



SSF CHILD WELLBEING, PROTECTION & SAFEGUARDING POLICY AND GUIDANCE

OUR VISION

A Scotland where young people can harness the power of sport to overcome adversity and unlock their full potential.

OUR MISSION

To empower young people to use sport to build the strength and confidence they need to combat poverty, trauma and adversity.



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1. DEFINITION AND PURPOSE

The safeguarding and protection of children and young people's physical, emotional, psychological and social wellbeing is the highest priority for Scottish Sports Futures (SSF).

This policy sets out SSF's approach to:

- promoting children's wellbeing and rights;
- preventing abuse, neglect, exploitation and harm;
- recognising and responding to concerns;
- creating safe, inclusive and trusted environments;
- listening to children and young people and taking their views seriously;
- responding to disclosures and allegations;
- supporting children and young people following concerns or traumatic experiences;
- recruiting, training and supervising staff and volunteers safely;
- working appropriately with parents, carers, partner organisations and statutory services; and
- ensuring that safeguarding is embedded throughout SSF's governance, leadership and delivery.

SSF's approach is informed by Getting it Right for Every Child (GIRFEC), the United Nations Convention on the Rights of the Child (UNCRC), the National Guidance for Child Protection in Scotland and trauma-informed practice.

SSF recognises that safeguarding is everyone's responsibility.

For the purposes of this policy, a child or young person is anyone under 18 years of age. All children and young people have the right to participate in SSF activities in an environment that is safe, inclusive, respectful, accessible and free from abuse, discrimination and avoidable harm.

2.SCOPE

This policy applies to:

- all SSF employees;
- tutors and sessional workers;
- volunteers;
- trustees and Board members where relevant to their role;
- students and placements;
- contractors and consultants;
- anyone representing SSF;
- anyone involved in delivering SSF programmes or activities; and
- partner organisations where safeguarding responsibilities are specified through an agreement or commissioning arrangement.

Safeguarding is everyone's responsibility.

All staff, tutors and volunteers must comply with this policy and the SSF Code of Conduct, Code of Practice, relevant risk assessments, safeguarding procedures and other associated policies.

SSF will:

- 1.respect and promote children's rights, wishes and feelings;
- 2.create environments in which children feel safe and able to speak about worries;
- 3.prevent harm wherever reasonably possible;
- 4.respond promptly and proportionately to concerns;
- 5.ensure children are listened to and involved in decisions affecting them;
- 6.recruit and supervise staff safely;
- 7.provide appropriate safeguarding and trauma-informed training;
- 8.maintain clear reporting and recording arrangements;
- 9.work collaboratively with parents, carers, partner organisations and statutory agencies;
- 10.learn from incidents, concerns and complaints; and
- 11.review this policy regularly.

3. CHILDREN'S RIGHTS

SSF recognises children and young people as rights holders, not simply recipients of services.

SSF will promote the rights contained in the UNCRC and ensure that children's rights are reflected in everyday practice, decision-making and safeguarding.

The UNCRC (Incorporation) (Scotland) Act 2024 received Royal Assent on 16 January 2024, with the relevant Part 3 provisions coming into force on 16 July 2024.

SSF will use the UNCRC as a framework for practice, including the following core principles:

Non-discrimination – Article 2

Every child has rights without discrimination. SSF will actively challenge discrimination and barriers relating to, for example:

- disability;
- sex;
- gender reassignment;
- race;
- ethnicity;
- nationality;
- religion or belief;
- sexual orientation;
- socio-economic circumstances;
- care experience;
- pregnancy and maternity;
- family circumstances; or
- any other protected or personal characteristic.

Best interests – Article 3

The best interests of the child will be a primary consideration in decisions affecting them.

3. CHILDREN'S RIGHTS

Right to life, survival and development – Article 6

SSF will promote children's physical, emotional, psychological and social development and take reasonable steps to protect children from foreseeable harm.

Right to be heard – Article 12

Children have the right to express their views freely in matters affecting them and for those views to be given appropriate weight according to their age and maturity.

SSF will therefore:

- listen to children;
- provide accessible ways to express views;
- explain decisions in language children can understand;
- record and act upon children's views;
- provide additional support where communication needs exist; and
- avoid assuming that adults automatically know what is best for a child.

Right to privacy – Article 16

Children's privacy, dignity and personal information will be respected. Information will only be collected, used and shared appropriately and lawfully.

Protection from violence, abuse and neglect – Article 19

SSF will take all appropriate measures to protect children from physical or mental violence, injury, abuse, neglect, maltreatment and exploitation.

Right to health – Article 24

SSF will promote children's health and wellbeing and respond appropriately where health concerns affect a child's safety or ability to participate.

Right to rest, leisure, play and recreation – Article 31

SSF recognises the importance of sport, physical activity, play, recreation and participation to children's wellbeing and development.

3. CHILDREN'S RIGHTS

The National Guidance for Child Protection in Scotland confirms that all children and young people have the right to protection from abuse and neglect.

Rights in practice

Children's rights will be embedded through:

- child-friendly information;
- participation and co-production;
- accessible complaints and feedback processes;
- individualised support and safety planning;
- consideration of the child's communication needs;
- appropriate advocacy and support;
- privacy and dignity;
- proportional responses;
- non-discriminatory practice; and
- regular engagement with children about whether they feel safe.

4. GETTING IT RIGHT FOR EVERY CHILD (GIRFEC)

SSF adopts the GIRFEC approach as a framework for supporting children and young people.

SSF will consider the child's individual circumstances and wellbeing and, where appropriate, the SHANARRI wellbeing indicators:

- Safe
- Healthy
- Achieving
- Nurtured
- Active
- Respected
- Responsible
- Included

Safeguarding decisions will consider both immediate protection from harm and the child's wider wellbeing.

5. PRINCIPLES OF SAFEGUARDING

SSF adopts the following principles.

Empowerment

Children are at the centre of decisions affecting them. Their voice will be listened to, respected and acted upon wherever possible.

Prevention

SSF will seek to identify and reduce risks before harm occurs.

Proportionality

Responses will be proportionate to the level of concern and risk and will use the least intrusive response consistent with protecting the child.

Protection

Children experiencing, or at increased risk of, harm will receive appropriate protection and support.

Partnership

SSF will work collaboratively with children, parents/carers, partner organisations and statutory services.

Accountability

Everyone working for or on behalf of SSF must understand their safeguarding responsibilities and know how to report a concern.

