



**RANGERS  
CHARITY  
FOUNDATION**

# **CHILD WELLBEING & PROTECTION POLICY**



## CHILD WELLBEING & PROTECTION POLICY

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### Policy

Rangers Charity Foundation SCIO is fully committed to safeguarding the welfare of all children in its care. It recognises the responsibility to promote safe practice and to protect children from harm, abuse and exploitation.

All staff & volunteers will work together to embrace difference and diversity and respect the rights of children and young people.

This policy document outlines our commitment to protecting children.

### Definitions

#### 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.

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



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### *Definition of Safeguarding*

Safeguarding is taking action to ensure that *all* children and young people are safe from harm when involved in football. 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.

## Principles

Our policy processes are based on the following principles:

- The welfare of children is the primary concern.
- All children, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to protection from all forms of harm and abuse.
- Child protection is everyone's responsibility.
- Children have the right to express views on all matters which affect them.
- We shall work in partnership together with children and parents to promote the welfare, health and development of children.
- When we work through partners, they have a responsibility to meet minimum standards of protection for children in their programmes.

## Our Commitment

We will meet our commitment to protect children and young people from abuse guided by the following principles:

Awareness: We will ensure that all employees, contractors, volunteers and anyone working with children on behalf of the Foundation have the appropriate training to recognise the possible signs of child abuse and the potential risks to a child's wellbeing.

Prevention: A combination of safeguarding practices and the implementation of policy and procedures will ensure we minimize the potential risk of harm to children and ensure that our environment is a safe one.

Reporting: If a concern about a child is identified that affects one (or more) of the child's wellbeing indicators (Safe/Healthy/Active/Nurtured/Achieving/Respected/Responsible/Included)



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this may be discussed with the parent/carer. The best interest of the child will be considered as to what is the best and most suitable support for the individual child. When responding to concerns about the conduct of an adult, we will implement, where appropriate, the relevant disciplinary and appeals procedures.

### Recording and Reporting:

We will ensure that all staff and volunteers are knowledgeable in recording the required information and passing this on to the Child Wellbeing and Protection Officer.

### Review:

We will ensure that the policy and procedures are monitored, evaluated and following the review of an issue/concern raised at the club and it is suggested that the policy should be reviewed, any changes in legislation and government guidance on the wellbeing and protection of children, at least every three years.

All staff and volunteers involved in activities with children will be:

### **INCLUSIVE**

The Foundation is for everyone, irrespective of background. 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 relationships, listening to children's voices, and championing their views in everything we do

### **EMPOWERING**

We are forward facing and strive to be the best for children and young people. We are brave, challenging ourselves and others to continually strive for the best outcomes for children and young people. We encourage and support children and young people to express their views.

### **ACCOUNTABLE**

We accept responsibility and take ownership of the wellbeing and protection of children. Our collective leadership calls upon integrity, consistency and confidence in our everyday behaviours.

## Procedures

The purpose of the procedures is to ensure that all concerns about the care and protection of children and young people are effectively managed via the policies, procedures, systems,



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structures, resources and personnel in place to promote the welfare and protection of children taking part in football and other activities which form part of our programmes of activity.

We will work jointly with parents and other agencies through joint planning, training and monitoring of their arrangements for the protection of children and will ensure that there are quality assurance mechanisms in place to monitor, review and evaluate these arrangements.

### Roles and Responsibilities

#### Child Wellbeing & Protection Officer

This role will be appointed by Rangers Football Club and act in an advisory capacity for the Rangers Charity Foundation and be provided with the appropriate training.

