



1. Policy Statement.

This policy is made in accordance with **Castlemilk Community Football Trust (CCFT)** aims and objectives.

CCFT shall work with **vulnerable adults and families** on a range of its projects and programmes and has a responsibility to promote the **wellbeing and safety** of all people it comes into contact with. **CCFT** is committed to practice that protects **children and vulnerable adults** from harm and recognises its duty to ensure that appropriate action is taken where a **child or vulnerable adult** is experiencing harm or is at risk of harm.

2. Purpose

- To safeguard and promote the **Wellbeing of the Children and Vulnerable Adults** with whom **CCFT** works.
- To ensure that all employees and others covered by this policy understand the context within which checking with the **Disclosure Scotland / PVG scheme** takes place.
- To provide all employees with guidance on how they should behave if they suspect that a **child or vulnerable adult** may be experiencing, or be at risk from abuse or harm.
- To guide employees on how to respond to, and report concerns.
- To ensure compatibility with other **CCFT** policies.

3. Who is Affected By This Policy?

This policy applies to all **paid employees, seconded staff, trustees, volunteers, mentors, students, agency workers, contract, and unpaid staff** working on behalf of **CCFT** in any capacity and in any setting. **Young members, young people on work experience and any children or young adults** involved in the work of **CCFT** should be made aware of **CCFT safeguarding policies and procedures**. Those with specific communication needs because of language or disability should have access to information in appropriate forms to ensure their understanding. This policy relates to all children from unborn up to 18 years of age and includes children with whom **CCFT** has direct or indirect contact with.

This policy also relates to **vulnerable adults** who need to be safeguarded from harm. In project proposals and tenders, **CCFT safeguarding policies** should be mentioned and attached where appropriate. Project information leaflets for **children and vulnerable, parent/carers and local agencies** should all have a statement on safeguarding with contact details as appropriate.

4. Definitions

As per the definitions set out in the **Children and Young People (Scotland) Act 2014**, a 'child' is anyone who has not yet reached their 18th birthday. It also includes unborn children. Adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations. An adult may be vulnerable if they:

- Have a learning or physical disability.
- Have a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs.
- Have a reduction in physical or mental capacity.
- Are in the receipt of any form of healthcare.
- Are detained in custody.
- Are receiving community services because of age, health or disability.
- Are living in sheltered or residential care home.
- Are unable, for any other reason, to protect themselves against significant harm or exploitation.

5. Legal Framework

Everyone has a right to be safeguarded from abuse or neglect. There is a legislative framework in place in place to safeguard **children and vulnerable adults** through **The Children and Young People (Scotland) Act 2014** (as amended by **section 53 of the Children Act 2004**) and the **Protection of Vulnerable Groups (Scotland) Act 2007**.

Further guidance that sets out the requirements and expectations on professionals to work together to effectively safeguard children include:

- **Working Together to Safeguard Children (2015).**
- **Safeguarding Disabled Children: Practice Guidance (2009).**
- **Getting it Right For Every Child (GIRFEC).**

CCFT does not have a statutory duty to comply with the key arrangements listed in '**Working Together**', however **CCFT** has in place arrangements that reflect the importance of **safeguarding** and **promoting** the **welfare of children**, as well as **vulnerable adults**.

6. General Principles

Safeguarding relates to the action taken to promote the **welfare of children and vulnerable adults** and to protect them from harm. All **staff** should have a basic awareness of **safeguarding** issues. This includes:

- Being alert to the possibility of abuse and neglect.
- Having enough knowledge to recognise an abusive or potentially abusive event or set of circumstances.
- Knowing who in the organisation to raise concerns with.
- Being competent to take the appropriate immediate or emergency action.

If any member of staff has any concerns about a child or vulnerable adult they must alert the **CCFT Wellbeing and Protection Officer (WPO)** immediately. If the **WPO** agrees there is grounds for concern, they must take appropriate action to safeguard the child or vulnerable adult. This may include contacting the relevant local authority social care service or the local police child abuse investigation team.

If a child or vulnerable adult is in immediate danger the member of staff who first becomes aware of the danger should dial **999** for the police.