Inclusion and equality

Safeguarding arrangements will recognise that some children may experience additional barriers or increased vulnerability to harm.

Relationship-based practice

Safe, consistent and respectful relationships are fundamental to children's wellbeing and protection.

6. TRAUMA-INFORMED PRACTICE

SSF recognises that trauma is everyone's business and that many children and young people may have experienced adversity, loss, abuse, neglect, exploitation, violence, discrimination, instability or other experiences that affect how they respond to people and environments.

SSF recognises trauma as a core consideration and identifies safety, relationships, choice, collaboration, trust and empowerment as key principles.

SSF will develop this approach further.

Being trauma-informed means:

- recognising that trauma and adversity are common;
- understanding that trauma can affect behaviour, relationships, communication, learning, emotional regulation and physical wellbeing;
- recognising the individual nature of trauma;
- avoiding assumptions or labels about behaviour;
- responding with compassion and curiosity;
- promoting safety and predictability;
- providing appropriate choice and control;
- building trusting relationships;
- collaborating with children and young people;
- recognising strengths and resilience;
- avoiding unnecessary re-traumatisation; and
- supporting recovery.

SSF will apply the following five principles:

Safety

We will create environments where children experience physical and emotional safety rather than threat.

Choice

Wherever practicable, children will be offered meaningful choices rather than unnecessary control.

6. TRAUMA-INFORMED PRACTICE

Collaboration

We will work with children rather than simply doing things to or for them.

Trust

Adults will behave consistently, transparently and reliably and maintain appropriate professional boundaries.

Empowerment

Children will be supported to recognise their strengths, skills, choices and capacity to influence what happens to them.

Trauma-informed safeguarding responses

When a child discloses a concern, staff should:

- remain calm;
- listen;
- avoid judgement;
- allow the child to communicate at their own pace;
- avoid unnecessary questioning;
- explain what will happen next;
- avoid making promises that cannot be kept;
- avoid asking the child to repeat their account unnecessarily;
- prioritise immediate safety;
- record accurately; and
- pass the concern to the appropriate safeguarding lead and statutory agency where required.

SSF recognises that trauma-informed practice does not replace child protection procedures. Where there is a child protection concern, safeguarding action must still be taken.

7. DUTY OF CARE

SSF staff, tutors and volunteers have a legal and professional duty to take reasonable steps to safeguard children and young people in their care.

The duty of care begins when responsibility for a child is accepted for an SSF activity and continues for the duration of that responsibility.

SSF will take reasonable steps to:

- provide safe environments;
- identify and manage risks;
- maintain appropriate staff-to-child ratios;
- use appropriate supervision;
- respond to safeguarding concerns;
- provide appropriate first aid arrangements;
- maintain appropriate emergency arrangements; and
- provide appropriate follow-up and support.

SSF recognises that its duty of care extends beyond the immediate activity where concerns about a child's safety or wellbeing arise.

8. SAFER RECRUITMENT, PVG AND SUITABILITY

SSF is committed to safer recruitment.

Recruitment processes will include, as appropriate:

- application forms;
- role descriptions;
- safeguarding responsibilities;
- interviews;
- references;
- identity verification;
- relevant qualification checks;
- appropriate PVG membership;
- consideration of previous safeguarding concerns;
- induction; and
- ongoing supervision and training.

PVG

The Disclosure (Scotland) Act 2020 significantly changed the Scottish disclosure system.

From 1 April 2025, PVG scheme membership became a legal requirement for individuals carrying out a regulated role with children and/or protected adults, and organisations must ensure appropriate PVG arrangements before a regulated role is undertaken.

SSF will therefore assess every relevant role against the current definition of a regulated role.

FIVE-YEAR PVG MEMBERSHIP

From 1 April 2026, PVG membership moved from the previous lifetime model to a five-year membership model for new applications, with renewal required every five years. Existing members are being transitioned to the new arrangements in phases.

SSF will:

- ensure regulated roles are correctly identified;
- obtain appropriate PVG membership before regulated activity begins;
- maintain accurate PVG records;
- monitor renewal requirements;
- ensure staff notify relevant changes where required;
- notify Disclosure Scotland when a PVG member ceases to carry out a regulated role where required; and
- follow current Disclosure Scotland guidance.

PVG membership is an important safeguarding measure but does not replace safer recruitment, supervision, professional judgement or ongoing safeguarding training.

9. TRAINING, SUPERVISION AND SUPPORT

All staff and volunteers must receive safeguarding information appropriate to their role. Staff in regulated roles will receive appropriate Child Wellbeing and Protection in Sport (CWPS) training and other safeguarding training relevant to their responsibilities. Training will include, as appropriate:

- recognising abuse and neglect;
- responding to disclosures;
- child exploitation;
- harmful sexual behaviour;
- online safety;
- professional boundaries;
- trauma-informed practice;
- children's rights;
- equality and inclusion;
- information sharing;
- low level concern training
- allegations against staff;
- safer recruitment; and
- recognising the impact of trauma on staff.

Safeguarding knowledge will be refreshed regularly.

SSF will also provide appropriate supervision, debriefing and support following significant incidents.

10. RISK ASSESSMENT AND SAFETY PLANNING

Every SSF programme/session will be appropriately risk assessed before delivery.

Risk assessments will consider:

- physical safety;
- environmental risks;
- staffing;
- supervision;
- transport;
- individual vulnerabilities;
- medical needs;
- communication needs;
- behavioural and emotional needs;
- safeguarding risks;
- online/digital risks;
- excursions and residential activity;
- emergency arrangements; and
- risks associated with specific children or young people.
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Where a child presents with an identified individual risk, SSF will consider an individualised safety plan.

Risk assessments and safety plans will be reviewed when circumstances change.

11. RESPONDING TO CONCERNS AND DISCLOSURES

A safeguarding concern may arise from:

- something a child says;
- something a child does;
- something an adult observes;
- a third-party report;
- an allegation;
- a pattern of behaviour;
- information from another organisation; or
- information received online.

SSF categorises concerns as appropriate, including:

1. Behavioural concern/"niggle";
2. Wellbeing concern; or
3. Child protection concern.

However, staff must not delay reporting because they are uncertain about which category applies.

SSF may categorise concerns as a Behaviour Niggle/Low-Level Concern, Wellbeing Concern or Child Protection Concern. These categories are intended to support appropriate response and escalation and must not prevent a concern being escalated where new information or professional judgement indicates increased risk.