Our Child Wellbeing & Protection Officer will:

- review, monitor, implement and promote our Child Protection policy and all safeguarding policies and procedures throughout the required functions for Rangers Charity Foundation SCIO.
- act as the main contact on behalf of the Foundation for the protection of children and young people.
- provide information and advice on safeguarding and protecting children's wellbeing within the boundaries of the remit.
- support and raise awareness on safeguarding and protecting children's wellbeing.
- keep abreast of developments and understand the latest information on data protection, confidentiality and other legal issues that impact the protection of children.
- establish and maintain contact with local statutory agencies including the police and social work services.
- maintain confidential records of reported cases, action taken, liaise with the statutory agencies and ensure they have access to all necessary information.
- attend appropriate training and development seminars to maintain continuous professional development.
- Develop and deliver training support and support and guidance to staff, volunteers, and board members on safeguarding children's wellbeing.

#### Wellbeing Group

The role of our wellbeing group is to develop a strategic approach to child protection on behalf of the Club/Foundation. The Panel is operated by Rangers Football Club and a representative from the Foundation sits on the Panel. Its specific responsibilities are:

- To develop, agree and review policies and procedures affecting the protection of children, within the framework provided by this guidance.



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- To ensure that equality of opportunity is central to the development of child protection policies and procedures and to guarantee that an equality perspective is incorporated within this policy at all levels and stages.
- To promote and implement a strategy, in conjunction with Child Protection Officer and Foundation Chief Executive for developing effective working relationships between functions, professional and community groups with the aim of safeguarding and promoting the welfare of children.
- To communicate clearly to individual functions and professional groups their shared responsibility for protecting children and explain how that responsibility can be fulfilled.
- To bring to the attention of the Foundation Chief Executive their responsibilities for child protection issues and developments in the area and how our wellbeing group will address these.
- To monitor and evaluate on a regular and continuing basis our partnerships internally and externally.
- To develop a communications and information strategy to ensure that our partnerships, employees and parents/guardian/carers are aware of the need to safeguard children via our Child Protection policy.

## RISKS TO CHILDREN'S WELLBEING & THE VULNERABILITIES PRESENT

### Recruitment

The risks posed within recruitment are around the suitability of a person working with children. Safe recruitment is a key aspect of making the Rangers Charity Foundation SCIO a safer place and reducing the risks for children participating in our activities.

The 'Appointment and Selection' process exists for those in regulated roles with children; incorporating safeguarding considerations. This includes our legal responsibility under the *Protection of Vulnerable Groups (Scotland) Act 2007* to ensure those engaging in a regulated role are not listed on the Children's List which bars them from working with children.

In addition to the legal requirement through PVG scheme membership, two suitable references are gained and an annual Self – Declaration form is completed to ensure the ongoing suitability of the individual. Further to this the PVG membership is updated three-yearly during the continued employment or volunteering with the club.

### RELATIONSHIPS & POSITION OF TRUST

The power and influence that an individual working or volunteering may have over a child that they are working with cannot be underestimated or minimised. It is acknowledged that the child



trusts, has confidence in and may be reliant upon that individual for skill development and/or success. Therefore, it is important that it is recognised that relationships between adults in positions of authority over children are unequal, with a power imbalance that may be used to initiate sexual activity and abuse that position. It is vital to recognise the individual's responsibility for actions, to ensure that they do not abuse their position of trust.

Genuine relationships may occur; however, no intimate relationship should begin whilst the individual is in a position of trust. This is also true of young people who have taken up a leadership role with the club. As it is widely acknowledged that children may suffer abuse at the hands of other young people.

*Sexual Offences (Scotland) Act 2009* defines a '**position of trust**' for the purposes of the offence, as including those who look after children in a range of institutional settings, including schools, hospitals and residential establishments such as care homes or young offenders' institutions.

While sports coaching is not currently included in the legislation, we must work to the principles behind the legislation for all roles that are considered a 'position of trust' within the Rangers Charity Foundation. The Rangers FC/Foundation Code of Conduct for Children's Wellbeing clearly states that, 'forming intimate emotional, physical or sexual relationships with children' is unacceptable behaviour and any breach of the Code of Conduct will result in disciplinary action or report to the police if it is believed that the actions are of a criminal nature.

