



## **Celtic FC Foundation**

### **Safeguarding – Child Wellbeing and Protection Policy**

#### **INTRODUCTION**

We are fully committed to the wellbeing and protection of everyone involved in Celtic FC Foundation. We aim to create a safe and inclusive environment, one that respects the dignity and human rights of everyone involved.

Celtic FC Foundation will work to promote a safe and inclusive environment for all. Safeguarding is a core responsibility, we commit to having robust and inclusive policies and guidance in place to give clarity on how we safeguard and protect individuals at risk, and how we share our concerns about wellbeing and harm.

We operate to the highest standards and respect the trusted position we are in.

All projects and fundraising events we deliver are planned and risk assessed. We ensure that every project we deliver or event we put on, is safe and inclusive.

A rights-based approach focuses on the indisputable human rights of each individual and our responsibility to promote, respect and protect these rights. It gives importance to process as well as outcomes and recognises the underlying determinants of children's needs, presenting issues and general wellbeing.

#### **1.1 Definitions**

##### **Definition of the Child Wellbeing and Protection Policy**

Celtic FC Foundation Child Wellbeing and Protection Policy includes:

- Introduction – Overarching Aim, Definitions, Children's Wellbeing in Scotland, Everyone's Responsibility and Review
- Policy Statement
- Set the Standards – Behaviours, Expectations and Requirements
- Procedures – Appointment and Selection, Responding to Concerns and Case Review
- All associated Practice Notes

Herein all the documents listed above will be referred to as the 'Child Wellbeing and Protection Policy' or 'this policy'.

### **Definition of Child**

Article 1 of the United Nations Convention on the Rights of the Child states that everyone under 18 has the rights set out in the Convention. Within the Children and Young People (Scotland) Act 2014, a child is defined as anyone who has not reached the age of 18.<sup>1</sup>

For the purpose of this policy “children”, “child”, “young person” and “young people” refer to any persons under the age of 18.

The Child Wellbeing and Protection Policy applies to all children and young people regardless of age, *gender, sexual orientation, disability, race, religion, nationality, socio-economic status or family circumstance.*

### **Definition of Adult**

*For the purpose of this policy an “adult” is any individual aged 18 and over or any individual under the age of 18 years old but who is in a ‘position of trust’.*

### **Definition of Child Abuse**

*Child abuse is the act or omission that harms a child or young person.*

*An individual may abuse a child or young person directly, or may indirectly be responsible for abuse because they fail to prevent another person from harming that child or young person, or their inaction leads to harm or the risk of harm. Abuse can be physical, emotional, sexual or by neglect. Abuse can take place in person or online. Although typically thought of as when an adult is mistreating a child or young person, children and young people can also be perpetrators of abuse against other children or young people.*

### **Definition of Safeguarding**

*Safeguarding is taking action to ensure that all children and young people are safe from harm. It means proactively doing everything possible to minimise risk and prevent abuse of children and young people.*

### **Definition of Child Protection**

*Child protection refers to the actions in response to a specific concern for a child or young person who is at risk or suffering from abuse. Child protection is an essential part of safeguarding if there is a concern that a child or young person is being abused or their safety is compromised.*

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<sup>1</sup> Children and Young People (Scotland) Act 2014 section 97(1)

## 1.2 Children's Wellbeing in Scotland

### **Getting It Right for Every Child**

The Scottish Government's Getting It Right for Every Child (GIRFEC) is based on children's rights, and its principles reflect the United Nations Convention on the Rights of the Child (UNCRC). The GIRFEC approach is child focused, based on an understanding of the wellbeing of a child or young person in their current situation, and based on tackling needs early in a collective way. As part of the Children and Young People (Scotland) Act 2014, the concept of wellbeing and the GIRFEC approach is now enshrined in law in Scotland.

The GIRFEC approach supports children and young people so that they can grow up feeling loved, safe and respected, and can realise *their* full potential. Children and young people should be; Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible, Included. These are the eight wellbeing factors and are commonly known as SHANARRI Indicators.



A child or young person's wellbeing is influenced, both positively and negatively, by everything around them and the different experiences and needs they have at different times in their lives. There is no set level of wellbeing that a child or young person should achieve, but each child should be helped to reach *their* full potential as an individual. The wellbeing indicators make it easier for everyone to be consistent in how they consider the quality of a child or young person's life at a particular point in time.

By having a universal language and understanding for everyone who works with children and young people, collectively we can contribute to promoting, supporting and safeguarding a child's wellbeing whether they are in an educational, health, community or sport setting. It is essential that the wellbeing indicators are understood and if worried that something is impacting a child or young person's wellbeing, staff and volunteers know how to respond and with whom to share that information.

## Wellbeing Concern

A wellbeing concern is if a child's wellbeing (measured using the 8 SHANARRI indicators) is, or is at risk of being, adversely affected.

A range of experiences can have a negative impact on children and young people. These can range from harmful or abusive behaviour to a family bereavement or social economic factors, such as poverty. The nature of a wellbeing concern will influence how to support the child or young person.

Behaviour which is abusive or neglectful and is, or is likely to cause harm, will often be referred to as a 'child protection concern'. Regardless of whether a concern is a wellbeing or child protection concern, it must be responded to in line with the Responding to Concerns Procedure.

### *Children and young people who are deaf and disabled*

In line with Article 23 of the United Nations Convention on the Rights of the Child (UNCRC), a child with a disability "*should enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community*".

Children and young people who have a disability have the same needs as other children and young people, but may also have additional needs associated with their disability. For example, additional steps may be needed to promote their wellbeing or they may be at an increased risk of abuse due to their vulnerability.

Research has shown that children with a mental or physical disability are *more likely* to be abused than non-disabled children.<sup>2</sup>

Children and young people who are deaf, disabled or have a learning disability can be additionally vulnerable because they may:

- Depend on a number of people for care and handling, some of which can be intimate care
- Depend on the abuser for their involvement in sport
- Fear disclosing abuse
- The signs of abuse can be misinterpreted as a symptom of the disability
- Have a reduced capacity to resist either verbally or physically
- Have significant communication differences – this may include very limited verbal communication, the use of sign language or other forms of non-verbal communication
- Lack a wide network of friends who support and protect them
- Lack access to peers to discover what is acceptable behaviour or to understand the inappropriateness of actions
- Not be believed due to negative attitudes towards children and young people with disabilities or possible failure to recognise the impact of abuse on children and young people with disabilities

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<sup>2</sup> Source: Jones, L et al *Prevalence and risk of violence against children with disabilities: a systematic review and meta-analysis of observational studies (NSPCC) (2012)*

### **Children and young people from Black, Asian and Minority Ethnic communities**

The UNCRC sets out the general principle of non-discrimination and that children should be protected from all forms of discrimination. It also states that children have the right to learn and use the language, customs and religion of their family, whether or not these are shared by the majority of people in the country where they live<sup>3</sup>. Unfortunately within wider society, discriminatory behaviour still exists therefore children and young people from black and ethnic communities are additionally vulnerable because they may:

- Experience racism and racist attitudes
- Experience people in authority ignoring or not responding to racist abuse or comments
- Experience no action being taken by others for fear of upsetting cultural norms
- Be afraid of further abuse if they challenge others
- Want to fit in and not make a fuss
- Be using or learning English as a second language

### **Everyone's Responsibility**

The responsibility to safeguard, promote, support, and protect a child or young person's wellbeing does not rest on one person: **we are all** responsible.

Supporting and promoting a child or young person's wellbeing at all times includes forming positive relationships, understanding their circumstances and responding appropriately to any concerns about their wellbeing. To ensure we can respond when a child or young person needs help or support, we must firstly understand their rights and the meaning of wellbeing. Secondly, we must recognise and acknowledge the risks that exist for children and young people and put in place a range of safeguards that minimise these risks. Leadership is essential to ensure that these safeguards are managed and promoted, and this will be done by staff and volunteers within particular roles at the Foundation who receive specific training for their level of responsibility. However, *everyone* must understand the risks associated for children and young people, and the appropriate processes which are in place should a child or young person's wellbeing be at risk or they are in need for protection.

Everyone has the responsibility to recognise the concern, to ensure the child or young person is safe if they are at risk of *immediate* harm, and to report the concern to Celtic FC's Safeguarding Manager and Head of Foundation in line with the Responding to Concerns Procedure.

The Child Wellbeing and Protection Policy combined with relevant training, mentoring and support will give us the confidence and support needed to fulfil our role and responsibility to keep children and young people safe. In addition to this, advice can be sought at any point from Celtic FC's Safeguarding Manager.

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<sup>3</sup> Article 30 of the United Nations Convention on the Rights of the Child

<sup>4</sup> Brackenridge, C.H (2010) 'Myths and evidence – learning from our journey', keynote address to the conference 'How Safe is Your Sport' held at the Excel Sports Centre, Coventry on 25 Feb, hosted by the Coventry Sports Foundation and the NSPCC Child Protection in Sport Unit - <http://bura.brunel.ac.uk/handle/2438/4177>

## **Review**

The Child Wellbeing and Protection Policy will be regularly reviewed and will include children and young people's participation and feedback on the content and actual experience of implementation as part of the review.

This policy will be reviewed:

- In accordance with changes in legislation and guidance on children's wellbeing, protection or rights
- Following the review of an issue or concern raised about the wellbeing or protection of children within the Foundation, when the case review suggests that this policy should be reviewed
- In all other circumstances, at least every three years.

## **SAFEGUARDING POLICY STATEMENT**

Celtic FC Foundation is committed to ensuring that everyone, in any capacity, is able to participate in an enjoyable and safe environment, which promotes inclusion and protects them from harm, poor practice, exploitation, bullying or abuse.

**Wellbeing and Protection policies are based on the following principles:**

1. We will act in the best interests of children, young people and adults
2. The protection and wellbeing of all our participants in our care is everyone's responsibility
3. The person's rights, wishes and feelings should be respected and promoted.

All staff, when involved in Foundation activities, will be:

### **INCLUSIVE**

We celebrate what makes us unique and embrace our differences. We create a culture where rights are respected and everyone is treated fairly, with dignity and respect.

### **APPROACHABLE**

We are visible, accessible, open and caring. We build respectful and supportive relationship.

### **EMPOWERING**

We are forward facing and strive to be the best for our participants. We challenging ourselves and others to continually strive for the best outcomes for our participants. We encourage and support expression of their views.

## SETTING THE STANDARDS

At Celtic FC Foundation all staff and volunteers who are engaged in activities involving regulated work with children are expected to agree to the terms of a Code of Conduct. This detail the standards and practice required by all Celtic FC Foundation staff and volunteers, including verbal and non-verbal communication and actions, when involved in activities with children. Those in regulated work are required to read and sign these codes of conduct to demonstrate understanding and agreement.

Every member of staff and volunteer at the Foundation will be asked to sign up to the following standards, outlining the behaviour, expectations and requirements of Foundation staff and volunteers working or volunteering with children and young people.

Celtic FC Foundation's Wellbeing and Protection Values promote everything we do:

**Respect** -we listen and act with kindness, compassion and respect

**Integrity**- is doing the right thing when no one is watching and adhering to the highest standards at all time

**Commitment** - we are committed to working together, to support each other and to see things through

**Support** - to build and maintain healthy relationships with the community, children & young people, vulnerable adults and our staff.

Celtic FC Foundation believes that our values must be upheld at all times. A successful team is one where these values are demonstrated by all. We are asking you to help 'Set the Standards' by agreeing to champion and uphold the wellbeing and safety of all.

We request that all Celtic FC Foundation colleagues:

- Encourage project participants to participate and show respect to others and respect their decisions.
- Demonstrate respectful behaviours at all times and never use foul, abusive or offensive language
- Help children, young people and vulnerable adults to achieve their goals aligned with the specific project.
- Never force project participants to take part in activities if they do not want to.
- Champion children's rights when working with children and young people.
- Demonstrate appropriate use of social media (i.e. Facebook, Twitter, Instagram etc.
- Any concerns raised by children, young people and vulnerable adults about any wellbeing or the conduct of a colleague should be reported to the Head of Foundation or Celtic FC Safeguarding Team at [safeguarding@celticfc.co.uk](mailto:safeguarding@celticfc.co.uk). This does not affect the individual's right to contact their local social services or the police if they feel it is necessary.