11. RESPONDING TO CONCERNS AND DISCLOSURES

If a child discloses

Staff should:

1. Stay calm.
2. Ensure the child feels safe.
3. Listen carefully.
4. Allow the child to speak at their own pace.
5. Use the child's own language where possible.
6. Avoid leading or probing questions.
7. Never promise confidentiality or secrecy.
8. Explain that information may need to be shared to keep them safe.
9. Thank the child for telling you.
10. Reassure them that they have done the right thing.
11. Explain what will happen next.
12. Take immediate action if the child is at risk.
13. Record the concern accurately.
14. Report it immediately through SSF's safeguarding process.

The existing SSF procedure correctly requires factual recording, avoiding investigation or leading questions and escalating child protection concerns promptly.

Staff must not:

- dismiss a concern;
- panic or show shock;
- express disbelief;
- ask probing or leading questions;
- investigate the allegation themselves;
- confront an alleged perpetrator;
- promise secrecy;
- share information unnecessarily;
- delay reporting; or discuss the concern with other children.

12. CHILD PROTECTION CONCERNS

Where there is reasonable concern that a child may be at risk of significant harm, SSF will act immediately in accordance with the National Guidance for Child Protection in Scotland and local child protection procedures.

Depending on circumstances, this may require contacting:

- Police Scotland;
- local authority social work / social work emergency services;
- the child's existing professional network;
- the SSF Child Protection and Safeguarding Manager; or
- another appropriate statutory service.

In an emergency, where a child is in immediate danger, emergency services should be contacted without delay.

SSF will not conduct its own investigation where this could interfere with statutory child protection processes.

The National Guidance for Child Protection in Scotland 2021, updated in 2023, sets out national responsibilities and expectations for protecting children and responding to concerns.

13. LOW-LEVEL CONCERNS

SSF recognises that safeguarding concerns do not always meet the threshold for a child protection concern or an allegation of abuse. A concern about the behaviour, conduct or practice of an adult may nevertheless indicate that professional boundaries are being crossed, that practice is not consistent with SSF's expectations, or that there may be a developing risk to children and young people.

SSF therefore operates a Low-Level Concerns (LLC) Policy, which must be read alongside this Child Wellbeing, Protection and Safeguarding Policy.

The SSF Low-Level Concerns Policy provides the detailed procedure for identifying, recording, reporting, assessing, managing and reviewing low-level concerns.

13.1 WHAT IS A LOW-LEVEL CONCERN?

A low-level concern is any concern, information or observation about the behaviour of an adult working for or on behalf of SSF towards a child or young person that:

- does not meet the threshold for a child protection concern or allegation of abuse;
- does not appear to indicate that an adult poses a significant risk of harm to a child;
- may nevertheless be inconsistent with SSF's Code of Conduct, Code of Practice, safeguarding expectations or professional boundaries; or
- causes a person to have a concern about the appropriateness of an adult's behaviour, even where they are unsure whether the behaviour represents a safeguarding breach.

13.1 WHAT IS A LOW-LEVEL CONCERN?

A low-level concern may relate to a single incident or to a pattern of behaviour.

Examples may include:

- unnecessary or inappropriate physical contact;
- favouritism towards a particular child or young person;
- inappropriate jokes, language or comments;
- over-familiarity with children or young people;
- unnecessary one-to-one contact;
- inappropriate digital or social-media communication;
- sharing personal information with a child or young person;
- seeking or maintaining contact outside approved SSF channels;
- behaviour that could reasonably be perceived as grooming or boundary testing;
- inappropriate gifts or special treatment;
- failing to maintain professional boundaries;
- conduct that causes discomfort or concern but does not currently meet the threshold for a child protection referral; or
- behaviour that is inconsistent with SSF's trauma-informed, rights-based and child-centred approach.

These examples are illustrative and are not exhaustive.

13.2 LOW-LEVEL CONCERNS MUST BE TAKEN SERIOUSLY

A low-level concern should never be dismissed simply because:

- the behaviour appears minor;
- there is no immediate evidence of harm;
- the child has not complained;
- the adult appears to have acted with good intentions;
- the adult is well regarded within SSF; or
- the behaviour has occurred only once.

The purpose of the LLC process is to create a culture in which concerns can be raised early, appropriately and without requiring staff to make their own judgement about whether behaviour meets a formal child protection threshold.

It is not the responsibility of the person reporting the concern to determine whether it is "serious enough".

Staff should report the concern and allow the appropriate safeguarding lead to assess it.

13.3 RELATIONSHIP WITH CHILD PROTECTION

A low-level concern must be escalated immediately where information indicates that a child may be at risk of harm or that the behaviour may meet the threshold for a child protection concern or allegation against an adult.

Where there is uncertainty, staff should seek advice from the SSF Child Protection/Safeguarding Manager.

The LLC process must never be used as an alternative to child protection procedures. If a concern indicates that a child may be at risk of significant harm, or that an adult's behaviour may constitute abuse or pose a risk of harm to children, SSF's Child Protection Procedures must be followed immediately.

Where appropriate, concerns will be referred to Police Scotland or Social Work in accordance with the National Guidance for Child Protection in Scotland.

The National Guidance makes clear that safeguarding responsibility extends to everyone who comes into contact with children and young people and sets out expectations for responding to concerns.

13.4 REPORTING A LOW-LEVEL CONCERN

All SSF staff, tutors and volunteers have a responsibility to report a low-level concern. Concerns should be reported as soon as reasonably practicable using the process set out in the SSF Low-Level Concerns (LLC) Policy.

The person reporting the concern should:

1. Record what they have seen, heard or been told.
2. Record the date, time and location where known.
3. Use factual and objective language.
4. Where relevant, record the child's own words.
5. Avoid assumptions, speculation or diagnosis.
6. Report the concern through the SSF LLC reporting process.
7. Seek immediate safeguarding advice if the concern may indicate a higher level of risk.

Staff should not investigate the concern themselves

13.5 CONFIDENTIALITY & INFORMATION SHARING

Information relating to a low-level concern will be handled sensitively and shared only with those who need to know.

Information will be managed in accordance with SSF's information-sharing, confidentiality and data protection arrangements.

The identity of the person raising a concern will be protected as far as reasonably possible, while recognising that information may need to be shared where necessary to safeguard a child, manage risk or meet legal or organisational responsibilities.

13.6 RECORDING AND CENTRAL OVERSIGHT

SSF will maintain a secure record of low-level concerns in accordance with the SSF LLC Policy.