The above may include concerns about a member of staff, a suspicion that a child or vulnerable adult is being abused or neglected, or a suspicion that an activity is taking place that could place a person at risk. If the concern relates to a member of staff, **CCFT WPO** should contact the **SFA Child Wellbeing and Protection Manager** responsible for providing advice and liaison in such cases. This is a general guide as the role of the **SFA Child Wellbeing and Protection Manager** and **local social work** is expected to change, additionally some **local authorities** will have **new multi-agency safeguarding arrangements**. In any situation where there is a suspicion of abuse, the welfare needs of the **child or vulnerable adult** must come first even where there may be a conflict of interest (e.g. where the suspected perpetrator may be a member of staff).

7. What Constitutes Abuse?

Abuse is a deliberate act of ill-treatment that can harm or is likely to harm a person's safety, wellbeing and development. Abuse can be physical, sexual or emotional. Abuse may not, however, fall easily into these categories and staff/associates are not expected to be experts in the field.

Neglect also constitutes abuse but can be defined as failing to provide or secure a child or vulnerable adult with the basic needs required for physical safety and wellbeing. **CCFT** recognises that a person's welfare is paramount and that all **children and vulnerable adults** - regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity - have the right to protection from all types of harm and abuse.

7.1. Categories Of Abuse

Children and vulnerable adults can experience abuse in a number of ways. Forms of abuse that may affect children and vulnerable adults include:

- Abuse of trust
- Child sexual exploitation
- Child Trafficking
- Discriminatory abuse
- Domestic violence or abuse
- Emotional Abuse
- Female Genital Mutilation (FGM)
- Financial or material abuse
- Grooming
- Harmful sexual behaviour
- Modern slavery
- Neglect
- Online abuse
- Organisational or institutional abuse
- Physical Abuse
- Psychological or emotional abuse
- Radicalisation of children or vulnerable adults
- Self-neglect
- Sexual Abuse

These categories can overlap, and an abused **child or vulnerable adult** often suffers more than one type of abuse.

Disabled children and young people are particularly **vulnerable** to abuse in any form. Safeguards for **disabled children** are essentially the same as for **non-disabled children**. Staff must maintain high standards of practice, remain vigilant to the possibility of a child being abused and minimise situations of risk. All staff must ensure that the children they work with know how to raise concerns and have access to interpreters/specialist workers and other aids to communication if required. Where there are concerns about the welfare of a disabled child, they should be acted upon in accordance with the procedures set out in this policy. The same thresholds for action apply. Where concerns are raised about a **child** who has communication difficulties, appropriate support, interpreting services and communication aids must be secured.

8. Procedures For Safeguarding Children And Vulnerable Adults

8.1. Organisation Duties And Responsibilities

- Raise awareness of the need to protect **children and vulnerable adults** and reduce risks to them
- Ensure that staff in contact with children and vulnerable adults have the requisite knowledge, skill and qualifications to carry out their jobs safely and effectively.
- Ensure safe practice when working in partnership with other organisations, in particular that they have in place adequate safeguarding arrangements, including appropriate policies and mechanisms to provide assurance on compliance.
- Maintain an organisation that is safe for all staff, **children and vulnerable adults** and an environment where poor practice is challenged.
- Ensure that all staff, associates, volunteers, young people and Board members who will be working with children and vulnerable adults consent to vetting through the **Disclosure Scotland / PVG scheme** where applicable.
- Ensure that when abuse is suspected or disclosed, it is clear what action must be taken.
- Ensure that the **Charity Manager, Trustees and the Wellbeing and Protection Officer (WPO)** are accountable for the effective implementation of this policy.
- Ensure that all staff receive copies of **safeguarding policies**, are trained in their meaning and application and understand their responsibilities.

These procedures are set within the wider context of **CCFT organisational policy** and practice, which promote **children and vulnerable adult's** interests across all aspects of their lives. All of **CCFT** work is underpinned by the values and principles that **CCFT** advocates.

8.2. Responsibilities Of The Wellbeing And Protection Officer

The **Wellbeing and Protection Officer (WPO)** is responsible for ensuring that safeguarding is given high priority within **CCFT**.

Specific responsibilities include:

- An awareness of the **Scottish FA Wellbeing & Protection policy & training** guide.
- Providing support and advice to **managers** and all **staff** on safeguarding matters related to **children and vulnerable adults**.
- Ensuring that all **members of staff** receive training on **child protection** and safeguarding as part of their induction, and on an ongoing basis where required.
- Managing referrals/cases reported and working with **Senior Management** to ensure resolutions.