By signing this Code of Conduct, I agree to follow these values and I am aware that there may be consequences for me if I breach the Code:

All breaches of these codes of conduct will be taken seriously and handled in line with the Foundation's procedures for responding to concerns about the conduct of an adult or member of staff.

## **SAFE WORKING PRACTICES**

The following safeguards are a combination of best practice and guidelines to support children and adults in a range of situations and create safe working practises. Their purpose is to minimise risks that have been identified through previous experience and risk assessment:

1. ANTI-BULLYING
2. RELATIONSHIPS
  - 2.1 Positive Relationships
  - 2.2 Positions of Trust
  - 2.3 Grooming
  - 2.4 Peer on Peer Abuse
3. BEHAVIOURS:
  - 3.1 Planning activities
  - 3.2 Agreeing acceptable and unacceptable behaviours
  - 3.3 Managing Behaviour
  - 3.4 Physical interventions and contact
  - 3.5 Sexual activity
4. CELEBRATION
5. COMMUNICATION & SOCIAL MEDIA
6. HEALTH
  - 6.1 First Aid and treatment of injuries
  - 6.2 Children with allergies
  - 6.3 Parent/Carer responsibility
  - 6.4 Celtic FC Foundation's responsibility
7. PLANNING & ORGANISATION
  - 7.1 Adult to Child Ratios
  - 7.2 Collection by Parents or Carers
  - 7.3 Safe Use of Changing Facilities
  - 7.4 Transporting Children
8. TRAVEL

## 1. ANTI-BULLYING

Celtic FC Foundation is fully committed to safeguarding the wellbeing of all children who engage with it. Celtic FC Foundation recognise the information provided for children by 'Respectme', Scotland's Anti-Bullying Service: *"Children's wellbeing can be seriously impacted by bullying behaviour. Bullying can take some children's rights away from them. Bullying is both behaviour and impact, the impact on a person's capacity to feel in control of themselves. That is what is termed as their sense of 'agency'. Bullying can take place in the context of relationships; it is behaviour that can make people feel hurt, threatened, frightened and left out. The behaviour happens face to face and online."*

Bullying may be seen as particularly hurtful behaviour where it is difficult for those being bullied to defend themselves. It can be a 'one-off' occurrence or repeated over a period of time, and can take many forms, physically and emotionally, and can include actions, looks, messages, confrontations, physical interventions, as well as the fear of these. Children being bullied by adults, their peers and in some cases by members of their families. Bullying can be difficult to identify because it often happens away from others and those who are bullied often do not tell anyone. Bullying is not always deliberate. Bullying may be:

- Physical e.g. hitting, kicking (in some cases, this might constitute an assault).
- Verbal (including teasing) e.g. spreading rumours, threats or name-calling, ridicule or humiliation.
- Emotional e.g. isolating a child from the activities or social acceptance of the peer group.
- Cyber bullying e.g. sending insulting or offensive messages via social media, text or emails; posting images or upsetting information on social networking sites or forums etc.
- Using abusive or insulting behaviour in a manner which causes alarm or distress.
- Prejudice based bullying involves singling out children who are perceived as different due to, e.g. race, gender, sexual orientation, disability, children who are asylum seekers, looked after children, young carers, or for any other characteristic unique to that child.
- Having belongings stolen or damaged.
- Being targeted because of who the child is or who they are perceived to be.

Celtic FC Foundation will:

- Seek to prevent, reduce and respond effectively to bullying behaviour
- Highlight bullying based on prejudice and perceived differences
- Seek to understand the experiences and address the needs of children and young people who are bullied and those who bullying within a framework of respect, responsibility, resolution and support
- Create an environment where bullying behaviour is not tolerated and is responded to in the best interests of children and young people
- Adults are good role models for children and young people and cultivate an ethos where there is an anti-bullying culture
- Do not label children and young people as "victims" and "bullies"
- Respond to each incident individually and adopt different practices, if necessary, to find the most effective response
- Encourage children and young people to speak and share their concerns
- Take all signs and reports of bullying seriously
- Take action to make sure children and young people are safe
- Speak to those being bullied and those displaying bullying behaviour separately
- Address the needs of children who are bullied as well as those who bully within a framework of respect, responsibility, resolution and support.
- Respond to any concerns raised either in the experiences of children of poor practice / misconduct or abuse caused by an adult's bullying behaviour.
- Highlight bullying based on prejudice and perceived differences, to ensure our practices are effective in dealing with these issues.

- Regularly monitor and evaluate the implementation of this policy and guidelines and include children's views in this process.

At Celtic FC Foundation, bullying behaviour will not go unchallenged and unreported. We will:

- Listen to the child or young person
- Reassure the child or young person reporting the bullying behaviour that we can be trusted and will help them
- Explain what will happen next
- Provide specific advice on cases of online/electronic bullying e.g. report behaviour to the social media site, check their privacy setting, consider blocking the person who is making negative or offensive comments etc.
- Be clear that all bullying behaviour will be treated seriously whether it is online or in person
- Report any concerns to Head of Foundation and Safeguarding Manager
- Talk with the child or young person who is displaying bullying behaviour to get them to understand the consequences of their behaviour
- Identify the feelings that cause them to act this way and help them develop alternate ways of responding to these feelings
- Encourage and support them to change this behaviour
- Be sensitive and use good judgement when it comes to informing their parents/carers
- Aim to restore positive relationships
- Only consider imposing consequences to ensure the safety of children and young people e.g. exclusion from the team or a particular activity

**\*Note:** These guidelines have been informed and developed with support from *respectme*, their publication 'Bullying in Scotland 2014' and the Respect for All: National Approach to Anti-Bullying for Scotland's Children and Young People, Scottish Government 2017. Copyright remains with *respectme* and we acknowledge all and any material taken from [www.respectme.org.uk](http://www.respectme.org.uk).

## 2. RELATIONSHIPS

### 2.1 Positive Relationships

We expect our Staff and volunteers to develop positive relationships with the children and young people they work with, this would involve engaging with them in an appropriate and encouraging manner, for example

- Have fun and help them get the most out of their experience
- Support the children and young people to understand their rights
- Treat them with respect, dignity, sensitivity and fairness
- Listen to them
- Set clear boundaries
- Encourage them
- Give constructive feedback
- Challenge inappropriate behaviour

There are certain behaviours towards children and young people that would not be tolerated, including:

- Having favourites
- Spending excessive amounts of time alone with children and young people
- Making sexually suggestive comments to a child or young person, even in fun
- Forming intimate emotional, physical or sexual relationships with children and young people
- Having a child or young person to stay at their home where this is not part of a pre-existing family relationship or social relationship with other members of their family

## 2.2 Positions of Trust and Situational or Opportunistic Behaviour

The power and influence a member of staff or volunteer has over someone they are looking after cannot be underestimated. If there is an additional competitive aspect to the activity and the older person is responsible for the young person's success or failure, then the dependency of the younger member upon the older will be increased. It is therefore vital for everyone to recognise the responsibility they must exercise in ensuring that they do not abuse their position of trust. Genuine relationships do occur, however no intimate relationship should begin whilst the member of staff or volunteer is in a position of trust. Celtic FC Foundation acknowledges that intimate relationships between teenagers take place and often no harm comes from them. However, it is also acknowledged that children who suffer abuse can do so at the hands of other children. It must be understood that the notion of 'relationships of trust' applies as much to young people who have taken on a leadership role as it does to adults.

The Sexual Offences (Scotland) Act 2009 introduced an offence of abuse of trust applicable to "positions of trust" which involve looking after children and young people who are in full time education, detained under a court order, looked after in a hospital, children's home or other establishment providing social care or in foster care. While coaching is currently not included within this legislation, the principle applies within all positions of trust and all staff and volunteers who work with children and young people are expected to behave appropriately, including, but not limited to:

- Staff and volunteers must not form an intimate relationship with any child or young person for whom they are in a position of trust
- Staff and volunteers must not use the position of trust to abuse children and young people either physically, emotionally or sexually
- Staff and volunteers must report any concerns to Head of Foundation or Celtic FC's Safeguarding Manager if they have information that another staff or volunteers has abused this position of trust

Opportunistic abusive behaviour is when an adult takes advantage of the opportunity to misuse their position of trust to abuse a child or young person.

Situational abusive behaviour occurs when an adult takes advantage of the opportunity to misuse their position of trust to abuse a child or young person starts to develop an attraction as a consequence of working with the child or young person.

If someone suspects that someone is exhibiting opportunistic or situational behaviour must be reported to Head of Foundation and Celtic FC's Safeguarding Manager.

## 2.3 Grooming

*Grooming* is predatory behaviour and can involve not only gaining access to, and the trust of the child or young person but also others around the child, such as their parents and carers, coaches, staff and other children and young people.

The Protection of Children and Prevention of Sexual Offences (Scotland) Act 2005 addresses the predatory behaviour of those who "groom" children, with the aim of abusing them, by introducing an offence of "grooming". Therefore any member of staff or volunteer must report any suspicions or allegations of grooming to Head of Foundation or Celtic FC's Safeguarding Manager as outlined in the section 'Procedures for Responding to Concerns about the Conduct of Adult'.

## **2.4 Peer on Peer Abuse**

It is recognised that peer on peer abuse can occur in the work environment; the abuse can take the form of physical, emotional, and sexual abuse. If there any concerns or suspicions about such behaviours taking place, these must be reported immediately to the Head of Foundation or Celtic FC's Safeguarding Manager. All allegations of abuse are treated seriously, regardless of who is involved.

## **3. BEHAVIOURS**

From time to time members of staff and volunteers may be required to deal with challenging behaviour. These guidelines aim to promote safe working practices, which can help support children to manage their own behaviour. They suggest some strategies and sanctions which can be used and also identify unacceptable actions or interventions which must *never* be used.

These guidelines are based on the following principles:

- The wellbeing of the child is the paramount consideration.
- Children must never be subject to any form of treatment that is harmful, abusive, humiliating or degrading and should always be able to maintain their respect and dignity.
- No member of staff or volunteer should attempt to respond to behaviour by using techniques for which they have not been trained.
- A risk assessment should be completed for all activities, which takes into consideration the needs of all children involved in the activity.

### **3.1 Planning Activities**

Good coaching practice requires planning sessions around the group as a whole but also involves taking into consideration the needs of each individual player within that group. As part of a risk assessment, coaches should consider whether any members of the group have presented challenges in the past or are likely to present any difficulties in relation to the tasks involved, the other participants or the environment.

Where members of staff or volunteers identify any potential risks, strategies and control measures to manage those risks should be agreed in advance of the session. The risk assessment should also identify the appropriate number of adults required to safely manage and support the session, including being able to adequately respond to any inappropriate behaviour and to safeguard other members of the group and the members of staff or volunteers involved.

All those delivering activities to children should receive training on these guidelines and should be supported to address issues of behaviour through regular supervision.

### **3.2 Agreeing Acceptable and Unacceptable Behaviours**

Staff, volunteers, children and parents or carers should be involved in developing an agreed statement of what constitutes acceptable and unacceptable behaviour. They should also agree upon the range of sanctions which may be applied in response to unacceptable behaviour (e.g. dropped from the team for one game etc). This can be done at the start of the season, in advance of a trip away from home or as part of a welcome session.

Issues of behaviour and control should regularly be discussed with members of staff, volunteers, parents or carers and children in the context of rights and responsibilities. It is beneficial to ask children as a group to set out what

behaviour they find acceptable and unacceptable within their group or team. It is also helpful to ask them what the consequences of breaking the 'agreement' should be. Experience shows that they will tend to come up with a sensible and working 'agreement'. If and when such a list is compiled, every member of the group can be asked to sign it, as can new members as they join. It can then be beneficial to have a copy of the agreement visible for reference during the activity.