The purpose of maintaining a central record is not to create a punitive system. It enables SSF to:

- identify patterns of behaviour;
- identify repeated concerns involving an individual;
- identify themes across programmes, locations or teams;
- identify potential escalation;
- identify training or supervision needs;
- strengthen organisational safeguarding practice; and
- ensure appropriate management action is taken.

A concern that appears isolated may become more significant when considered alongside other information.

For this reason, patterns and cumulative information must be considered, not only individual incidents.

13.7 RESPONDING TO LOW-LEVEL CONCERNS

The SSF Child Protection/Safeguarding Manager, or another appropriately designated person, will assess concerns in accordance with the LLC Policy.

Depending on the circumstances, the response may include:

- no further action;
- advice or guidance;
- reflective discussion;
- additional supervision;
- professional boundaries training;
- safeguarding training;
- management action;
- review of working arrangements;
- increased supervision;
- a formal HR process; or
- escalation to the child protection process, Police Scotland, Social Work or another appropriate agency.

Any response should be proportionate to the concern and take account of the available information, context, pattern and potential impact on children and young people.

13.8 TRAUMA-INFORMED AND RIGHTS-BASED APPROACH

SSF will manage low-level concerns in a manner consistent with its commitment to trauma-informed practice and children's rights.

This means that:

- the safety and wellbeing of children remains central;
- concerns are addressed without unnecessary delay;
- children are listened to where their involvement is appropriate;
- children's dignity and privacy are respected;
- responses are proportionate;
- staff are treated fairly and respectfully;
- assumptions are avoided;
- information is shared on a need-to-know basis; and
- action is focused on preventing harm and maintaining safe relationships and environments.

A trauma-informed approach does not mean avoiding appropriate challenge or accountability. Where behaviour is unsafe or inappropriate, SSF will take proportionate action to protect children and maintain professional standards.

13.9 CULTURE OF OPENNESS

SSF seeks to create an organisational culture in which everyone feels able to speak up. Staff and volunteers should feel able to say:

"Something about this does not feel right."

They do not need to be certain that a safeguarding threshold has been reached before raising a concern.

Early reporting enables SSF to respond to concerns, provide support, reinforce professional boundaries and identify patterns before behaviour potentially escalates.

This approach supports SSF's wider safeguarding principle that prevention is preferable to responding only once harm has occurred.

13.10 RELATIONSHIP WITH SSF POLICIES

This section must be read alongside:

- SSF Low-Level Concerns (LLC) Policy;
- SSF Child Wellbeing and Protection Procedures;
- SSF Code of Conduct;
- SSF Code of Practice;
- SSF Safe Media Policy;
- SSF Safer Recruitment procedures;
- SSF Disciplinary and Grievance procedures; and
- relevant local child protection procedures.

Where there is any uncertainty about which procedure applies, staff should seek advice from the SSF Child Protection/Safeguarding Manager.

Where the circumstances indicate a child protection concern, the Child Protection Policy and statutory child protection procedures take precedence over the LLC process.

14. ALLEGATIONS AGAINST STAFF, VOLUNTEERS OR OTHER ADULTS

Any allegation or concern that an SSF staff member, volunteer, tutor, contractor or other adult has:

- harmed a child;
- abused a child;
- behaved inappropriately;
- breached professional boundaries;
- behaved in a way that may pose a risk to children; or
- committed an offence involving a child

must be reported immediately through SSF's safeguarding process.

The person receiving the concern must not investigate it themselves.

SSF will follow the relevant local authority, Police Scotland, statutory and employment procedures.

Where appropriate, SSF will make referrals to Disclosure Scotland in accordance with its legal responsibilities.

15. PROFESSIONAL BOUNDARIES AND LONE WORKING

SSF does not ordinarily permit lone working with children.

SSF policy requires a minimum of two staff for sessions and provides a contingency procedure where unexpected circumstances result in a staff member being left alone. Professional boundaries must be maintained at all times.

Staff must:

- use appropriate language and behaviour;
- avoid unnecessary physical contact;
- ensure physical contact is appropriate, proportionate and consent-aware;
- avoid private or secretive relationships;
- avoid favouritism;
- maintain appropriate digital boundaries;
- use SSF-approved communication systems; and report boundary concerns.

16. SOCIAL MEDIA, COMMUNICATIONS, PHOTOGRAPHY AND FILMING

SSF recognises that digital communication, social media, photography and filming can provide positive opportunities to celebrate participation, promote programmes and recognise the achievements of children and young people. However, they also present safeguarding, privacy, consent, data protection and reputational risks.

SSF will ensure that all communication, photography and filming involving children and young people is undertaken safely, appropriately and in accordance with this policy and the relevant SSF procedures.

Digital safeguarding will be considered within programme risk assessments

16.1 COMMUNICATION WITH CHILDREN AND YOUNG PEOPLE

SSF believes that positive, professional relationships and face-to-face communication are important to effective youth work.

Where communication with a child or young person is required outside a session, staff and volunteers must use SSF-approved communication methods and SSF devices, in accordance with the SSF Safe Media Policy.

Staff and volunteers must not:

- use personal mobile phones to communicate with children and young people where an SSF device is available;
- provide their personal mobile number to children or young people;
- communicate with children or young people through personal social-media accounts;
- accept or initiate inappropriate social-media connections with participants;
- use private or secret messaging channels;
- delete or conceal safeguarding-related communications;
- send inappropriate, discriminatory or sexualised content;
- share personal information unnecessarily; or
- establish relationships with children or young people that cross professional boundaries.

SSF policy requires communication with young people to take place through SSF devices and identifies personal mobile numbers and inappropriate social-media relationships as unacceptable practice.

16.2 PHOTOGRAPHY & FILMING

Photography and filming of children and young people must be undertaken in a way that protects their safety, dignity, privacy and rights. Only SSF-owned and approved devices may be used to photograph or film children and young people for SSF purposes.

Staff, tutors and volunteers must not use personal mobile phones, personal cameras, tablets or other personal devices to take photographs or recordings of children or young people participating in SSF activities.

All photography and filming must follow the requirements set out in the SSF Photography and Filming Procedures.

The SSF Photography and Filming Procedures must be followed in relation to:

- consent and permissions;
- the purpose for which images or recordings are taken;
- appropriate use of images;
- storage and security;
- access to images and recordings;
- uploading or transferring images;
- publication and distribution;
- social media use;
- withdrawal of consent where applicable;
- retention and deletion;
- responding to concerns; and
- the use of images involving children who may have additional safeguarding restrictions.
- The Photography and Filming Procedures should always be consulted before photography or filming takes place.