- Carrying out referrals to the relevant authorities / **SFA Child Wellbeing and Protection Manager / Police Scotland** where abuse of a **child or vulnerable adult** is reported or suspected.
- Referring the matter to the relevant authorities / **SFA Child Wellbeing and Protection Manager / Police Scotland** where a member of **staff** is suspected of abuse.
- Maintaining an overview of **safeguarding issues** and monitoring the implementation of this policy, in conjunction with the **Chair Person**.

The **WPO** has responsibility for deciding whether to refer any reported matters onto the **police** or to the **local authority social care service**. Where possible, referrals should be made on the same working day and certainly within 24 hours. It is the responsibility of the **WPO** to decide whether the **parents/carers** (if applicable) of the **child or young person** should be informed of the referral.

8.3. Responsibilities Of The Chair Person

- Supporting the **WPO** in the above tasks.
- Auditing the operation of the **policy and procedures**.
- Implementing a **training strategy** for employees.
- Ensuring that the **policy and procedures** are implemented throughout the **organisation**.
- Ensuring that the organisation's **safeguarding policy** is reviewed annually.

8.4. Responsibilities Of Trustees

To comply with their legal duties, **trustees** must react responsibly to reports of **safeguarding** risks and incidents of abuse and take steps to make sure all staff know how to deal with these.

Trustees should report a serious incident to the **Office of the Scottish Charity Regulator (OSCR)** if:

- **Beneficiaries** have been, or are alleged to have been, abused or mistreated while under the care of **CCFT**, or by someone connected with **CCFT**, for example a **trustee, staff member or volunteer**.
- There has been an incident where someone has been abused or mistreated (alleged or actual) and this is connected with **CCFT** activities.
- There has been a breach of procedures or policies at **CCFT** which has put **beneficiaries** at risk, including a failure to carry out checks which would have identified that a person is disqualified under **safeguarding legislation**, from working with **children or adults**.

8.5. Responsibilities Of All Line Managers

Individual line managers are responsible for ensuring **staff** comply with the expectations set out within this **policy**.

Specific responsibilities include:

- Being the first point of contact for reports of concerns.
- Ensuring that all **employees and volunteers** in regulated roles are subject to **Disclosure Scotland PVG checks** where applicable.
- Reporting all concerns to the **WPO**. Providing advice and support to **employees** reporting disclosures or concerns working with the **WPO** to resolve issues.

8.6. Employee Responsibilities

All **CCFT** staff have a responsibility to ensure the safety of **children and vulnerable adults** with whom they work. It is the responsibility of **staff** to promote good practice and minimise and manage potential risks. All **staff, including volunteers, freelance staff and associates**, must be aware of the requirements within these procedures.

Action To Safeguard

CCFT staff have no powers to investigate abuse. Nonetheless all **CCFT** staff have a duty to **safeguard and promote the welfare of children and/or vulnerable adults** and a responsibility to work closely and cooperatively with other agencies in order to achieve this. **Staff** may have a role as referrers, witnesses or supporters in **safeguarding processes**.

If a member of **staff** suspects that a **child or vulnerable adult** is being harmed by experiencing, or already has experienced, abuse or neglect and/or is likely to suffer harm in the future, they must talk to the **WPO**. The **WPO** will agree next steps including making any necessary referrals. If anyone other than the **WPO** makes a referral, they should inform the **WPO** as soon as possible. It is not the responsibility of **CCFT** to decide whether or not abuse has taken place. It is the responsibility of **staff** at **CCFT** to act if there is cause for concern, in order that the appropriate agencies can investigate and take any action necessary to protect the **child and/or vulnerable adult**.

If a member of **staff** is concerned that a **child or vulnerable adult** is in immediate danger, or requires immediate medical treatment, they should call the **police** and/or **emergency medical services** on **999** straight away.

9. Staff Behaviour

9.1. Code Of Conduct

CCFT staff working with **children or vulnerable adults** may be required to undergo awareness training.

Staff should not:

- Meet with a **child or vulnerable adult** on their own.
- Ask overly personal questions, including those about age or appearance (unless specifically related to a work project, in which case it must be documented).
- Send or give out material that could be considered offensive, which includes material on social media sites.
- Suggest or imply a personal relationship could develop.
- Take an aggressive or bullying tone.
- Have physical contact.
- Offer or accept personal gifts.
- Travel alone with a **child or vulnerable adult**.