## **GROOMING**

Generally, most adults engage in activity with children and young people with good intentions; to provide enjoyment and a positive experience for the children with whom they are working. However, there are a minority that may seek to gain access to children through activities for inappropriate reasons, such as sexual abuse.

In order to gain access to children, those with the intent to harm (the perpetrator) will in the first instance make an effort to establish and develop a trusting relationship with others around the child; including members of staff or volunteers, parents and/or carers and even other children. This process is known as 'grooming'. Grooming is a gradual process that may take place over a varying period of time, from days to months or even years. This process will not always develop in the same way.

The perpetrator may attempt to gain the trust of the young person and his/her parents/carers by; making promises, providing gifts, taking on outings and trips overseas, providing special attention or favouritism toward the child, as well as creating opportunities to be alone with the child. Once a trusting relationship has been established, the perpetrator will manipulate and control the child in order to gratify his/her own sexual needs.

Having an awareness and understanding of grooming will strengthen the safeguarding measures to reduce the risk and protect children from sexual predators.



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*Protection of Children and Prevention of Sexual Offences (Scotland) Act 2005* addresses 'grooming' behaviour as an offence. Any signs of adult behaviour that may indicate grooming is taking place, should be reported to the Child Wellbeing and Protection Officer immediately.

### CHILDREN THAT ARE DEAF OR HAVE A DISABILITY

All children have the right to be safe and happy and UNCRC Article 23 further reminds us that 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. Research shows that children with communication impairments, behavioural disorders, learning disabilities and sensory impairments are particularly vulnerable and are more likely to be abused than non-disabled children (\*Jones 2012).

Children with disabilities may be more vulnerable because they may:

- Depend on others for intimate care or handling
- Depend on the abuser for their participation in sport (football)
- Fear disclosing abuse
- Have a reduced capacity to resist either verbally or physically
- Having a reduced capacity to resist either verbally or physically
- Limited verbal communication, use sign language or other form of non-verbal communication
- Lack of supportive network to protect them
- Unable to recognise or understand the inappropriateness of actions or behaviours
- Not be believed due to negative attitudes towards children with disabilities

*\*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 FROM BLACK & ETHNIC COMMUNITIES

All children should be treated equally and should not be discriminated against (UNCRC Article 2) but unfortunately, within wider society, discriminatory behaviour still exists. Racism remains the most common form of discrimination, in football, for example. Therefore, children from these groups are additionally vulnerable. They may:

- Experience racism, racist abuse/bullying and harassment and racist attitudes
- Have experience of racism being ignored or not responded to by others
- Be afraid of further abuse/bullying if they challenge the discriminatory behaviour
- Want to 'fit in' and therefore, avoid 'making a fuss'
- Not use English as their first language

## Responding to Concerns Procedure

In all cases where there are concerns about a child or young person or the conduct of an adult towards a child, the best interests and wellbeing of the child will be the paramount consideration. These procedures aim to ensure that all concerns about the conduct of an adult



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are dealt with in a timely, appropriate and proportionate manner. No member of staff, volunteer or member of the Board in receipt of information that causes concern about the conduct of an adult towards children shall keep that information to himself or herself or attempt to deal with the matter on their own.

The following procedures will help:

- Those receiving information, avoid engaging in subjective judgments
- Reassure those reporting the concern that an appropriate course of action will ensue
- Provide a step by step process for those tasked with managing the concern
- Safeguard the rights of the individual whom complaints or allegations have been made against

No member of staff, volunteer or member of the Board in receipt of information that causes concern about the conduct of an adult towards children shall keep that information to himself or herself or attempt to deal with the matter on their own. The following procedure must be followed regardless of whether the concerns arise through the adult or child or young person's involvement in football or from outside of football.

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 the Club's Child Wellbeing and Protection Officer for advice and support on 07545059463 or arlenesinclair@rangers.co.uk

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

- Take whatever action is required to ensure the child's immediate safety.
- Pass the information immediately to the police and seek their advice.