16.3 CONSENT & CHILDREN'S RIGHTS

Photography and filming must be undertaken consistently with SSF's commitment to children's rights.

Children and young people should be given appropriate information about:

- why photographs or recordings are being taken;
- how they may be used;
- where they may appear;
- who may have access to them; and
- what they should do if they have concerns.

Consent and permissions must be obtained and managed in accordance with the SSF Photography and Filming Procedures.

Children and young people should be treated with dignity and respect throughout photography and filming. They must never be pressured, coerced or made to feel that participation in photography or filming is a condition of taking part in an SSF programme.

Where a child does not wish to be photographed or filmed, this must be respected in accordance with SSF procedures.

Particular care must be taken where a child:

- is subject to a specific safeguarding concern;
- is subject to a court or statutory restriction;
- is care experienced;
- is involved in child protection proceedings;
- may be at risk from publication of their image or identity; or
- has specific privacy or safety requirements.

Where there is uncertainty about whether an image can safely be taken or used, staff must seek advice from the appropriate SSF manager before proceeding.

16.4 APPROPRIATE IMAGES

Images and recordings must portray children and young people:

- respectfully;
- appropriately dressed;
- in safe environments;
- participating in appropriate activities; and
- in a manner that does not compromise their dignity or wellbeing.

Staff must consider the potential safeguarding implications of an image before taking, storing, sharing or publishing it.

Images must never be taken:

- in changing rooms;
- in toilets;
- in private areas;
- during personal care;
- during medical treatment unless specifically required and authorised for safeguarding or professional purposes; or
- in any other circumstance where the child's privacy or dignity could reasonably be compromised.

16.5 USE OF IMAGES ON SOCIAL MEDIA AND OTHER PLATFORMS

Images of children and young people must only be shared on SSF social-media accounts, websites, publications or other approved platforms where this is permitted under the SSF Photography and Filming Procedures and the relevant consent/permissions are in place.

Staff and volunteers must not:

- upload SSF photographs or recordings to personal social-media accounts;
- share SSF images through personal messaging applications;
- send images to children or young people through personal accounts;
- tag children or young people from personal accounts;
- identify children unnecessarily in connection with images;
- alter or edit images in an inappropriate or misleading way; or
- share images outside the approved SSF process.

Where an image is being considered for publication, staff must ensure that the applicable consent, safeguarding and privacy requirements have been checked before publication.

16.6 STORAGE AND SECURITY

Photographs and recordings taken on SSF devices must be stored and managed in accordance with SSF's approved systems and procedures.

Staff must not:

- transfer images to personal devices;
- store images in personal cloud storage;
- store images on personal computers or personal memory devices;
- email images to personal accounts; or
- retain images beyond the period permitted by SSF procedures.

If an image is accidentally stored, transferred or shared outside the approved SSF system, this must be reported immediately in accordance with SSF's data protection and safeguarding procedures.

16.7 SAFEGUARDING CONCERNS RELATING TO PHOTOGRAPHY OR FILMING

Any concern about photography, filming or the use of an image must be reported. This includes concerns that:

- a staff member has used a personal device;
- an image has been taken without appropriate permission;
- an image has been shared inappropriately;
- a child has been photographed in an inappropriate setting;
- an adult has behaved inappropriately while taking photographs or filming;
- an image may place a child at risk;
- an image has been obtained or used for an inappropriate purpose; or
- professional boundaries have been breached.

Depending on the circumstances, the concern may constitute a Low-Level Concern, a wellbeing concern or a Child Protection Concern.

Where the concern relates to the conduct of an adult working for or on behalf of SSF, staff must also consider the SSF Low-Level Concerns (LLC) Policy.

Where there is a possibility that a child is at risk of harm, SSF's child protection procedures must be followed immediately.

16.8 LOST OR COMPROMISED SSF DEVICES

Any loss, theft or compromise of an SSF device containing photographs, recordings or other personal information relating to children and young people must be reported immediately.

Staff must not attempt to resolve a potential data breach independently where personal information may have been compromised.

The incident must be reported through SSF's relevant data protection and safeguarding procedures so that appropriate action can be taken.

16.9 PROFESSIONAL RESPONSIBILITY

All staff, tutors and volunteers are responsible for ensuring that their use of digital communication, photography and filming reflects SSF's safeguarding standards.

The use of an SSF device does not, by itself, make photography or filming appropriate. The person taking the photograph or recording must ensure that:

- 1.the activity is permitted;
- 2.the relevant SSF procedures have been followed;
- 3.the appropriate consent/permissions are in place;
- 4.the image is appropriate;
- 5.the child or young person's dignity and safety are protected; and
- 6.the image is stored, transferred and used only through approved SSF processes.

The SSF Photography and Filming Procedures provide the detailed operational requirements and must be read and followed alongside this policy.

Where there is any conflict or uncertainty, staff must seek advice from their manager or the SSF Child Protection/Safeguarding Manager before taking, using or sharing an image.

16.10 POLICY AND PROCEDURE LINKS

This section should be read alongside:

- SSF Photography and Filming Procedures;
- SSF Safe Media Policy;
- SSF Low-Level Concerns (LLC) Policy;
- SSF Code of Conduct;
- SSF Code of Practice;
- SSF Data Protection and Privacy arrangements; and
- SSF Child Wellbeing and Protection Procedures.

17. EQUALITY, INCLUSION AND ADDITIONAL VULNERABILITY

Safeguarding practice must recognise that some children may experience increased vulnerability to harm or additional barriers to seeking help.

This may include children who:

- have disabilities or additional support needs;
- are care experienced;
- experience poverty or deprivation;
- are subject to domestic abuse;
- experience racism or discrimination;
- are LGBTQ+;
- have communication difficulties;
- have experienced trauma;
- are involved with social work;
- have parents/carers experiencing substance use or mental health difficulties;
- are at risk of exploitation or trafficking;
- are asylum-seeking or unaccompanied;
- experience online harms; or
- face other barriers to accessing support.

SSF will never assume that a particular characteristic means a child is vulnerable, but will consider individual circumstances and barriers.

18. MEDICAL CARE, FIRST AID AND INJURIES

SSF will maintain appropriate first aid arrangements.

Where a child requires first aid or medical assistance:

- appropriate first aid equipment must be available;
- staff must know how to summon emergency assistance;
- only appropriately qualified staff should provide first aid within their competence;
- children should be involved and informed in an age-appropriate way;
- consent should be sought wherever appropriate;
- injuries and treatment must be recorded;
- parents/carers should normally be informed; and
- emergency medical assistance must be obtained where required.