### **3.3 Managing Behaviour**

The Wellbeing of children and young people is the paramount consideration in all we do. No child or young person should ever be subjected to any form of treatment that is harmful, abusive, humiliating, or degrading. We strive to create the correct environment to allow children and young people to flourish, including:

- Acceptable behaviour and consequences to be developed and agreed with children and young people, their parents and carers, and staff and volunteers.
- All activities will be planned in advance and be subject to risk assessments
- The child or young person being listened to
- Using the name of the child when speaking them
- The child being asked appropriate questions
- The emotions and feelings of the child being recognised
- Separating the behaviour from the person
- Explaining if there is to be a consequence to their behaviour and why
- No member of staff or volunteer should respond to a child's behaviour using techniques for which they haven't been trained.
- Communication should be constructive
- Strong leadership

In dealing with children who display unacceptable behaviours, members of staff and volunteers might consider the following consequences:

- Time out - from the activity, group or individual work
- Making up - the act or process of making amends
- Behavioural reinforcement - rewards for good behaviour, consequences for negative behaviour
- Calming the situation - talking through with the child
- Increased supervision by members of staff or volunteers
- Use of individual 'contracts' or agreements for their future or continued participation
- Consequences and sanctions - e.g. for missing an activity

Adults and children shall never be permitted to use any of the following as a means of managing a child's behaviour:

- Physical punishment or the threat of such
- The withdrawal of communication with the child
- Being deprived of basic necessities, such as food, water or access to changing facilities or toilets
- Verbal intimidation, ridicule or humiliation
- Threatening the child or young person's place on the team
- Invading a child or young person's space, shouting, threatening, preaching, or arguing

Members of staff and volunteers should review the needs of any child who behaves in a disruptive or difficult manner, and reflect on their practices and discuss any issues with colleagues, the child or young person, and/or their parents and carers.

### **3.4 Physical Interventions and Contact**

The use of physical interventions should always be avoided unless it is absolutely necessary in order to prevent a child injuring themselves, injuring others or causing serious damage to property. All forms of physical intervention shall form part of a broader approach to the management of behaviour.

All forms of physical contact should be respectful, sensitive, reasonable, and appropriate. Physical contact as explanation for techniques should only be used in exceptional circumstances; staff and volunteers must explain to the child or young person what they are going to do. Children and young people should be encouraged to express their views on physical contact.

Members of Staff and volunteers must never initiate unnecessary physical contact, or engage in sexually provocative games, or engage in 'rough' physical contact. Physical contact must never involve contact with the child or young person's buttocks, genitals, or breasts.

Physical contact to prevent something happening should always be the result of conscious decision-making and not a reaction. Before physically intervening, the member of staff or volunteer should ask themselves, 'Is this the only option in order to manage the situation and ensure safety?'

*The following must always be considered:*

Any form of physical intervention should achieve an outcome that is in the best interests of the child whose behaviour is of immediate concern.

- Contact should be avoided with the buttocks, genitals and breasts. Members of staff or volunteers should never behave in a way which could be interpreted as sexual.
- Members of staff and volunteers should consider the circumstances and the risks associated with using physical intervention compared with the risk of not doing so.
- Physical intervention should be part of a conscious decision, and not a reaction.
- Physical interventions should achieve an outcome that is in the best interests of the child or young person
- The scale and nature of physical intervention must always be proportionate to the behaviour of the child and the nature of harm or damage they might cause.
- All forms of physical intervention should employ only a reasonable amount of force - the minimum force needed to avert injury to a person or serious damage to property – applied for the shortest period of time.
- Members of staff and volunteers should never use physical interventions which present an unreasonable risk to children or adults
- Members of staff and volunteers should never behave in a way which could be interpreted as sexual.
- Members of staff and volunteers must never use physical intervention as a form of punishment.

Any physical intervention used should be recorded as soon as possible after the incident by the member of staff or volunteer involved using the Concern Record Form or Tootoot reporting tool, then reported to and passed to the Head of Foundation or Celtic FC's Safeguarding Manager as soon as possible.

A timely de-brief for members of staff, volunteers, the child and parents or carers should always take place following an incident where physical intervention has been used. This should include ensuring that the physical and emotional wellbeing of those involved has been addressed and ongoing support offered where necessary. Members of staff and volunteers, children and parents or carers should be given an opportunity to talk about what happened in a calm and safe environment. There should also be a discussion with the child and parents or carers about the child's needs and continued safe participation in the group, team or activity.

All forms of physical contact should respect and be sensitive to the needs and wishes of the child and should take

place in a culture of dignity and respect for all children.

In the first instance, coaching techniques should be delivered by demonstration (either by the coach or a player who can display the technique being taught). Educational instruction should be clearly explained with a description of how it is proposed to handle or have contact with the child before doing so. This should be accompanied by asking if the child is comfortable. Manual support should be provided openly and must always be proportionate to the circumstances.

Where possible, the child's parents or carers should undertake any personal care. If it is necessary for a staff member or volunteer to help a child with personal tasks e.g. toileting or changing, the child and parents or carers should be encouraged to express a preference regarding the support and should be encouraged to speak out about any methods of support with which they are uncomfortable. Members of staff and volunteers should work with parents or carers and children to develop practiced routines for personal care so that parents or carers and children know what to expect. Members of staff and volunteers must not take responsibility for tasks in which they are not appropriately trained.

Good safe working practises dictates that those working with children do not take on the responsibility for tasks for which they are not appropriately trained e.g. manual assistance for a child with a physical disability.

### **3.5 Sexual Activity**

**Sexual activity between adults and children under the age of 16** is a criminal act and immediate action must be taken to report it to the Police.

## **4. CELEBRATION**

### **Safe use of images**

Photographs, films and video clips can be used to celebrate achievements and promote activities. The aim of these guidelines is not to curb such activity but to ensure that children are protected from those who would seek to take or manipulate photos and video footage in a way that harms children or places them at risk of harm, such as inappropriate use, adaption or copying of images online; inappropriate photographs or recorded images taken of children and young people; the identification of children and young people from photographs or videos, including the ability to locate children or young people, which places them at risk.

Celtic FC Foundation will take all reasonable steps to promote the safe use of photographing and filming at all events and activities which it is associated however Celtic FC Foundation has no power to prevent individuals photographing or filming in public places.

Celtic FC Foundation reserves the right at all times to prohibit the use of photography, film or video at any event or activity with which it is associated and in locations where Celtic FC has jurisdiction.

### **Consent**

Children and their parents or carers will be informed that they may, from time to time, be photographed or filmed whilst participating. This could be for one of the following reasons:

- Media coverage of an event or achievement
- Promotional purposes e.g. website or publication

Written consent must be obtained from the child's parents or carers for children under 16 years old before any

photography or filming takes place. Such consent can be captured by the relevant Celtic FC Foundation Consent Form. This process will also be used for any accredited or professional photographers.

Special care must be taken in relation to vulnerable children e.g. child fleeing domestic violence or with a disability, and consideration given to whether publication or use of the photographs/film would place the child at risk.

### **Sharing of Images and Information**

- In the event that a professional photographer is being used, children and young people, and their parents and carers will be informed.
- No unsupervised access or one-to-one photography or filming sessions will be allowed unless this has been explicitly agreed with the child and parents or carers.
- No photographing or filming will be permitted in changing areas or bathrooms.
- All photographic/videoing equipment, including Mobile phones, must be switched off prior to going into and in changing areas.
- All images and accompanying information will ensure minimal personal details are shared publicly.
- When seeking to create action images try to focus on the activity rather than the individual.
- When seeking celebration images try to take group images rather than individual images.
- Ensure all those featured are appropriately dressed (minimum of shirt and shorts).
- Celtic FC Foundation will ensure that all negatives, copies of videos and digital photograph files are stored in a secure place. These will not be kept for any longer than is necessary, having regard to the purposes for which they were taken.
- Images will not be shared online, via social media or with external agencies unless express permission is obtained from the child and parents or carers.
- Consent should be given before any images are shared with external agencies.
- If at any time the use of an image or information attached to it appears inappropriate, report the misuse of the image to Head of Foundation or Celtic FC's Safeguarding Manager.

### **Taking of images**

- If required participants, parents or carers and Celtic FC Foundation staff must sign to agree that they will follow and enforce these guidelines.
- For promotional, marketing or social networking use of images for Celtic FC Foundation and or Celtic Football Club's publications or online, Celtic FC Foundation and Club support staff/volunteers will use Celtic FC Foundation or Celtic FC equipment only.

### **Project delivery/Events**

- Ensure that, prior to any activity where U18's are likely to be photographed or filmed, consents and permissions have been exchanged from young person and their parents or carers. Where consent is not provided for individual children, appropriate steps must be taken to ensure their image is not taken or used.
- Any photography or videos taken should be restricted to immediate family members for private, non-commercial purposes and not put online on any personal social media or online platforms.
- External agencies need permission from Celtic FC Foundation to take any images during the match/event or associated activities.
- Information about the rights and responsibility of Celtic FC Foundation in respect of photography and filming at project delivery/ events e.g. Celtic FC Foundation will take all reasonable steps to promote safe use of photography and filming, however the Foundation does not have the power to prevent photography and filming in public places

- The Foundation does have the right to prohibit the use of photography or filming in locations where Celtic Football Club has jurisdiction
- Information about the right to take photographs on public land – e.g. the Foundation cannot prohibit the taking of appropriate photographs or videos in a public area however, concerns about inappropriate filming or photography should be reported to the Head of Foundation, the Safeguarding Manager or the police, if the behaviour causes serious concern about a possible child protection issue

### **Storage and Retention of Images and Videos**

- Celtic FC Foundation will ensure that all negatives, copies of videos and digital photograph files are stored in a secure manner. These will not be kept for any longer than is necessary having regard to the purposes for which they were taken.

### **Misuse of an Image**

If at any time the use of an image or information attached to it appears inappropriate, report the misuse of an image to Head of Foundation or Celtic FC's Safeguarding Manager.

### **Concerns**

Anyone behaving in a way which could reasonably be viewed as inappropriate in relation to filming or photographing should be reported to the person in charge on the day and Head of Foundation or Celtic FC's Safeguarding Manager.

Where appropriate, concerns should also be reported to the Police.

## **5. COMMUNICATION AND SOCIAL MEDIA**

There are various ways in which we can communicate using ICT (Information Communication Technology) and social media. Technology advances extremely quickly, meaning ways in which we communicate, receive and absorb information are changing all the time.

Our website hosts a range of information, photographs and videos which are available for all members of the public. However, misuse of ICT and social media can also put children at considerable risk. As identified within Risks to Children's Wellbeing there are some adults who seek to harm children and have been known to use messaging or areas online to "groom" children.

For children the safeguarding risks of these technologies include:

- Discreet filming.
- The easy access most people have to a mobile phone.
- Inappropriate access to, use or sharing of personal details (e.g. names, email addresses).
- Unwanted contact from adults or other children or young people.
- Access to inappropriate websites or inappropriate content.
- Unwanted contact with children by adults with wrongful/questionable intent.
- Receiving, sending, or sharing offensive or otherwise inappropriate material, images, or comments.
- Online bullying.
- Grooming for sexual abuse.
- Direct contact and abuse.

For adults, risks involved include:

- Their communication with children being misinterpreted.
- Potential investigation (internal or by statutory agencies).
- Potential disciplinary action.

### **Texts and email**

Members of staff and volunteers must consider whether it is necessary to communicate with children via text and email, Head of Foundation needs to provide written approval before any contact can be made. Only if written approval is provided, the general principle is that all communications with children should be open, transparent and appropriate. Good practice would include agreeing with children and parents or carers what kind of information will be communicated directly to children by email or text message. In the first instance parent/carer consent must be obtained for all children under 16 years. If the child is over the age of 13 years, their written consent should also be obtained.

Contact should always be made at the phone number/email address the parent/carer has provided on the child's behalf. Parents or carers should be offered the option to be copied in to any messages their child will be sent. Although consent is not legally required for young people aged 16 and 17 years, it is still recommended that parents or carers are informed of the intention to send their children emails or texts. It is also good practice to obtain the consent of the 16 and 17 year old.

The following good practice is therefore required:

- All phone numbers/email addresses of children should be kept secure and confidential.
- The number of people with access to children's details should be kept to a practical minimum.
- Messages should never contain any offensive, abusive or inappropriate language. They should not be open to misinterpretation.
- Use group texts/chat/emails where possible.
- Include more than one member of staff or volunteer in the chat.
- If possible, include the child or young person's parent or carer.
- Any communication should be related to Foundation activities only.
- One to One contact online should be avoided, unless in exceptional circumstances.
- Avoid having conversations of a personal nature with children and young and don't have personal jokes.
- Do not use language that is racist, sexist, homophobic, derogatory, threatening, abusive, or sexual in tone.