Report the concern to the Club's Child Wellbeing and Protection Officer, advising that the matter has been reported to the police

### EVERYONE'S RESPONSIBILITY

A concern may range from mild verbal bullying to physical or sexual abuse and occur either through football or outside of it, for example within the child's home. All concerns will be responded to by the Child Wellbeing and Protection Officer. 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 Child Wellbeing and Protection Officer
- 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 Concern Recording Form or in email format and report the concern to the Child Wellbeing and Protection Officer.

## RECOGNISE

Staff, volunteers and Board members may be informed of a concern about a child in a variety of ways:

- This may be a direct disclosure by the child or young person
- It may become clear due to your observation of a child or young person which may represent a change in behaviour, appearance or nature
- It may be information shared by an individual or another organization, with a concern of possible abuse of a child, or it may be observed by another child or an adult.

Any concerns affecting the wellbeing of a child must be reported to the Child Wellbeing and Protection Officer on the day the concern arises, as soon as practically possible.

What to do if a child or young person makes a disclosure to you:

- React calmly to ensure the child feels safe
- Listen to the child and tell them that you are taking what they say seriously. Do not show disbelief.
- Reassure the child they are not to blame and were right to tell someone.
- Be aware of interpreting what a child says, especially if they have learning or physical disabilities which affect their ability to communicate or if English is not their first language.
- 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 believe that they are in a consenting relationship with the adult
- Avoid asking any questions. If necessary, only ask enough questions to gain basic information to establish the possibility that abuse may have occurred. Only use open-ended, non-leading questions e.g.
  - What happened/is happening?
  - When did this happen?
  - Where did this happen?
  - Who was it/ is involved?

Do not:

- Panic.
- Display shock or distaste.
- Project your own reactions onto the child.
- Do not introduce personal information from either your own experiences or those of other children.
- Probe for more information than is offered.



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- Speculate or make assumptions.
- Rush into actions that may be inappropriate
- Make negative comments about the person against whom the allegation has been made.
- Approach the individual against whom the allegation has been made.
- Making any promises, agreeing to keep secrets and/ or giving a guarantee of confidentiality.

### RECORD

All concerns must be recorded using the Concern Recording Form as soon as possible. Record keeping is of critical importance and all information should be recorded in line with the following:

#### Do

- Make a written record of the information as soon as possible
- Make the record factual, accurate and legible
- If the concern arises from a disclosure from a child or young person, record using the child or young person's own words, where possible
- Include dates, times, locations and contexts, if known, in which the concern occurred, together with any other relevant information

#### Do not

- Give your opinion, unless it is backed up by substantial evidence
- Use judgmental language
- Write the record in a way that protects the reputation of the Foundation or the individual whom the concern relates to; you should remain unbiased throughout

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 them, and that this is the purpose of their details being shared, they will be more included and informed of the processes.

### REPORT

Concerns must be recorded using the Concern Recording Form as soon as possible. Contact Arlene Sinclair, Child Wellbeing and Protection Officer on 07545059463 to report the concern then email the completed form to [arlenesinclair@rangers.co.uk](mailto:arlenesinclair@rangers.co.uk) as soon as possible after completion; do not delay by attempting to obtain information to complete all sections or if you are unable to contact the Child Wellbeing and Protection Officer by phone.

If there is any uncertainty about the appropriate course of action where there are concerns about a child's wellbeing, advice should be sought from the Child Wellbeing and Protection



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Officer. This can be discussed by anonymising the individual involved, therefore maintaining confidentiality if appropriate.

\*If the Child Wellbeing and Protection Officer is not available and an immediate response is required, the police and social work services must be contacted. Both have a statutory responsibility for the protection of children, and they may already hold other concerning information about the child. Record any advice given, actions taken and the response by other agencies. At the earliest opportunity, thereafter the Child Wellbeing and Protection Officer should be informed.