Where informing a parent/carer may place a child at greater risk, staff must seek safeguarding advice before doing so.

19. TRANSPORT AND TRAVELLING WITH YOUNG PEOPLE

Where SSF provides or arranges transport:

- appropriate parental/carer consent must be obtained where required;
- approved transport providers must be used;
- personal vehicles must not be used
- seatbelts must be worn;
- supervision arrangements must be appropriate;
- transport risk assessments must be completed; and
- emergency contact information must be available.

20. INFORMATION SHARING, CONFIDENTIALITY AND DATA PROTECTION

SSF recognises that effective safeguarding may require information to be shared. Information will be:

- lawful;
- necessary;
- proportionate;
- relevant;
- accurate;
- secure; and
- shared only with those who need to know.

SSF will comply with applicable data protection law, including the:

- Data Protection Act 2018;
- UK General Data Protection Regulation (UK GDPR);
- applicable privacy and electronic communications requirements; and
- relevant statutory safeguarding guidance.

Safeguarding information should not be withheld where sharing is necessary to protect a child.

Where safe and appropriate, the child or young person should be informed about information sharing in a manner they can understand.

Parents/carers will normally be informed where appropriate. However, information must not be shared with a parent/carers where doing so may increase risk to the child or compromise a child protection or criminal investigation.

SSF policy already adopts this principle and provides for information sharing with Policy Scotland, Social Work and partner organisations where necessary to protect a child.

21. PARENTS AND CARERS

SSF recognises parents and carers as important partners in supporting children's wellbeing.

SSF will:

- communicate safeguarding expectations clearly;
- provide appropriate information;
- encourage children and families to raise concerns;
- work collaboratively where safe and appropriate; and
- respect parental rights and responsibilities.

However, safeguarding the child remains the priority.

Where a parent/carers is implicated in a concern, staff must seek safeguarding advice before informing them.

22. UNEXPECTED INCIDENTS AND ACCIDENTS

Any unexpected safeguarding incident must be reported promptly.

Examples include:

- accidentally injuring a child;
- a child misinterpreting an interaction;
- an inappropriate incident;
- an allegation against a staff member;
- a member of staff being left alone with children unexpectedly;
- an incident involving restraint; or
- any event that creates a safeguarding concern.

All incidents must be recorded and reviewed.

Any physical intervention or restraint must only occur where necessary to prevent immediate harm and must be the minimum necessary response, consistent with law, training and SSF procedures.

23. **AFTERCARE AND RECOVERY**

SSF recognises that safeguarding concerns can have a lasting impact on children, young people and staff.

Following a significant incident, SSF will consider:

- the child's immediate safety;
- ongoing wellbeing;
- their wishes and views;
- appropriate support services;
- trauma-informed support;
- communication with parents/carers where appropriate;
- multi-agency support;
- follow-up arrangements; and
- review of the safety plan.

Support should be proportionate, individualised and based on the child's needs and wishes.

SSF will also support staff who have been affected by safeguarding incidents, recognising the potential impact of secondary trauma and cumulative stress. Arrangements can be made for bespoke aftercare for young people and structured support and debriefing for staff following significant incidents.

24. COMPLAINTS, WHISTLEBLOWING AND SPEAKING UP

SSF will ensure that children, young people, parents/carers, staff and volunteers can raise safeguarding concerns without fear of retaliation.

Concerns can be raised about:

- another person;
- SSF practice;
- a safeguarding decision;
- organisational culture;
- professional boundaries;
- discrimination;
- unsafe environments; or
- failure to respond appropriately to a concern.

Staff must never be disadvantaged for raising a genuine safeguarding concern in good faith as set out in SSF Whistleblowing Policy.

25. RECORD KEEPING

SSF will maintain accurate safeguarding records.

Records should:

- be factual;
- distinguish fact from opinion;
- use the child's own words where possible;
- include dates and times;
- identify actions taken;
- identify who received the information;
- record decisions and rationale;
- be stored securely; and
- be retained in accordance with SSF's retention requirements and applicable law.

Records relating to safeguarding must not be stored on personal devices or personal accounts.

26. PARTNERSHIP WORKING

Safeguarding is a multi-agency responsibility.

SSF will work appropriately with:

- local authority social work;
- Police Scotland;
- health services;
- schools and education services;
- child protection committees;
- commissioned partners;
- other relevant voluntary sector organisations; and
- specialist services.

SSF will cooperate with statutory child protection processes and will not obstruct or duplicate formal investigations.

Scotland's current national approach continues to emphasise multi-agency public protection and continuous improvement across agencies.

27. RELEVANT LEGISLATION AND NATIONAL GUIDANCE

This policy should be read alongside the current versions of applicable legislation and guidance.

The principal Scottish and UK legislation relevant to SSF's child safeguarding work includes, but is not limited to:

Children and child protection

- Children (Scotland) Act 1995
- Children's Hearings (Scotland) Act 2011
- Children and Young People (Scotland) Act 2014
- Adoption and Children (Scotland) Act 2007
- Children (Care and Justice) (Scotland) Act 2024
- Age of Criminal Responsibility (Scotland) Act 2019
- Children (Equal Protection from Assault) (Scotland) Act 2019

The Children and Young People (Scotland) Act 2014 remains an important part of Scotland's legal framework for children's services and protection.

The Children (Care and Justice) (Scotland) Act 2024 includes specific provisions requiring consideration of the effects of trauma on children within the children's hearings system and strengthens safeguards around children involved in justice processes.

Children's rights and human rights

- United Nations Convention on the Rights of the Child (UNCRC)
- UNCRC (Incorporation) (Scotland) Act 2024
- Human Rights Act 1998
- Equality Act 2010

The UNCRC Act is now part of Scotland's domestic legal framework, with the relevant Part 3 provisions in force from 16 July 2024.

27. RELEVANT LEGISLATION AND NATIONAL GUIDANCE

Safeguarding and criminal law

- Protection of Children and Prevention of Sexual Offences (Scotland) Act 2005
- Sexual Offences (Scotland) Act 2009
- Abusive Behaviour and Sexual Harm (Scotland) Act 2016
- Domestic Abuse (Scotland) Act 2018
- Domestic Abuse (Protection) (Scotland) Act 2021
- Human Trafficking and Exploitation (Scotland) Act 2015
- Modern Slavery Act 2015
- Female Genital Mutilation (Protection and Guidance) (Scotland) Act 2020, alongside applicable UK legislation
- Forced Marriage etc. (Protection and Jurisdiction) (Scotland) Act 2011

Safer recruitment and disclosure

- Protection of Vulnerable Groups (Scotland) Act 2007
- Disclosure (Scotland) Act 2020

PVG membership is now mandatory for regulated roles, and the current PVG system includes five-year membership for new applications from 1 April 2026.