### **Internet/websites**

Celtic FC Foundation may post information, photographs and videos on our website which is available to all members of the public. In terms of publishing anything that includes a child, the following good practice should be followed:

- Posts must never include personal information about the child or young person
- Posts must never portray children or young people in a demeaning, tasteless or provocative manner
- Children and young people must be appropriately dressed in the images
- Photographs or videos of children and young people attending public games may be used for commercial purposes

## **Permission**

- Written parent/carer consent must be obtained for any child aged under 16 years old before publishing any information, photographs or videos of a child. If the material is to be changed after consent has been given, the parents/carers must be informed and consent provided for the changes.
- Special care must be taken in relation to vulnerable children e.g. child fleeing domestic violence or a child with a disability, and consideration given to whether publication would place the child at risk.

## **Use of Images and Information**

- Information published on the websites/social networking sites must never include personal information that could identify a child e.g. home address, email address, telephone number of a child. All contact must be directed to the Foundation.
- Children must never be portrayed in a demeaning, tasteless or a provocative manner.
- Children and young people must be appropriately dressed in the images.
- Information about specific events or meetings e.g. coaching sessions, must not be distributed to any individuals other than to those directly concerned.

## **Concerns**

- Any concerns or enquiries about publications or the website should be reported to Head of Foundation or Celtic's Safeguarding Manager.

## **Sharing of images online from mobile phone cameras/videos**

- There have already been a number of cases where children have been placed at risk as a result of the ability to discreetly record and send images through mobile phones. There is also scope for humiliation and embarrassment if films or images are shared on websites such as YouTube or Facebook. The use of mobile phones in this way can be very difficult to monitor.
- The guidelines for Photographs, Film and Video should be observed in relation to the use of mobile phones as cameras/videos. Particular care is required in areas where personal privacy is important e.g. changing rooms and bathrooms. No photographs or video footage should ever be permitted in such areas.

## **Best Practice**

- Staff and volunteers must not become friends, follow or tag children and young people for whom they are in a position of authority or trust.
- Staff and volunteers must not communicate with children and young people via personal accounts or send private messages or messages of a personal nature.
- Staff and volunteers must not become involved in any debates concerning selection, performance or personalities.
- Passwords, pins and logins should be kept secure and not shared. Staff and volunteers should sign out of their social media profiles if logged on to a shared device.
- Information for staff and volunteers on action they should take if contacted directly by a child or young person e.g. discourage child or young person from contacting them directly, notify the Head of Foundation or Celtic's Safeguarding Manager.

Offensive or inappropriate comments, messages or images should be immediately removed and reported to the Head of Foundation or Celtic FC's Safeguarding Manager.

## **YOUTH PRODUCED SEXUAL IMAGERY (SEXTING)**

### **Handling incidents of youth produced sexual imagery**

This guidance only covers the sharing of sexual imagery by young people. Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other organisations to respond to. It also presents a range of risks which need careful management.

On this basis the following advice introduces the phrase ‘youth produced sexual imagery’ and uses this instead of ‘sexting.’ This is to ensure clarity about the concerns this guidance addresses.

‘Youth produced sexual imagery’ best describes the practice because:

- ‘Youth produced’ includes young people sharing images that they, or another young person, have created of themselves.
- ‘Imagery’ covers both still photos and moving videos.

### **Initial response**

When an incident involving youth produced sexual imagery comes to Celtic FC Foundation’s attention:

- The incident should be referred to the Head of Foundation or Celtic FC’s Safeguarding Manager as soon as possible.
- The Head of Foundation or Celtic FC’s Safeguarding Manager should hold an initial review meeting with appropriate staff.
- There should be subsequent interviews with the young people involved (if appropriate).
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to social services and/or the police immediately.
- See “Responding to Concerns about the Wellbeing of a Child”.

### **Disclosure**

Disclosures about youth produced sexual imagery can happen in a variety of ways. The young person affected may inform a member of staff, the Safeguarding Manager, a welfare officer or any member of Celtic FC Foundation’s staff. They may report through an existing reporting structure, or a friend or parent may inform someone at Celtic FC Foundation or inform Police Scotland directly.

All members of staff should be made aware of how to recognise and refer any disclosures of incidents involving youth produced sexual imagery. This should be covered within staff training.

Any direct disclosure by a young person should be taken very seriously. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure to a member of staff is a last resort and they may have already tried to resolve the issue themselves.

The decision to respond to the incident without involving the police or social services would be made in cases when the Head of Foundation and/or Celtic FC’s Safeguarding Manager is confident that they have enough information to assess the risks to children involved and the risks can be managed within the Foundation’s disciplinary framework and, if appropriate, local network of support.

The decision should be made by the Safeguarding Manager with input from the Head of Foundation and from other members of staff (such as Celtic FC's HR department) if appropriate. The decision should be in line with Celtic FC Foundation's child protection policies and procedures and should be based on consideration of the rights and best interests of the young people involved.

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for Celtic FC Foundation to manage the incident directly in conjunction with the child's school, where applicable. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to police and/or social services.

If you have any doubts about whether to involve other agencies, you should make a referral to the police.

### **Reporting incidents to the police**

If it is necessary to refer to the police, contact should be made through the Head of Foundation or Celtic FC's Safeguarding Manager. Once a report is made to the police, the report has to be recorded and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

### **Social services contact and referrals**

If the Head of Foundation or Celtic FC's Safeguarding Manager is aware that social services are currently involved with a young person affected by an incident of youth produced sexual imagery then they will contact social services.

### **Deletion of images**

If the Foundation has decided that other agencies do not need to be involved, then consideration should be given to deleting imagery from devices and online services to limit any further sharing of the imagery. If during a search a member of staff finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they should alert the Head of Foundation or Celtic FC's Safeguarding Manager who can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of Celtic FC Foundation discipline. They can also decide whether the material is of such seriousness that the police need to be involved. However, just as in most circumstances it is not recommended that those identifying the incident view the imagery, it is recommended that they should not search through devices and delete imagery unless there is good and clear reason to do so.

It is recommended that in most cases young people are asked to delete imagery themselves and to confirm that they have deleted the imagery. The young people should be given a deadline for deletion across all devices, online storage or social media sites.

### **Recording incidents**

All incidents relating to youth produced sexual imagery need to be recorded by Celtic FC's Safeguarding Manager, whether they have been referred to external agencies or not. In addition, where the Foundation does not refer incidents to police or social services they should record their reason for not doing so and ensure that this is signed off by the Head of Foundation.

## **6. HEALTH**

### **6.1 First Aid and the Treatment of Injuries**

All members of staff and volunteers must ensure:

- Where practicable all parents or carers of children under the age of 16 will complete an annual Celtic FC Foundation Consent Form.
- Ensure that all consent forms are up to date.
- Ensure consent forms are stored in a confidential manner and only accessed by those who need the information.
- There is an accessible and well-stocked first aid kit at the venue.
- Ensure correct storage of medication.
- They are aware of any pre-existing medical conditions, medicines being taken by participants or existing injuries and treatment required.
- Only those with a current, recognised First Aid qualification treat injuries. In more serious cases assistance should be obtained from a medically qualified professional as soon as possible.
- Treatment should be administered in an open environment.
- In order to preserve the dignity of a child or young person, treatment may need to be administered in a private room; if this occurs then their parent or carer (or another appropriate adult) must be present.
- Parents and carers must be informed of any injury and of the actions taken.
- Staff or volunteer must accompany the child or young person to hospital if their parent or carer is not in attendance.
- Physio treatment should only be administered by a qualified and registered physiotherapist.
- Only administer medication to a child or young person in an emergency.
- A Concern Recording Form should be completed if a child sustains a significant injury, along with the details of any treatment given. Common sense should be applied when determining which injuries are significant. The completed form should be passed to the Head of Foundation.
- A child's parents or carers are informed of any injury and action taken as soon as possible.
- The circumstances in which any accidents occur are reviewed to avoid future repetitions.

### **6.2 Children with Allergies and/or Pre-Existing Medical Condition**

Celtic FC Foundation is committed to being inclusive and to provide opportunities for children of all abilities and regardless of any medical conditions, disabilities or allergies which they may have. These guidelines focus on how members of staff and volunteers should respond to children with allergies, as they have a responsibility to ensure their wellbeing whilst they are attending an activity. However, it is equally important that children with medical conditions or allergies are not unnecessarily excluded from taking part in activities with their peers and that reasonable steps are taken to accommodate their individual needs.

Staff and volunteers will be made aware of any necessary information relating to allergies and/or pre-existing medical conditions, and of any change in circumstances relating to same.

### 6.3 Parent/Carer Responsibility

When a child joins an activity, parents or carers should:

- Ensure they complete the Consent Form and also take the time to talk to the member of staff or volunteer about the specific needs of their child and how to address and, as far as possible, accommodate these needs.
- Update the member of staff or volunteer of any change in circumstances.
- Consider a medic alert bracelet/watch for their child.
- Check the expiry date of adrenaline injectors and any medication regularly. An out-of-date injector may offer some protection, but this will be limited.
- If the child has a 'rescue pack', ensure that, if necessary, this is given to the member of staff or volunteer. This may include antihistamines for mild reactions, possibly an inhaler, and they may have two adrenaline injectors for more serious reactions e.g. anaphylaxis.

### 6.4 Celtic FC Foundation's Responsibility

Members of staff and volunteers should:

- Ensure the Consent Form for all children attending the activity are available and up to date together with full details of the child's allergies.
- Have a copy of the child's care plan for allergies and individual risk assessment.
- Communicate with parent/carers and child directly.
- Appropriately share the information with all others involved in the activity that need to be aware.
- Remember that the Consent Forms should always be stored confidentially but be accessible to members of staff and volunteers.
- Ensure correct storage and administration of medication.
- Record incidents or concerns and pass to the Head of Foundation or Celtic FC's Safeguarding Manager.
- Have their mobile phones charged and check they have a signal to allow calls to be made.
- Plan for additional supervision depending on the child's circumstances and environment.

## 7. PLANNING & ORGANISATION

### 7.1 Adult to Child Ratios

As a general guide, the following adult to child ratios are recommended:

Age 2 to 3 years:	1:5
Age 4 to 7 years:	1:8
Children 8 years and over:	1:10

All activities should be planned to involve at least two adults. The following factors will also be taken into consideration in deciding how many adults are required to safely supervise children:

- The nature of the activity.
- The number of children involved in the activity.
- The age, maturity and experience of the children.
- Whether any of the members of staff, volunteers or children have a learning or physical disability or special requirements.
- Whether any of the children have challenging behaviour.

- The particular hazards associated with the activity.
- The particular hazards associated with the environment.
- The level of qualification and experience of the members of staff and volunteers.
- The programme of activities.

As part of the planning of all activities, a risk assessment will be carried out by appropriate staff and volunteers.

## **7.2 Collection by Parents**

On some occasions, parents or carers can be late when picking their child up at the end of an activity. It is not the responsibility of the Foundation to transport children home on behalf of parents or carers who have been delayed.

It is therefore important for the guidelines below to be followed:

- It is clear that while the activity is running, members of staff and volunteers have a duty of care to the children that are in their charge. This is a principle of good practice.
  - When the activity has finished, obligations that we have under guidance, good practice and legislation still remain. We still have care and control of the child in the absence of a parent, carer or other responsible adult.
1. Make sure that Celtic FC Foundation communications:
    - Are clear about start and finishing times of the activity.
    - Are clear about the expectations of parents or carers not to drop children off too early and collect children promptly when the activity finishes.
    - Ask parents or carers whether they give consent for children to go home unaccompanied.
    - Have a late collection telephone contact and number on the Consent Form.
  2. Where possible make sure that there is more than one member of staff or volunteer present at the end of the activity.
  3. If a young person is to travel to and/or from the activity alone, then parents or carers should advise a member of staff or volunteer in advance.
  4. Members of staff and volunteers should know how to deal with being left alone with a child. Put preventative measures in place to avoid this happening whenever possible, and agree simple steps about how the situation should be dealt with if it arises. Remember the wellbeing and best interests of the child are paramount and have to take precedence, so leaving children alone is not an option.
  5. Members of staff and volunteers should have access to a record of the child's address, contact telephone number and an alternative phone number e.g. of a grandparent or other responsible adult. Staff/volunteers need this information to contact the adult responsible for the child and ask them to collect the child. If a member of staff is unable to contact anyone then a decision needs to be made on whether to take the child home or call the Police.
  6. If you are left alone with a child then transparency is key. Keep a record of your actions (use the guidelines in Transporting Children) and make sure you inform the Safeguarding Manager and parents/carers as soon as possible.
  7. When all else fails call the police.