### Confidentiality

To maintain confidentiality do not keep any electronic, printed or written versions of the information you have provided. The Concern Recording Form should be deleted or destroyed (by means of shredding) as soon as the information has been passed on. The Child Wellbeing and Protection Officer 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 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.

### Concern about the conduct of the Child Wellbeing and Protection Officer

Where the concern is about the Child Wellbeing and Protection Officer it must be reported to the Director responsible for Children's Wellbeing at the Club. In this situation, the Director responsible for Children's Wellbeing will then take on the role and responsibilities as listed below of the Child Wellbeing and Protection Officer.

### RESPOND

The following sets out the steps which will be taken by the Child Wellbeing and Protection Officer after the concern has been reported.

#### a) Establish the Facts

Once the concerns have been reported, the Child Wellbeing and Protection Officer will:

- Establish the basic facts and conduct an initial assessment to determine the appropriate course of action depending on whether the concern relates to the wellbeing of a child or the conduct of adult towards a child or young person.
- Decide who should be informed of the concern; this may include the child or young person, their parent/carer or external agencies.
- Consult with members of the Rangers Safeguarding Panel and/or external agencies such as the police and social work services for advice at any time. This is important as these



agencies may hold other important information which, when considered alongside the current concerns, builds a significant picture of concern.

All subsequent actions taken and reasons for decisions shall be recorded (in the order in which they happened). These records should be signed and dated by the Child Wellbeing and Protection Officer. Where Disciplinary Procedures are invoked for members of staff or volunteers, a written record will be made of all actions and reasons for decision.

b) Conducting the Initial Assessment

The Child Wellbeing and Protection Officer will conduct 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.

In all cases, the initial assessment may involve:

- Speaking to the individual that raised the concern for further information
- Speaking to other members of staff, volunteer or member of the Board, who may have other information relating to the concern
- Speaking to the member of staff, volunteer or member of the Board whose conduct has been reported may be approached as part of the information gathering process. This is subject to the nature and seriousness of the situation and should not be carried out if the concern indicates that the conduct may be of a criminal nature
- Where the nature and seriousness of the information suggests that a criminal offence may have been committed, or that to assess the facts may jeopardise evidence, advice will be sought from the police before the member of staff, volunteer or member of the Board is approached.

If the concern relates to a child or young person:

- It may be appropriate to speak to the child or young person involved. This may require the need to ask the some basic, open-ended, non-leading questions solely with a view to clarifying the basic facts. However, this should not be done if it is suggested that the conduct is of a criminal nature, without first gaining advice from the police. If it is necessary to speak to the child to clarify the basic facts, best practice suggests that another adult known to the child or young person is present and the child or young person understands what you wish to talk about. Best practice also suggests that consent should be gained from the child or young person's parent/carer, unless by doing so, would place the child at risk.
- It may also be necessary to ask similar basic, open-ended, non-leading questions of other children, or other appropriate individuals with a view to clarifying the basic facts.

#### Views of the Child

Children have the right to express their views, feelings and wishes in all matters affecting them and to have their views considered and taken seriously (Article 12, UNCRC). This must be at the



forefront of any concerns that are raised about a child. Those views should be given due weight based on the age and maturity of the individual child.

Each child also has the right to privacy (Article 16, UNCRC); this is important to consider when assessing if and at what stage information will be shared and who the information will be shared with.

Where concerns are raised about a child, we will consider what wellbeing indicators are being negatively impacted upon and may discuss this with parents/carers. Common sense is advised in these situations with the individual child's needs and best interests being considered as the top priority. Children should be asked who they would like to be informed and if relevant; consent gained from the child.

If the information indicates that a criminal offence has been committed against the child or young person it would not be appropriate to speak to or ask the child or young person questions about the incident, unless it is a direct disclosure from the child. Interviewing children about possible abuse and criminal offences is the sole remit of specially trained police officers and social workers. Questioning of children by those conducting an initial assessment should always be avoided as far as possible.

Where the concern about a child's wellbeing suggests they need 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 Rangers Charity Foundation shall investigate allegations of abuse or decide whether a child has been abused or not.