Data protection

- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Privacy and Electronic Communications (EC Directive) Regulations 2003, where applicable

Health, safety and welfare

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), where applicable
- relevant first aid, premises, transport and fire safety legislation and guidance.

This list is intended to identify the principal legislation relevant to SSF's safeguarding activities. It is not an exhaustive legal register. SSF will maintain a separate legislation and guidance register and obtain appropriate legal advice where required.

28. NATIONAL GUIDANCE AND PRACTICE FRAMEWORKS

SSF will have regard to current versions of relevant national guidance, including:

- National Guidance for Child Protection in Scotland 2021 – updated 2023;
- GIRFEC;
- UNCRC implementation guidance;
- Scottish Government trauma-informed practice guidance and resources;
- relevant Child Protection Committee procedures;
- Disclosure Scotland guidance on regulated roles and PVG;
- relevant sportscotland / Child Wellbeing and Protection in Sport guidance;
- national guidance relating to child sexual abuse and exploitation;
- guidance relating to harmful sexual behaviour;
- guidance relating to child trafficking and exploitation; and
- relevant information-sharing and data protection guidance.

The National Guidance for Child Protection in Scotland remains the key national framework describing responsibilities and expectations for those involved in protecting children.

29. SAFEGUARDING GOVERNANCE

The SSF Board has overall responsibility for ensuring that safeguarding is embedded within organisational governance.

SSF will maintain:

- a designated safeguarding/child protection lead;
- clear escalation arrangements;
- appropriate Board safeguarding oversight;
- safeguarding reporting mechanisms;
- regular policy review;
- staff training records;
- PVG monitoring;
- incident and concern monitoring;
- risk management;
- learning from safeguarding incidents; and
- appropriate external partnership arrangements.

Safeguarding will be considered in organisational decision-making, programme design, recruitment, commissioning and risk management.

30. POLICY REVIEW

This policy will be reviewed:

- at least annually;
- following significant safeguarding incidents;
- following legislative change;
- following changes to national guidance;
- following changes to SSF services or delivery models; or
- where learning identifies a need for earlier review.

The review will consider feedback from:

- children and young people;
- staff;
- volunteers;
- parents/carers;
- partners;
- safeguarding professionals; and
- relevant statutory agencies.

31. SSF SAFEGUARDING COMMITMENT

SSF is committed to creating environments where every child and young person:

- feels safe;
- knows who they can speak to;
- is listened to;
- understands their rights;
- is treated with dignity and respect;
- is protected from abuse and neglect;
- can participate without discrimination;
- has their individual needs recognised;
- is supported using trauma-informed approaches;
- has appropriate choices and control;
- can enjoy sport, physical activity and youth work safely; and
- receives appropriate support when things go wrong.

Safeguarding is everyone's responsibility.

Where there is a concern about the immediate safety of a child, staff must act without delay and follow SSF's safeguarding procedures and the relevant statutory child protection arrangements.

APPENDIX 1: WHAT IS A CONCERN?

Behaviour Niggle	A behaviour niggle is when a young person at the session has displayed challenging behaviour which has impacted on them, staff and other young people. Or that their behaviour is not as it is usually. As we know behaviour is communication and usually challenging behaviour is a sign that something is going on in that young person's life.
Wellbeing Concern	Child Wellbeing are concerns which in isolation, do not always meet the threshold for a child protection referral to social work or police but still have an impact on the wellbeing of the child or young person and require attention Examples may include: bullying, mental health concerns, bereavement, family separation and self-harm.
Child Protection Concern	Child Protection are concerns for children or young people who are at risk of, or suffering, significant harm or abuse. Child protection matters are reported to police or social work. Examples may include physical abuse, neglect, sexual abuse, radicalisation, emotional abuse, trafficking or sexual exploitation.

APPENDIX 2: MANAGING CONCERNS

Respond: Is this an observation, direct disclosure, third party disclosure or an event at the session? Who is involved, are they safe – if not, can you take immediate action to make them safe? Keep calm, reassure YP involved, listen to their words. Take action to ensure wellbeing of any other YP at session.	Reflect: Do you need support? Or can you manage this within session? Who can provide you with support? • Other staff at session • Contact CP manager. • Online supports • Helplines • Police/Social Work
Escalate: If the safety of YP/group/staff/community is at risk, contact Police/ Social Work immediately. Example: YP brings a knife to session but then leaves. The risk is reduced in the session but still exists in the community therefore the police should be contacted.	Record: • Online reporting forms – record information of incident/concern • Consider the quality of the information you record. Date, time, location, type of event (i.e. disclosure), any injuries, actions taken and supports contacted- if Police or SW called then record police incident number or officer badge number if they attend/name of Social Worker ***only complete reporting form when all YP and staff are safe and incident/event is resolved

APPENDIX 3: WHO DO I TELL?

Glasgow

Manager/CPO: Alistair Neil
YDCs: Ahmed Mumin (New
Scots Lead)
Diane Barbour
Eve O'Donnell
Emily Waugh

North Ayrshire

Manager/CPO: Alan Hendry
YDCs: Robyn Caldwell
Declan Hannah

Clackmannanshire

Manager: Neal Herbert
CPO: Mairi Lindsay
YDCs: Maciek Kornobis
Paige Boyle

Education & Training

For any Child protection and
Safeguarding concerns for internal
delivery please contact: Mairi Lindsay
(Child Protection & Safeguarding
Manager) 07522568041

For any concerns for external delivery
please contact the course organiser
directly as well as CP Manager.
CPO – Child Protection
Officer YDC – Youth Development
Coordinator

Behaviour Niggle

Consult YDC and complete safeguarding reporting form

Wellbeing Concern

Consult YCD/Manager and complete safeguarding
reporting form

Child Protection Concern

Ensure immediate safety of child. Contact relevant
Statutory Authority and CP Manager. Complete
safeguarding reporting form.