### **7.3 Safe use of Changing Facilities**

One of the areas where children are particularly vulnerable is the changing room. Limited changing facilities sometimes mean that people of all ages need to change and shower in close proximity.

To avoid possible misunderstandings and embarrassing situations, adults need to exercise care when in the changing room at the same time as children. However, bullying can be an issue where children are left unsupervised and a balance should be struck depending on the situation. In general it is better if one adult is not alone to supervise and extra vigilance may also be required if there is public access to the facility. If, in an emergency, a male has to enter a female changing area, or vice versa, another adult of the opposite gender should accompany him or her.

The following guidelines should be followed:

- Adults should avoid changing or showering at the same time as children.
- It is recommended that particular attention is given to the supervision of children aged 10 and under in changing rooms. It is advisable for adults not to be alone with any such child under these circumstances.
- If children are uncomfortable changing or showering in public, no pressure should be placed on them to do so.
- Parents and carers should be notified in advance if changing facilities are not available in order that they can make alternative arrangements.
- If children require assistance when changing, this should be done by their parents or carers.
- While some activities may be restricted to changing rooms for the purposes of team talks, if at all possible another area should be considered for this. If there are no other options, it is best practice to wait until all children are fully dressed.
- The use of mobile phones and photographic equipment is prohibited within areas where children and young people are changing or showering.

### **7.4 Transporting Children**

Where it is necessary to transport children, the following good practice is required:

1. Where parents or carers make arrangements for the transportation of children to and from the activity out with the knowledge of the Foundation, it will be the responsibility of the parents or carers to satisfy themselves about the appropriateness and safety of the arrangements.
2. Where the Foundation makes arrangements for the transportation of children this must be arranged using a pre-approved taxi firm. Staff are not permitted to transport children in their own vehicle unless written permission is provided by Head of Foundation.
3. Any staff or volunteers involved will undertake a risk assessment of the transportation required. This will include an assessment of the following areas:
  - Ensuring that all vehicles and drivers are correctly insured for the purpose.
  - Ensuring the driver has a valid and appropriate license for the vehicle being used.
  - All reasonable safety measures are available e.g. fitted, working seatbelts, booster seats where appropriate.
  - An appropriate ratio of adults to children.
  - Ensuring drivers have adequate breaks.
4. When transporting children, wherever possible they should be in the back seat of the car for health and safety reasons, and wearing seatbelts.

5. Where practicable and planned, written parent or carer consent will be requested. If members of staff or volunteers are required to transport children:
  - Agree a collection policy with parents or carers which will include a clear and shared understanding of arrangements for collection at the end of an activity.
  - Always tell another member of staff or volunteer that you are transporting a child, give details of the route and the anticipated length of the journey.
  - Take all reasonable safety measures e.g. children in the back seat, seatbelts worn.
  - Call ahead to inform the child's parents or carers that you are giving them a lift and inform them of when you expect to arrive.
  - Staff and volunteers must never travel alone with a child or young person. If it is required in an emergency situation, the member of staff or volunteers must inform another member of staff or volunteer and provide an estimated arrival time.
6. In the event that their child is being transported by a member of staff or volunteer, parents and carers should:
  - Provide up to date contact information.
  - Inform staff and volunteers who are travelling with their child of any issues the child may have, such as travel sickness.
  - Ask appropriate questions about pick up and drop off times, journey time, etc.
  - Make sure an appropriate adult is present when the child or young person is returned home.

## **8. TRAVEL & OUTINGS**

### **Risk Assessment**

Potential areas of risk should be identified at the planning stage through a thorough risk assessment, which should be recorded in writing. Risk assessments should identify potential hazards and determine what control measures exist. Staff and volunteers will be made aware of their roles and responsibilities for the duration of the trip. Additional safeguards should be put in place to manage the risks, where appropriate. Risk assessment should be an on-going process throughout the trip as groups can often find themselves in unexpected situations despite the best laid plans!

## **9. PREVENTION PLANNING**

Prevention planning is considering all the risks associated with running project/event activities and planning and managing the risks by putting in preventative measures to minimise them. Prevention Planning may take the form of various assessments but for day to day activities or one off events this will involve conducting a risk assessment as part of planning and organising the activity or event.

Members of staff and volunteers who provide activities for children and young people have a duty to undertake a risk assessment of the environment in which they are operating, the activity itself and the group to ensure that the group's requirements are met. Potential areas of risk should be identified at the planning stage and should be recorded in writing. Safeguards should then be put in place to manage the risks identified. Depending on the nature of the event, activity or trip the risk assessment may be an ongoing process as unexpected situations can arise.

### **What is a risk assessment?**

A risk assessment is an important step to ensure the safe delivery and involvement of everyone participating in activities, in any capacity e.g. as a participant, a member of staff, a spectator, a volunteer etc. Completing a risk assessment allows those running day to day events and projects to focus on the risks that really matter – the

ones with the potential to cause significant harm.

A risk assessment is simply a careful examination of what could cause harm to other people so that the risks are identified and an informed decision be made as to whether enough precautions have been taken or more should be done to prevent harm.

### **Why is a risk assessment necessary?**

The Policy Statement declares that the Foundation will act in the best interests of children and young people and promote children's rights, including the right to be protected from harm and abuse. To do this effectively, those working with children and young people must first be aware of the areas of risk and be able to adequately assess these risks. By doing this members of staff and volunteers will be:

- making sure children and young people are safe
- protecting members of staff and volunteers
- making sure that the Foundation complies with legislation
- reducing or removing liability

### **What does the law state?**

The United Nations Convention on the Rights of the Child (UNCRC) states that all children have the right to be protected from harm, abuse and exploitation at all times.[See back of handbook for more information]. Section 5 of the Children (Scotland) Act 1995 states that if you are 16 or over and have children in your care or control then you must do what is reasonable in all circumstances to safeguard their health, development and welfare.

## Carrying out a risk assessment

### *Step 1 - Identify potential risks*

Think about who or what might cause harm to children and/or young people taking part in the activity or event.

In preparation for an activity member of staff and volunteers must consider the following:

- What is the nature of the activity?
- Where will the activity be carried out?
- What are the potential risks?
- Who may be at risk?
- Will the group be mixed?
- What will the age range be?
- Are there special needs within the group?
- How do you control the risk?
- What actions need to be carried out to do this?
- What are the experience and qualification levels of the coaches and/or volunteers?
- Is a First aider present? A qualified First Aider with a First Aid kit must be present for all activities
- How will children be supervised? Children should be properly supervised at all times, always with a satisfactory ratio of coaches and volunteers to children

### *Step 2 – Identify who might be harmed and how*

When identifying who might be harmed and how try to be specific.

### *Step 3 – Evaluate the risks and decide on precautions*

Evaluating risks includes considering how likely it is that harm could occur and how serious would it be. This is often described as 'rating' risk. Risk should be evaluated for likelihood and impact and a risk rating given for each. An example of rating is:

<b>High:</b>	could occur quite easily	<b>High:</b>	could cause significant harm
<b>Medium:</b>	could occur sometimes	<b>Medium:</b>	could cause moderate harm
<b>Low:</b>	unlikely, although conceivable	<b>Low:</b>	could cause minimal harm

Once the risk has been evaluated a decision can be made on what action should be taken. It is up to the member of staff and/or volunteer as to what action should be taken and this will include understanding that the law expects the Foundation to do what is reasonable in all circumstances.

For each risk assessment a risk owner should be assigned. The risk owner will assess what current controls are in place to reduce the risk, what future actions must be done to reduce the risk and what else they need to do about the risk. The risk owner should consider the following:

1. Can we eliminate the risk altogether?
2. If yes, what do we need to achieve this?
3. If no, what can we do that will allow us to manage the risk so that it becomes an acceptable level of risk?
4. Who will manage this risk?

If the assessment of risk is that there is a high likelihood of occurring and a risk of significant harm and safeguards cannot be put in place to reduce the likelihood or harm then the activity should not go ahead.

#### *Step 4 – Record your findings and act on them*

It is helpful to record the result of your risk assessment. The benefits of recording are:

- It shows everyone involved that you take this seriously and that you value their involvement; and
- It will be helpful in the future when you look back to review what action is identified.

Keep it simple. If there are a number of actions required, tackle the important ones or those which are rated 'high' first. Agree timescales for addressing the other actions and who will be responsible.

#### *Step 5 – Monitor and review*

After the event/activity/trip review how it went:

- Were the controls effective?
- Were the actions effective?
- What can we learn?

Ask the children and/or young people who took part in the activity or event, their parents and carers and the member of staff and volunteers who were involved as to what would be realistic and work in practice for future activities and events. Where appropriate, children and young people should also be consulted at the planning stage as they may be able to highlight risks which have not been considered by the adults involved.

## **PROCEDURES**

### **Appointment and Selection:**

Celtic FC Foundation will take all reasonable steps to ensure that its staff and volunteers who are working with children and/or young people, have been recruited appropriately and that the individuals work in a way that reflect the Wellbeing and Protection Values – Inclusive, Approachable, Empowering and Accountable.

As part of this process, we aim to select the best possible candidate for the role. For those working in a role which is regulated work with children and young people, the Foundation will fulfil its legal duty under the Protection of Vulnerable Groups (Scotland) Act 2007 to ensure that individuals who are barred from regulated work with children are not engaged (either paid or unpaid) in regulated work with children and young people within the Foundation.

The following procedure will be completed for all staff and volunteers who will be working in a role which requires them to be in contact with children and young people.

### **1. Pre-application Information**

Individuals who are applying for a position with the Foundation will be provided with pre-application information for the positions available and will include:

- A role description outlining the roles and responsibilities of the position
- A person specification, stating qualifications or experience of working with children required

- An application form

## 2. Application Form

Applicants will be requested to complete an application form. The purpose of the application form is to obtain relevant details for the position and referee contact details.

## 3. Review Applications and Interviews / Recruitment Conversations

The Foundation will review application forms and consider which applicants to take forward. Successful applicants will be invited to a interview.

## 4. Offer of Position

Once a decision has been made to offer appointment, the applicant will be notified either in writing or verbally. The applicant will be given details of the position, any special requirements and any obligations e.g. agreement to the Child Wellbeing and Protection Policy, a probationary period and responsibilities of the role.

The applicant will be sent a Basic Disclosure form to complete and return, unless the role involves regulated work with the Foundation in which case they will require to be a member of the PVG Scheme.

### ***Regulated work with Children***

If the role involves regulated work with children and/or young people a PVG Scheme Membership form and self-declaration form will be sent out for the successful applicant to complete and return for processing.

It is recommended that the offer is formally accepted and agreed to in writing e.g. by the individual signing and dating their agreement on the offer letter and returning it to the Foundation. The applicant's appointment will only be confirmed when:

- Two references have been received, checked and accepted;
- Self-declaration form has been returned and approved; and
- PVG Scheme Record/Scheme Record Update has been received and accepted.

## 5. References

References will be sought for all staff and volunteers who, by virtue of their role, will be working with children and/or young people within the Foundation.

Two references will always be requested and thoroughly checked. Where possible, at least one of these references will be from an employer or a voluntary organisation where the position required working with children and/or young people. References from relatives will not be accepted. If the applicant has no experience of working with children or young people, specific training requirements may be agreed before their appointment commences.

## 6. Membership of the PVG Scheme

All staff and/or volunteers carrying out regulated work with children and young people within the Foundation must be a member of the PVG Scheme for regulated work with children.

### ***Suitability for position***

Should the Celtic FC's Safeguarding Manager receive any information via the self-declaration form and/or PVG scheme record that needs risk assessed, this will be carried out by the Club's Safeguarding Panel.

The Safeguarding Panel will consist of at least three members from the Foundation and Celtic Football Club, including a member of Celtic FC's safeguarding team and Human Resources Advisor. This risk assessment considers any criminal conviction(s) or other information that would be considered relevant to the role. The decision of the Safeguarding Panel is by majority. The outcome of the decision with the Safeguarding Panel then contributes to the final decision of the applicant's appointment as mentioned at point 4 above.