9.2. Website/Online Safety

Any project that provides service users with direct access to the Internet must have protocols in place to ensure safe use.

The Internet is a significant tool in the distribution of indecent photographs and some adults use the Internet to try to establish contact with **young and/or vulnerable people** to “groom” them for inappropriate or abusive relationships. **CCFT** would consider **staff** involvement in such activities as gross misconduct, which could ultimately lead to dismissal and referral for **police** investigation.

9.3. Presence On Websites And Social Media

Staff should take care when communicating with others online, particularly when identifying themselves as **CCFT staff members** and when in contact with **children and vulnerable adults**.

- Many websites contain offensive, obscene or indecent material such as:
- Sexually explicit images and related material
- Advocating of illegal activities
- Advocating intolerance for others.

Staff members authorised to use the Internet must not download pornographic or other unsuitable material on to **CCFT** equipment / sites or distribute such material to others. **CCFT** would consider this gross misconduct which could ultimately lead to dismissal and referral for police investigation. In addition, users must not place any material on to the Internet that would be considered inappropriate, offensive or disrespectful of others. Disciplinary action will be taken against **staff** that breach this policy.

Where this is done inadvertently, the user must escape from the website and/or delete the material immediately. They should also report the incident to their **line manager**, the **WPO** or **Charity Manager**. Breach of this will be treated as gross misconduct.

Where exemption is required, because of the nature of the work of the member of staff, permission must be given in advance by the line manager, Wellbeing and Protection Officer (WPO) and in consultation with the IT services provider. **Children and vulnerable adults** should not be given access to such websites.

9.5. Children Or Vulnerable Adults Obtaining Indecent Images Or 'sexting'

If a **child or vulnerable adult** reports to a **member of staff** that they have sent, or been sent, indecent images (sometimes referred to as 'sexting'), they should discuss the concern with the **WPO**.

- The **police** and **children's social care** should always be contacted if:
- Somebody involved is over the age of 18 or under the age of 13
- There are concerns about the ability to give consent
- The images are extreme or show violence
- The incident is intended to cause physical or emotional harm
- There is reason to believe that the **young person** has been blackmailed, coerced or groomed.

Details of the incident and the actions taken must be recorded in writing. **Staff** should avoid looking at the image, video or message in question. If it is on a device belonging to **CCFT**, it may need to be isolated so that nobody else can see it. This may involve blocking the network to all users.

10. confidentiality And Sharing Information

10.1. Confidentiality And The Possible Impact on The Child or Vulnerable Adult

In any work with **children or vulnerable adults** it is important to be clear about confidentiality. Confidentiality and safeguarding should be discussed with **children or vulnerable adults** at the beginning of any piece of work and reminders and information given from time to time, to ensure that they understand the processes and what responsibilities members of **staff** have. It is absolutely essential to be clear about the limits of confidentiality well before any such matter arises.

While personal information held by professionals and agencies is subject to a legal duty of confidence and should not normally be disclosed without the subject's consent, it is essential that **staff** respond quickly where they have concerns or suspicions of abuse. Any concerns about confidentiality should not override the rights of **children or vulnerable adults** at risk of, or suffering, harm. **CCFT** responsibility for protecting **children and vulnerable adults** means that, where necessary to protect welfare, it will breach confidentiality to raise concerns.

Information sharing must be done in a way that is compliant with the **General Data Protection Regulation and Data Protection Act 2018**, the **Human Rights Act 1998** and the common law duty of confidentiality. However, a concern for confidentiality must never be used as a justification for withholding information when it would be in the **child or vulnerable adult's** best interests to share information.

10.2. Do Not Promise To Keep Secrets

Should it become necessary to pass on information shared by another party this decision should always be discussed with the person in question and where possible their cooperation

sought beforehand. Explanations of the reasons; processes; likely sequence of events; and who to contact for information or for support should also be provided.

When a child or vulnerable adult makes an allegation of abuse they may hope that the abuse will stop without further enquiries. They may fear the effect this will have on their family and may fear retribution from the abuser. They should be helped to understand why the referral (to the Wellbeing and Protection Officer (WPO)) must be made and what is likely to happen as a result. It is important to reassure the child or vulnerable adult but he/she must not be told that their allegation will be treated in a particular way or that the information will be kept a secret.