APPENDIX 4: SIGNS OF ABUSE

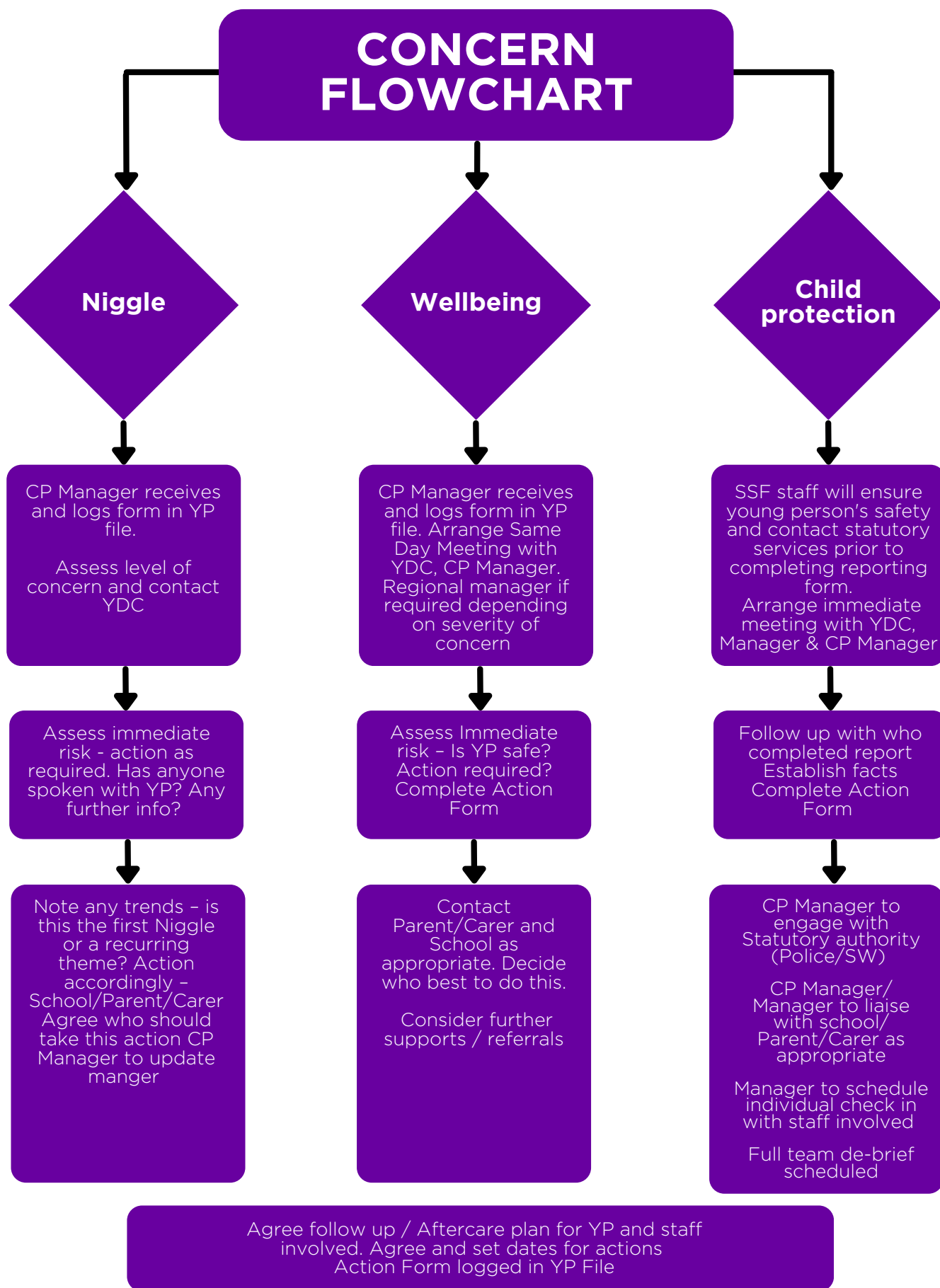
Physical Abuse, Emotional Abuse, Sexual Abuse, Neglect

- Unexplained changes in behaviour
- Emotional behaviour - aggression, anger, withdrawn Increased anxiety
- Visible bruises, unexplained injuries
- Poor relationships, self isolation
- Inappropriate language for age and stage
- Nervous around certain individuals (i.e fear of adult men)

The presence of these indicators does not automatically mean abuse is occurring

TRUST YOUR INSTINCT

APPENDIX 5: CONCERN FLOWCHART



APPENDIX 6: SUPPORT SERVICES

Social Work Contacts

Police 101- non-emergency
Police 999 for an emergency

Social Work

Glasgow 9am-5pm 0141 287 0555
Glasgow Out of Hours: 0300 343 1505
North Ayrshire 9am – 5 pm 01294 310300
North Ayrshire Out of Hours 0800 328 7758
Clackmannanshire - 9am- 5pm - 01259 225 000
Clackmannanshire - Out of Hours- 01786 470 500

National Support Contacts

Childline – 0800 1111
Breathing space – 0800 83 85 87
Calm harm – app
Cruse bereavement care – 0808 808 1677
LGBT Youth Scotland – live chat on website
PAPYRUS helpline (young suicide prevention society) – 0800 068 4141
SAMH – 0344 800 0500
Shout (text service for anyone in crisis) – SHOUT 85258

YOUR SAFETY MATTERS

SSF ★

Transforming young lives
through sport

1 We want you to feel:

- Safe
- Happy
- Respected
- Included
- Able to be yourself
- You have the right to be listened to and taken seriously

3 If something doesn't feel right:

Sometimes things might not feel okay.
This could be:

- Someone being unkind
- Feeling unsafe
- Being worried about something
- Something happening online
- You can talk to us about anything

5 What Happens When You Tell Us Something

We will:

- Listen carefully
- Take you seriously
- Thank you for telling us
- Help keep you safe

We might need to share what you tell us with other adults to help keep you safe. We will explain this to you.

8 Remember

You are not alone.

It is always okay to ask for help

2 What you can expect from us:

We will:

- Treat you with kindness & respect
- Listen to you
- Take your worries seriously
- Help keep you safe
- Be fair and include everyone

4 How to get help:

You can:

- Talk to a coach or staff member you trust
- Speak to the Safeguarding Lead
- Ask an adult to help you tell someone
- You can talk in your own time. We will listen.

6 Your Voice Matters

You can:

- Share your ideas
- Say how you feel
- Help us make things better

We will listen and try to make changes where we can.

7 Online Safety

- Be careful what you share online
- Tell someone if something worries you
- Adults should not message you⁶³ privately without a good reason.

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www.ssf.org.uk

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