### ***Overseas Applicants***

Applicants from overseas being appointed to regulated work with children and/or young people within the Foundation are required to join the PVG Scheme. If the applicant is applying for a position of employment they must prove their 'right to work' in the UK and be asked to provide a police check from their relevant country where possible. For further information see <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>.

Where this is not possible, or in addition to the police check, the following information, where relevant to the position, will be requested:

- A statement from the governing body in the country of origin of the applicant and/or the country from which they are transferring in regard to their participation and suitability for the position.
- A statement from the international federation of the sport in regard to their participation and suitability for the position.

## **7. Induction and Training**

Staff and volunteers will receive an induction. This process should include clarification of the expectations, roles and responsibilities of the position and identify any training needs.

Newly appointed staff and volunteers should complete recommended training over an agreed period. This training will include an introduction to Child Wellbeing and Protection Policy. Further training, where the role works directly with children and young people, is then provided.

## **8. Probation**

Newly appointed members of staff will complete an agreed period of probation.

## **9. Review of ongoing suitability**

All members of staff and volunteers will have a performance review on a regular basis. Performance reviews should include an evaluation of progress and identification of training needs.

All individuals in regulated work for the Foundation will require to complete a self-declaration form on an annual basis and apply for a Scheme Record Update every three years. This ensures we are continually risk assessing members of staff and volunteers to keep children safe.

## **10. New vetting information**

If new vetting information becomes available through a self-declaration form or PVG scheme record updates, this will be considered through a risk assessment by Head of Foundation and Celtic FC's Safeguarding Panel. Should any risk be identified, it will then be necessary to follow Responding to Concerns Procedure.

## **11. Consideration for Children's List or Barred Individuals**

If Disclosure Scotland notify the Foundation via Celtic FC's Safeguarding Manager that a member of staff or

volunteer is being considered for listing, that individual will be suspended as a precaution, until the outcome of the case is determined. Suspension is not a form of disciplinary action and does not involve pre-judgment. In all cases of suspension, the best interests of the child will be the primary consideration.

If Disclosure Scotland inform Celtic FC's Safeguarding Manager that an individual is barred, that member of staff or volunteer will be removed from regulated work with children and/or young people immediately in line with the Protection of Vulnerable Groups (Scotland) Act 2007 section 5 duties for organisations.

## RESPONDING TO CONCERNS PROCEDURE



In all cases where there are concerns about a child or young person and/or the conduct of an adult which affects, or may affect, a child or young person, the best interests and wellbeing of the child or young person will be the paramount consideration.

The purpose of this Procedure is to safeguard and protect children and young people and to respond appropriately to any concerns ensuring they are dealt with in a timely, appropriate and proportionate manner. Following set of published procedures when dealing with concerns helps:

- To avoid those receiving information from engaging in subjective judgments
- Reassure those who report concerns that an appropriate course of action will ensue
- Support those charged with managing concerns by providing them with a step-by-step process to follow
- Safeguard the rights of those against whom complaints or allegations have been made

No staff or volunteer in receipt of information that causes concern about a child or young person or the conduct of an adult shall keep that information to themselves, or attempt to deal with the matter on their own. Instead in all cases the following procedure **must** be followed regardless of whether the concerns arise through the adult or child or young person's involvement in or from outside of the Foundation.

### REMEMBER:

**If you are concerned about the *immediate* safety of the child or young person:**

- 1. Take whatever action is required to ensure the child's immediate safety.**
- 2. Pass the information immediately to the police and seek their advice.**
- 3. Report the concern to the Head of Foundation or Celtic FC's Safeguarding Manager, advising that the matter has been reported to the police**

At any time if you have a concern about the wellbeing of a child or young person, or think you may have a concern, you can contact Head of Foundation or Celtic FC's Safeguarding Manager for advice and support.

## 1. EVERYONE'S RESPONSIBILITY

A concern may range from mild verbal bullying to physical or sexual abuse. All concerns will be responded to by Head of Foundation or Celtic FC's Safeguarding Manager. If a member of staff or volunteer has a concern it is NOT their responsibility to investigate BUT it is their responsibility to:

- Reassure the person making the report that they have done the right thing in raising the concern

- Listen openly and without judgement
- Record anything that is said
- Report the concern to the Head of Foundation or Celtic FC’s Safeguarding Manager
- If there is a concern about the immediate safety of the child or young person, take the necessary steps to ensure their safety and contact the police

Everyone has a responsibility to **recognise** a concern, to **record** the concern either on the Foundation’s CRM incident reporting log Protection Referral Form or in email format, and **report** the concern to the Head of Foundation or Celtic FC’s Safeguarding Manager.

**2. RECOGNISE**

Staff and volunteers may become aware of a concern in different ways. For example:

- Direct disclosure by the child or young person.
- Observation of the concern, such as a change in the behaviour, appearance or nature of the child or young person or the conduct of an adult.
- Information that is shared from another individual or organisation e.g. an incident observed by another child or young person or adult and reported to them

All concerns must be reported to the Head of Foundation or Celtic FC’s Safeguarding Manager on the day the concern arises or as soon as practically possible thereafter.

**What to do if a child or young person discloses abuse**

<b>DO:</b>	
<ul style="list-style-type: none"> <li>• Stay calm – ensure that the child or young person is safe and feels safe</li> <li>• Listen to the child or young person and take what they say seriously. Do not show disbelief. Show and tell them that you are taking what they say seriously</li> <li>• Reassure the child or young person that they are not to blame and were right to tell someone</li> <li>• Be aware of interpreting what a child or young person says, especially if they have learning or physical disabilities which affects their ability to communicate or English is not their first language</li> </ul>	<ul style="list-style-type: none"> <li>• Avoid projecting your own reactions onto the child or young person</li> <li>• Avoid asking any questions. If necessary only ask enough questions to gain basic information to establish the <i>possibility</i> that abuse may have occurred. Only use open-ended, non-leading questions e.g. What? When? Where? Who?</li> <li>• Do not assume that the experience was bad or painful - it may have been neutral or even pleasurable e.g. the child or young person may think that they are in a consenting relationship with the adult</li> <li>• Do not introduce personal information from either your own experiences or those of other children.</li> </ul>
<b>DON'T:</b>	
<ul style="list-style-type: none"> <li>• Panic</li> <li>• Show shock or distaste</li> <li>• Probe for more information than is offered</li> <li>• Speculate or make assumptions</li> <li>• Rush into actions that may be inappropriate</li> </ul>	<ul style="list-style-type: none"> <li>• Make negative comments about the person against whom the allegation has been made</li> <li>• Approach the individual against whom the allegation has been made</li> <li>• Make promises or agree to keep secrets and give a guarantee of confidentiality</li> </ul>

### 3. RECORD

Record keeping is of critical importance and all information should be recorded in line with the following:

DO:	DON'T:
<ul style="list-style-type: none"><li>• Make a written record of the information as soon as possible</li><li>• Make the record factual, accurate and legible</li></ul>	<ul style="list-style-type: none"><li>• Give your personal opinion, unless it is backed up by substantial evidence</li><li>• Use judgemental language</li></ul>
<ul style="list-style-type: none"><li>• If the concern arises from a disclosure from a child or young person using the child or young person's exact words, where possible</li><li>• Include dates, times, locations and contexts, if available, in which the concern occurred together with any other relevant information</li></ul>	<ul style="list-style-type: none"><li>• Write the record in a way that protects the reputation of the Association or the individual who the concern relates to – remain unbiased</li></ul>

Where the child or young person has made a direct disclosure, and when appropriate, it is important that the child or young person understands why we are recording their details. If a child/young person recognises that people can help and support, and that this is the purpose of their details being shared, they will be more included and informed of the processes.

### 4. REPORT

The Head of Foundation or Celtic FC's Safeguarding Manager can be contacted in a number of ways:

- Donna-Marie Henry Head of Foundation at [dmhenry@celticfc.co.uk](mailto:dmhenry@celticfc.co.uk) +44 (0) 141 551 4429
- Jane Maguire Head of Foundation at [janemaguire@celticfc.co.uk](mailto:janemaguire@celticfc.co.uk) +44 (0) 141 551 4262
- Celtic FC's Safeguarding Manager at [safeguarding@celticfc.co.uk](mailto:safeguarding@celticfc.co.uk)

*How to report the concern:*

- Report the concern as soon as possible. It is recommended that initial contact is made with the Head of Foundation or Celtic FC's Safeguarding Manager by telephone

#### **Do not delay in reporting the concern**

- By attempting to obtain information to complete all sections of the Foundation's CRM incident reporting log Protection Referral Form
- By waiting until you can complete the Foundation's CRM incident reporting log Protection Referral Form
- If you have been unable to contact the Head of Foundation or Celtic FC's Safeguarding Manager by telephone

If you are unable to access the Foundation's CRM incident reporting log Protection Referral Form, please contact the Head of Foundation or Celtic FC's Safeguarding Manager by telephone or email the information to the above address, if you are able to do so securely, in order to report the concern.

**If you are unsure whether the information you have should be a cause for concern advice and support can be sought at any time from the Head of Foundation or Celtic FC’s Safeguarding Manager by contacting them for advice and support.**

**This can be done in a confidential manner anonymising the details of the parties involved.**

If the Head of Foundation or Celtic FC’s Safeguarding Manager is not available and an immediate response is required the police and social work services must be contacted. They have a statutory responsibility for the protection of children and they may already hold other information about the child or young people. If the information is shared with the police or other agencies, record what information is shared and any advice given and actions taken. At the earliest opportunity thereafter the Head of Foundation or Celtic FC’s Safeguarding Manager should be informed.

### *Confidentiality*

To maintain confidentiality do not keep any electronic, printed or written versions of the information you have provided. The Head of Foundation and Celtic FC’s Safeguarding Manager will maintain a copy of the information in a secure and confidential manner.

### *Support*

The Foundation recognises that voicing concerns, suspicions or allegations of poor practice, misconduct or abuse can cause great concern and stress – particularly if it relates to a colleague, volunteer or child/parent who is known to you. However, sharing information about the wellbeing of a child or young person is paramount in order to prevent the child or young person from suffering harm or further harm. Any member of staff or volunteer whom, in good faith, discloses information related to a concern will receive full support from the Foundation and Celtic FC Safeguarding / HR department.

### *Concern about the conduct of the Head of Foundation or Celtic FC’s Safeguarding Manager*

Where the concern is about the Head of Foundation or Celtic FC’s Safeguarding Manager it must be reported to Celtic FC Foundation’s **Chief Executive** directly. In this situation, the **Chief Executive** will take on the role and responsibilities of the Head of Foundation or Celtic FC’s Safeguarding Manager as listed below:

## **5. RESPOND**

The following sets out the steps which will be taken by the Head of Foundation or Celtic FC’s Safeguarding Manager after the concern has been reported.

### **A. The process on receipt of a concern**

Once the concern has been reported Head of Foundation or Celtic FC’s Safeguarding Manager will:

- Establish the basic facts and conduct an initial assessment of the facts in order to determine the appropriate course of action. The appropriate course of action may differ depending on whether the concern is about the wellbeing of a child/young person or about the conduct of an adult.
- Decide who should be informed of the concern, this may include the child or young person, their parent/carer, or external agencies.

- Consult external agencies such as the police and social work services for advice at any time, if required. This is important because they may hold other important information which, when considered alongside the current concern, builds a significant picture of concern.

All subsequent actions taken by the Head of Foundation or Celtic FC's Safeguarding Manager shall be recorded, in the order in which they happen, and the records should be signed and dated.

## **B. Conducting the Initial Assessment**

The purpose of the initial assessment is to clarify the nature and context of the concerns. Every situation is unique so guidance cannot be prescriptive.

Where the concern relates to the conduct of an adult, pending the outcome of any investigation, precautionary suspension will be considered in all cases where there is significant concern about the conduct of a member of staff and volunteers towards children and/or young people. For further information on precautionary suspension see section 6 of this Procedure.

In all cases, the initial assessment may involve:

- Speaking to the member of staff or volunteer who raised the concern; and/or
- Speaking to other members of staff or volunteers who may have information related to the concern; and/or
- Speaking to the member of staff or volunteers whose conduct has been reported – this will be subject to the nature and seriousness of the situation and should not be done if the concern suggests that the conduct may be criminal behaviour; and/or
- If the concern involves a named child or young person it may be appropriate to speak to the child or young person. This should never been done in cases where there is a suggestion of criminal conduct without first seeking the advice of the police. If it is appropriate to speak to the child or young person all questions should be basic, open-ended, non-leading and asked *solely with a view to clarifying the basic facts*. When speaking to a child or young person another adult should always be present. It is recommended that this other adult is known to the child or young person and the meeting is pre-arranged so the child or young person will be aware that you are going to speak to them about a concern; and/or
- Speaking to other children and/or young people and/or other individuals to establish the basic facts. As above, all questions should be basic, open-ended, non-leading and asked *solely with a view to clarifying the basic facts*.

