photographs or video in a public space unless they present themselves as a demonstrable risk to children.

¹ Morgan S R (1979), *Psycho-Educational Profile of Emotionally Disturbed Abused Children*, Journal of Clinical Psychology, 8(1) pp3-6. Watson G (1984), *Sexual Attitudes and Knowledge of Children with Mild and Moderate Learning Difficulties*, G Campbell (ed.) Health Education and Youth, Falmer Press.