A record should be kept of any decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

10.3. Confidential Record Keeping

Even if a concern has been discussed with a line manager/ the WPO, it is important that all concerns are properly recorded in writing whether or not further action is taken. **CCFT** has a standard **Safeguarding & Child Protection Report Form** for recording suspected abuse to help people record relevant information. This form must be used for all concerns and passed as soon as possible to the **WPO**.

It is important that concerns raised are recorded accurately and in detail. All discussions should end with clear and explicit recorded agreement about who will be taking what action. Where no further action is the outcome the reason for this should be clearly recorded.

Some of the information requested by the form may not be available. **Staff** should not pursue the questioning of the **child or vulnerable adult** for this information if it is not given freely. There should be no delay in reporting the matter by waiting for all the information.

In completing the form it is important not to write speculative comments but to stick to the facts. **Staff's** opinion may be crucial but it should be recorded as an opinion and any evidence stated to support these opinions. Records pertaining to issues of **child protection** may be accessible to third parties such as **Children's Services, Police, the Courts** and **Solicitors**.

Records must be kept securely in a locked place or file to which access is restricted. **Managers** have a particular responsibility in maintaining the confidentiality of these records and must ensure that the records, or any information they contain, are made available only to relevant parties. The transfer of information - verbally, through the mail, electronically, etc. - should be done in such a way that confidentiality is maintained.

10.4. On And Off Site Activities

A Risk Assessment should be carried out at least 48 hours before any activity involving a **child or vulnerable adult** takes place. **Safeguarding** and **Code of Conduct** procedures apply whether the activity is on or off-site.

11. Safe Recruitment

11.1. Recruiting Staff

The **Protection of Freedoms Act 2012** under the **Protection of Vulnerable Groups (Scotland) Act 2007** sets out that it is an offence for an employer to knowingly employ someone in a regulated position if they are barred from doing so. Where there is regular contact but not 'regulated' i.e. supervised it is still possible to consider an enhanced criminal records check but this will not include a check of the barred list through the **Disclosure Scotland / PVG scheme**. You must seek advice from the **Charity Manager**. More details can be found in our **Recruitment Policy**.

12.2. Freelance Staff And Associates

It is the responsibility of the **Charity Manager** to ensure that these **staff** are familiar with this document and agree to work within this framework. If there are any concerns with the conduct of **freelance staff** or **associates**, these concerns must be raised following the steps outlined in this policy.

13. Contact Details

If you suspect that a **child or vulnerable adult** needs protection or is at risk of abuse, please contact **CCFT WPO**, contact details of the **Officer** will be on display and available to all **staff** and **volunteers**

CCFT WPO (Graham Simpson) (07736804853) (wpo@ccftrust.co.uk)

(childrenswellbeing@scottishfa.co.uk)

13.1 NSPCC Child Protection Helpline (24 hours)

To report or discuss concerns about a child's welfare. Tel: **0808 800 5000** or textphone: **0800 056 0566** or email: **help@nspcc.org.uk**

13.2 Child Exploitation And Online Protection Command (ceop)

Report a concern that a child is being sexually abused or groomed online at **www.ceop.police.uk**

14. Further Information And Guidance

This policy should be read in conjunction with **Castlemilk Community Football Trust** range of policies and procedures and will form a significant part of the induction process for **Trustees, staff, coaches and volunteers**.

The following legislation is relevant to this policy, either because it has influenced its introduction and/or its content:

- **Counter-Terrorism and Security Act 2015**
- **Data Protection Act 2018**
- **Equality Act 2010**
- **Female Genital Mutilation Act 2003**
- **Health and Safety at Work Act 1974**
- **Human Rights Act 1998**
- **Management of Health and Safety at Work Regulations 1999**
- **Protection of Children Act 1999**
- **Protection of Freedoms Act 2012**
- **Rehabilitation of Offenders Act 1974**
- **Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975**
- **Protection of Vulnerable Groups (Scotland) Act 2007**
- **Sexual Offences Act 2003**
- **The Children and Young People (Scotland) Act 2014, 2004**
- **The Police Act 1997**

Policy Owner

The **Children and Vulnerable Adults Safeguarding Policy** is owned by **CCFT**. It will be annually reviewed and updated to ensure compliance with relevant legislation and internal change.