### ***Best practice advice***

**Questioning of children by those conducting an initial assessment should be avoided, if possible. If it is necessary to speak to the child in order to clarify the basic facts, best practice suggests that consent from the parent/carer be obtained unless obtaining that consent may place the child at risk.**

### *Views of the Child*

Children and young people have the right to say what they think in all matters affecting them and to have their views taken seriously (Article 12, UNCRC). This must be at the forefront of any concerns that are raised. The nature of the concern will impact on the decision as to whether it is appropriate to discuss the concern directly with the child or young person. The views of the child or young person must be considered based on the age and maturity.

An initial assessment of basic facts may require the need to ask a child or young person some basic, open-ended, non-leading questions solely for with a view to clarifying the basic facts. It may also be necessary to ask similar basic questions of other children and young people, or other appropriate individuals who may have information.

It will not always be appropriate to speak directly with the child or young person about the concern. Advice should be sought from the Head of Foundation or Celtic FC's Safeguarding Manager if there is any uncertainty about the appropriate course of action.

If the information indicates that a criminal offence has been committed against the child or young person it would not be appropriate to ask the child or young person questions about the incident or speak to them directly about the incident(s), unless it is a disclosure directly from the child. Interviewing children and young people about possible abuse or criminal offences is the sole remit of specially trained police officers and social workers.

**Where the concern about a child's wellbeing suggests they are in need of protection, the information must be passed on with or without their consent for the purposes of their protection. Allegations of abuse must always be taken seriously. No member of the Foundation shall investigate allegations of abuse or decide whether or not a child has been abused. False allegations are very rare. If a child says or indicates they are being abused or information is obtained which gives concern that a child is being abused, the information must be responded to on the same day in line with this procedure.**

#### *Fairness and natural justice*

In the event of an investigation into the conduct of a member of staff or volunteers all actions will be informed by the principles of natural justice:

- They will be made aware of the nature of concern; and
- They will be given an opportunity to put forward their case; and
- The Foundation will act in good faith, ensuring the matter is dealt with impartially and as quickly as possible in the circumstances.

### **C. Concluding the Initial Assessment**

Decisions reached on conclusion of the Initial Assessment may differ depending on whether the concern relates to the wellbeing of a child or young person or to the conduct of an adult. Sometimes, the concern may relate to both the wellbeing of a child and the conduct of an adult in which case two sets of conclusions should be reached.

#### ***A concern about the wellbeing of a child/young person***

At the end of the initial assessment one of the following conclusions should be reached:

- The facts do not substantiate the concern, therefore no further action will be taken
- The concern has been successfully addressed by the child or young person, their parent and/or Foundation staff or volunteers and no further action is needed
- The concern has not been successfully addressed and further support is needed for the child or young person
- Information should be shared with statutory services, for example Police Scotland or the Social Work Department due to the gravity of the concern
- Information should be shared with the child's Named Person, if applicable, for consideration

#### *Sharing Concerns with Parents/Carers*

The Foundation is committed to working in partnership with parents/carers whenever there are concerns about

a child or young person. Parents/carers have the primary responsibility for the safety and wellbeing of their children. Where concerns are raised about a child or young person this will be considered in line with the wellbeing indicators and *may* be discussed with parents/carers. For example, if a child seems withdrawn, he/she may have experienced an upset in the family, such as a parental separation, divorce or bereavement. Common sense is advised in these situations and the best interests of the child will be considered as to what is the best support them. Children and young people will be asked who they feel is suitable to be informed and when relevant, consent gained from the child or young person.

**Where there are concerns that the parents/carers may be responsible for or have knowledge of the abuse, sharing concerns with the parents/carers may place the child or young person at further risk. In such cases advice must always firstly be sought from the police/social work services or Named Person as to who informs the parents/carers.**

#### *Sharing Information with Police and statutory agencies*

Where the concern about a child or young person's wellbeing suggests that they are in need of protection or that a criminal offence has been committed against them the concern must be reported to the police and/or social work services. The police and local authority have a statutory duty of care for all children.

#### ***A concern about the conduct of an adult***

At the end of the initial assessment one of the following conclusions should be reached:

- The facts do not substantiate the concern, therefore no further action will be taken
- Information supports concern of poor practice
- Information supports concern of serious poor practice and/or misconduct
- Information supports concern of possible criminal behaviour

#### *Initial Assessment Supports concern of poor practice*

If the initial assessment supports a concern that the conduct of an adult amounts to poor practice, the Head of Foundation or Celtic FC's Safeguarding Manager will share the findings of the initial assessment with the relevant member of staff at the Foundation, who has responsibility for the staff or volunteer whose conduct has amounted to poor practice, who will respond in line the Foundation's procedures.

The Head of Foundation or Celtic FC's Safeguarding Manager will carry out any further investigation, as necessary and take appropriate action depending on the nature and seriousness of the conduct.

#### *Initial Assessment supports concern of poor practice and/or misconduct*

If the concern relates to the conduct of a member of staff or volunteer the Head of Foundation or Celtic FC's Safeguarding Manager will share the findings of the initial assessment with the relevant member of staff in the HR Department, if applicable, who will respond in line the Foundation's Disciplinary Procedures, or with the Manager at the Foundation who has responsibility for the staff or volunteer whose conducted has amounted to serious poor practice and/or misconduct.

#### *Initial Assessment supports concern of possible criminal behaviour*

Where the initial assessment of information gives reasonable cause to suspect an adult's behaviour has been a criminal offence, the Head of Foundation or Celtic FC's Safeguarding Manager will:

- report the concern to the police as soon as possible on the day the information is received, along with supporting information; and
- make a written record of the name of the police officer to whom the concerns were passed together with the crime reference number, time and date of the call, in case any follow up is required; and
- on request, provide the police with a copy of the Foundation's CRM incident reporting log Protection Referral Form; and
- following the advice of the police, inform the parents/carers of the child involved as soon as possible unless the police advice is not to do this; and
- if appropriate, share the information with the child's Named Person if there is any impact on a child's wellbeing caused by an adult's possible criminal behaviour unless the police advise not to do this.

Advice will firstly be obtained from the police about informing the member of staff or volunteer involved in the concerns. If the advice is to inform them, they will be told that information has been received which may suggest an allegation of abuse or possible criminal offence. As the matter will be *sub judice* (i.e. under judicial consideration) no details will be given unless advised by the police. All actions will ensure the best evidence is preserved for any criminal proceedings while at the same time safeguarding the rights of the member of staff and volunteer.

The Foundation will take all reasonable steps to support a member of staff or volunteer whom a concern has been raised about, as well as others who may be involved as witnesses.

Possible outcomes include one or more of the following:

- Police investigation – may involve a child protection investigation jointly by police and social work services
- Criminal proceedings
- Civil proceedings (by the child/family who raised the concern)
- Disciplinary Proceedings
- Referral to Disclosure Scotland, where the PVG criteria is met

### ***Referral to Disclosure Scotland under Protection of Vulnerable Groups (Scotland) Act 2007***

Depending on the nature of the concern and the action taken by the Foundation, there may be a requirement, in law, to notify Disclosure Scotland. The following will apply where the member of staff or volunteer is in regulated work with the Foundation and a member of the PVG scheme.

#### *Referring to Disclosure Scotland*

Celtic FC's Safeguarding Manager will refer to Disclosure Scotland the case of any member of staff or volunteer who (whether or not in the course of their role with the Foundation) has:

- harmed a child
- placed a child at risk of harm
- engaged in inappropriate conduct involving pornography
- engaged in inappropriate conduct of a sexual nature involving a child, or
- given inappropriate medical treatment to a child.

**AND** as a result the Foundation has taken or would have taken one of the following options:

1. The Foundation has dismissed the member of staff or volunteer; or
2. The member of staff or volunteer would have been dismissed as a result of the incident had they not resigned, retired or been made redundant; or
3. The Foundation has transferred the member of staff or volunteer to a position in the Foundation which is not regulated work with children; or
4. The member of staff or volunteer would have been dismissed or considered for dismissal where employment or volunteer role was not due to end at the expiry of a fixed term contract; or

5. The member of staff or volunteer would have been dismissed or considered for dismissal had the contract not expired.

The Foundation will also refer the case of a member of staff or volunteer where information becomes available after the member of staff or volunteer has:

- been dismissed by the Foundation; or
- resigned, retired or been made redundant; or
- been transferred to another position in the Foundation which is not regulated work with children.

### ***Information from Disclosure Scotland***

If Disclosure Scotland notifies Celtic FC's Safeguarding Manager that a member of staff or volunteer is being considered for listing that individual will be suspended as a precaution until the outcome of the case is determined. Precautionary suspension is not a form of disciplinary action and does not involve pre-judgment. In all cases of suspension the best interests and wellbeing of children and young people will be the paramount consideration.

If Disclosure Scotland informs Celtic FC's Safeguarding Manager that an individual is barred, that member of staff or volunteer will be removed permanently from regulated work with children immediately in line with the Protection of Vulnerable Groups (Scotland) Act 2007.

## **6. PRECAUTIONARY SUSPENSION**

Suspension is not a form of disciplinary action. The member of staff involved may be suspended whilst an investigation is carried out. Suspension will be carried out in accordance with the Foundation's Disciplinary Procedures.

## **7. CRIMINAL PROCEEDINGS**

An ongoing criminal investigation does not necessarily rule out disciplinary action by the Foundation or investigation by the Head of Foundation or Celtic FC's Safeguarding Manager. However, any action taken must not jeopardise the criminal investigation. Advice must be taken from the police on this. Sufficient information should be available to enable the Foundation to make a decision whether to go ahead with disciplinary action/response under this concerns procedure.

In any event, once criminal proceedings have concluded the Foundation will consider the matter and the outcomes in line with this procedure.

## **8. ALLEGATIONS OF NON-RECENT ABUSE**

The Foundation recognises that sharing personal experience of abuse can be difficult, challenging and sensitive. Therefore allegations of abuse may be made some time after the event e.g. an adult who was abused as a child by someone who is still currently working with children. These procedures will be followed in the event of an allegation of non-recent abuse, including the Foundation's responsibility to refer to Disclosure Scotland.

## 9. MEDIA

All media enquiries relating to concerns under this procedure must be referred to:

- Donna-Marie Henry Head of Foundation at [dmhenry@celticfc.co.uk](mailto:dmhenry@celticfc.co.uk) +44 (0) 141 551 4429
- Jane Maguire Head of Foundation at [janemaguire@celticfc.co.uk](mailto:janemaguire@celticfc.co.uk) +44 (0) 141 551 4262
- Celtic FC's Safeguarding Manager at [safeguarding@celticfc.co.uk](mailto:safeguarding@celticfc.co.uk)

### CASE REVIEW PROCEDURE

#### 1. PURPOSE OF CASE REVIEW

Case reviews take place to establish whether there are lessons to be learned about the ways in which a concern has been investigated and responded to. Reviewing a concern allows the Foundation to consider:

- How the Responding to Concerns Procedure was implemented; and
- The effectiveness of the Responding to Concerns Procedure; and
- Informing policy and improving practice with regards to wellbeing & protection matters.

#### 2. DECIDING TO CONDUCT A REVIEW

The Foundation will follow the criteria set out below when considering and establishing a case for review.

1. The harm or risk of harm to a child was high; and/or
2. Views expressed by those involved in the case have raised concern about the way it was handled; and/or
3. There was a clear failure of procedure in handling the case: and/or
4. The case attracted a significant amount of media interest; and/or
5. The case concerned an unusual practice or behaviour; and/or
6. The case took a significantly long period of time to resolve; and/or
7. The Board decides a review is appropriate.

A case deemed eligible for review may be a particular concern or matter or, in some cases, may be cumulative concerns.

From time to time the Foundation may, internally, take a sample of cases to review to ensure the level of service provided in case management is consistent and to highlight any learning to take forward into future cases.

#### 3. IDENTIFYING WHO UNDERTAKES THE REVIEW

The Foundation will appoint a case reviewer, this may be internal or external to the Foundation. The case reviewer, whether internal or external, will have expertise in the area of the concern. These skills may differ according to the circumstances of each case and the agreed role of the case reviewer.

##### *External Case Reviewer*

The following criteria will be considered when deciding whether the case review should be external to the Foundation.

- Was the risk of harm to the child high?
- Has the case has attracted a significant amount of media interest?
- Is there a lack of experience and knowledge internally regarding the nature of the case?

Where the answer has been **yes** to one or more of the criteria above, there is a presumption that an external case reviewer will be appointed by the Foundation. The Foundation continue to have an overview of the review and will set out clear expectations in respect of timescales (see section below), milestones in the process and deadlines for completion of reports but will not have any input into the findings or recommendation of the review.

Where an external reviewer is commissioned, consideration will be given to any formal contractual arrangements required, appropriate legal advice sought, which agencies will enter into the arrangements (if any) and a contract drawn up covering timescales, fees and confidentiality including data protection.

### ***Internal Case Reviewer***

Reviews may also be undertaken internally and a case reviewer will be appointed from within the Foundation or Celtic Football Club.

A case will not be reviewed by any individual who had an involvement in the concern or incident, either as a named individual or witness, in the matter of concern.

## **4. TIMESCALES FOR REVIEW**

It is desirable that the case review should be undertaken as speedily as feasible and all cases will aim to be reviewed within an eight week period from the point the case reviewer has been appointed and received all evidence and correspondence relating to the case.

Timescales will be open to change due to particular circumstances relating to each case. Where an extension is necessary a progress report and explanation for the extension must be submitted for approval to the Foundation's Chief Executive.

## **5. FIRST STEPS OF THE REVIEW**

After an individual has been identified, the Case Reviewer will give consideration where there may be some outstanding investigations or proceedings that are still ongoing. These considerations will be:

1. Is there a Police and/or social work protection investigation still ongoing?
2. Is there a criminal investigation by the police still ongoing?
3. Are there any related legal proceedings in relation to the case?

**If the answer to any of these questions is yes, the review cannot proceed until any of the above has concluded.**

## **6. OTHER CONSIDERATIONS**

If the review can proceed, the case reviewer will need to consider how people may feel about the case being reviewed and the possible impact this could have. These reviews are not in place to reopen concerns or reinvestigate them. All evidence and correspondence relating to the concern itself will be considered and only in exceptional circumstances will contact be made with those involved e.g. parents, children and witnesses for opinions or comment.

People may feel anxious about their actions being scrutinised but it should be made clear at the start of the review what it is set out to achieve to relieve any concerns, for example:

*“I’ve been asked by the Foundation to review how the organisation dealt with the concerns about XXXXX. This will consider how procedures were followed and whether appropriate action was taken to protect those involved. I understand that you were involved in this case but I would like to clarify that this review is in place to...”*

Throughout the case review, the case reviewer will make a record of the review and its findings. This may not be a lengthy report, although a full report may be appropriate in certain circumstances. Generally, any record of a review should contain the following information:

- The source of the concern.
- The nature of the concern.
- A chronology of events, individuals and organisations involved.
- Action taken.
- An analysis of the key issues or matters linked to the aims of the review.
- Any other relevant points or observations.
- Lessons to be learned and changes to be made.
- Recommendations.

## CASE REVIEW PROCEDURE

### 1. Establish the facts of the case, a chronology of events and the roles of those involved

Setting out the actual sequence of events will help the case reviewer to understand what happened, when, and who was involved; for example:

23 April 2024	Young person discloses physical abuse to their coach during a session
23 April 2024	Coach reports the matter to Head of Foundation who reports to Celtic FC’s Safeguarding Manager
24 April 2024	Advice sought by Safeguarding Manager from DC Smith at the Family Protection Unit, Police Scotland and the disclosure is reported to the police
25 April 2024	Celtic FC’s Safeguarding Manager speaks to Foundation coach and Head of Foundation about any appropriate support for the young person

### 2. Identify any issues of key questions relation to the aims of the review

The case reviewer should then be able to answer the questions contained in the specific remit of the review. If the case reviewer considers that a child or young person may still be at risk despite action taken during the case or as a result of failure to take appropriate action, they should be prepared to act.

**Any urgent issues should be addressed immediately without waiting for the conclusion of the review.**

### 3. Identify any other relevant points or observations

The case reviewer may identify issues which are worth exploring further. These may include:

<p><b><u>PROCEDURES</u></b></p> <ul style="list-style-type: none"> <li>◆ Were the relevant procedures followed?</li> <li>◆ If not, is there a reasonable explanation for this?</li> <li>◆ Were the timescales appropriate?</li> <li>◆ Do the current procedures provide adequate information about what to do?</li> <li>◆ If appropriate, was a referral made to Disclosure Scotland as required in law?</li> </ul>	<p><b><u>PEOPLE</u></b></p> <ul style="list-style-type: none"> <li>◆ Were the right people involved?</li> <li>◆ Were the views of the child/family obtained?</li> <li>◆ Were those involved aware of the procedures?</li> <li>◆ Had the people involved been trained?</li> <li>◆ Where appropriate, were external organisations involved; for example, the police or governing body of sport?</li> </ul>
<p><b><u>OUTCOMES</u></b></p> <ul style="list-style-type: none"> <li>◆ Was the outcome appropriate in the case?</li> <li>◆ If not, why not?</li> <li>◆ Is there a need to take further action in this case; for example, referring the case to police/social work?</li> <li>◆ Were the right people told the right things about the outcome?</li> </ul>	<p><b><u>RECORDING</u></b></p> <ul style="list-style-type: none"> <li>◆ Were records kept?</li> <li>◆ Is the quality of the information recorded satisfactory?</li> <li>◆ Can the forms be improved?</li> </ul>

*(This list is not exhaustive)*

### 4. Identify any lessons to be learned, changes needed and make recommendations

If the case reviewer has gone through the above table and can identify gaps or missed opportunities then this will inform the case reviewer's recommendations.

Recommendations may include things like changes to procedures, forms and/or the provision of training. It may be helpful for the case reviewer to prioritise the recommendations; for example, essential, desirable or helpful.

### 5. Responding to the Findings and Recommendations

Recommendations will be reported to the Chief Executive

The report should include the recommendations only and not any details about the case, in order to preserve the child or young person's privacy, as well as others involved. The Foundation will consider how to respond to the findings, any recommendations and how to advise/support any others on whose behalf it has conducted the review.

Where recommendations are to be followed, the Foundation will identify:

- the priorities;

- what action is required;
- who will take action to address the recommendations; and
- timescales for completion.

This information must be clearly communicated to those involved.

If it is decided not to follow any recommendations, this decision and the reasons shall be clearly recorded. The **Chief Executive** will consider whether this decision requires to be communicate further e.g. the Board of Trustees or any interested parties e.g. persons involved in concern or individual who conducted the case review.

**Remember that many of the details of the case will be confidential, so any information shared must be presented in a way that protects the anonymity and privacy of those involved.**

## **EXTRACT FROM THE UNITED NATIONS CONVENTION ON THE RIGHTS OF THE CHILD**

The United Nations Convention on the Rights of the Child is a human rights treaty which sets out the civil, political, economic, social, health and cultural rights of children. The Convention defines a child as any human being under the age of eighteen, unless the age of majority is attained earlier under national legislation.

Nations that ratify this convention are bound to it by international law. Compliance is monitored by the UN Committee on the Rights of the Child, which is composed of members from countries around the world.

The UN General Assembly adopted the Convention and opened it for signature on 20 November 1989 (the 30th anniversary of its Declaration of the Rights of the Child). It came into force on 2 September 1990, after it was ratified by the required number of nations. Currently, 196 countries are party to it, including every member of the United Nations except the United States.

The Convention has 54 articles in total. Articles 43–54 are about how adults and governments must work together to make sure all children can enjoy all their rights.

Below follows an extract from the Convention, summarising the Articles most relevant to the context and purpose of this Safeguarding Handbook:

### ARTICLE 2 (non-discrimination)

The Convention applies to every child without discrimination, whatever their ethnicity, gender, religion, language, abilities or any other status, whatever they think or say, whatever their family background.

### ARTICLE 3 (best interests of the child)

The best interests of the child must be a top priority in all decisions and actions that affect children.

### ARTICLE 12 (respect for the views of the child)

Every child has the right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously. This right applies at all times, for example during immigration proceedings, housing decisions or the child's day-to-day home life.

### ARTICLE 13 (freedom of expression)

Every child must be free to express their thoughts and opinions and to access all kinds of information, as long

as it is within the law.

**ARTICLE 14 (freedom of thought, belief and religion)**

Every child has the right to think and believe what they choose and also to practise their religion, as long as they are not stopping other people from enjoying their rights. Governments must respect the rights and responsibilities of parents to guide their child as they grow up.

**ARTICLE 15 (freedom of association)**

Every child has the right to meet with other children and to join groups and organisations, as long as this does not stop other people from enjoying their rights.

**ARTICLE 16 (right to privacy)**

Every child has the right to privacy. The law should protect the child's private, family and home life, including protecting children from unlawful attacks that harm their reputation.

**ARTICLE 19 (protection from violence, abuse and neglect)**

Governments must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their parents or anyone else who looks after them.

**ARTICLE 23 (children with a disability)**

A child with a disability has the right to live a full and decent life with dignity and, as far as possible, independence and to play an active part in the community.

**ARTICLE 27 (adequate standard of living)**

Every child has the right to a standard of living that is good enough to meet their physical and social needs and support their development.

**ARTICLE 28 (right to education)**

Every child has the right to an education. Primary education must be free and different forms of secondary education must be available to every child. Discipline in schools must respect children's dignity and their rights.

**ARTICLE 29 (goals of education)**

Education must develop every child's personality, talents and abilities to the full. It must encourage the child's respect for human rights, as well as respect for their parents, their own and other cultures, and the environment.

**ARTICLE 30 (children from minority or indigenous groups)**

Every child has the right to learn and use the language, customs and religion of their family, whether or not these are shared by the majority of the people in the country where they live.

**ARTICLE 31 (leisure, play and culture)**

Every child has the right to relax, play and take part in a wide range of cultural and artistic activities.

**ARTICLE 32 (child labour)**

Governments must protect children from economic exploitation and work that is dangerous or might harm their health, development or education. Governments must set a minimum age for children to work and ensure that work conditions are safe and appropriate.

**ARTICLE 34 (sexual exploitation)**

Governments must protect children from all forms of sexual abuse and exploitation.

**ARTICLE 35 (abduction, sale and trafficking)**

Governments must protect children from being abducted, sold or moved illegally to a different place in or outside their country for the purpose of exploitation.

ARTICLE 37 (inhumane treatment and detention)

Children must not be tortured, sentenced to the death penalty or suffer other cruel or degrading treatment or punishment. Children should be arrested, detained or imprisoned only as a last resort and for the shortest time possible. They must be treated with respect and care, and be able to keep in contact with their family. Children must not be put in prison with adults.

ARTICLE 39 (recovery from trauma and reintegration)

Children who have experienced neglect, abuse, exploitation, torture or who are victims of war must receive special support to help them recover their health, dignity, self-respect and social life.

ARTICLE 40 (juvenile justice)

A child accused or guilty of breaking the law must be treated with dignity and respect. They have the right to legal assistance and a fair trial that takes account of their age. Governments must set a minimum age for children to be tried in a criminal court and manage a justice system that enables children who have been in conflict with the law to reintegrate into society.

ARTICLE 41 (respect for higher national standards)

If a country has laws and standards that go further than the present Convention, then the country must keep these laws.

ARTICLE 42 (knowledge of rights)

Governments must actively work to make sure children and adults know about the Convention.

## Useful Telephone Numbers

Head of Foundation	Donna-Marie Henry	0141 551 4429
Head of Foundation	Jane Maguire	0141 551 4262
Safeguarding Manager		0141 551 4250
Police Scotland		101
Safeguarding in Sport		0141 418 5674
Children 1 <sup>st</sup>		0131 446 2300
Parentline		08000 28 22 33
Childline		0800 1111
Child Exploitation Online Protection		<a href="http://www.ceop.police.uk">www.ceop.police.uk</a>