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

The Child Wellbeing and Protection Officer will deal with the concern in line with Rangers Charity Foundation Disciplinary Procedures for members of staff and volunteers, in conjunction with the Foundation Chief Executive. In the event of an investigation into the conduct of a member of staff, volunteer or member of the Board, all actions will be informed by the principles of natural justice:

- The individual will be made aware of the nature of concern; and
- The individual 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.



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, volunteer or member of the Board towards a child / young person.

### 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 towards a child or young person. 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 club 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

In all cases consideration should be given support as to what support, if any, is required for the child or young person.

### Sharing Concerns with Parents/Carers

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 the appropriate relevant partner organization who may then share it 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 need 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 a member of staff or volunteer amounts to poor practice, the Child Wellbeing and Protection Officer will deal with the concern in line with Rangers Charity Foundation Disciplinary Procedures for members of staff and volunteers 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 initial assessment supports a concern that the conduct of a member of staff or volunteer amounts to serious poor practice and/or misconduct, the Child Wellbeing and Protection Officer will share the findings of the initial assessment with the Foundation Chief Executive, if applicable, who will respond in line the Foundation's Disciplinary Procedures.

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

Where the initial assessment of information gives reasonable cause to suspect an adult's behaviour and conduct has been a criminal offence, the Child Wellbeing and Protection Officer will:

- Report the concerns to the police as soon as possible on the day the information is received; 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
- A copy of the Concern Recording Form should be provided to the police on request.



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- The parents/carers of the children young people involved will be informed as soon as possible unless the police advice is not to do so; and
- If appropriate, share the information with the child's Named Person unless the police advice is not to do so

Advice will firstly be obtained from the police about informing the member of staff, volunteer or member of the Board 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, volunteer or member of the Board.

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

Possible outcomes include one or more of the following:

- Police investigation; this 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 club and a member of the PVG scheme.

Referring to Disclosure Scotland

The Child Wellbeing and Protection Officer, on behalf of the Rangers Charity Foundation, 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 Rangers Charity 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



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- given inappropriate medical treatment to a child

AND as a result:

1. Rangers Charity Foundation has dismissed the member of staff or volunteer.
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.
3. Rangers Charity Foundation has transferred the member of staff or volunteer to a position in Rangers Charity Foundation which is not regulated work with children.
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 Child Wellbeing and Protection Officer 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 Rangers Charity Foundation; or
- resigned, retired or been made redundant; or
- transferred to another position in Rangers Charity Foundation which is not regulated work with children.

### Information from Disclosure Scotland

If Disclosure Scotland notifies the Child Wellbeing and Protection Officer that a member of staff or volunteer is 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 will be paramount consideration.

If Disclosure Scotland informs the Child Wellbeing and Protection Officer that an individual is barred, that member of staff or volunteer will be removed from regulated work with children immediately in line with the Protection of Vulnerable Groups (Scotland) Act 2007.

### PRECAUTIONARY SUSPENSION

Suspension is not a form of disciplinary action. The member of staff or volunteer involved may be suspended whilst an investigation is carried out in accordance with Rangers Charity Foundation's Disciplinary Procedures. At the suspension interview the member of staff or volunteer will be informed of the reason for suspension (within the confines of sharing information) and given the opportunity to make a statement; which will be recorded, should they wish to do so.

Notification of the suspension and the reasons will be conveyed in writing to the member of staff or volunteer in accordance with Rangers Charity Foundation's Disciplinary Procedures.



## CRIMINAL PROCEEDINGS

An ongoing criminal investigation does not necessarily rule out investigation by the Child Wellbeing and Protection Officer or disciplinary action by the Rangers Charity Foundation. However, any action taken must not jeopardise the criminal investigation and advice must be taken from the police in this situation. Sufficient information should be available to enable the club to decide whether to go ahead with disciplinary action/response.

Once criminal proceedings have concluded, the Child Wellbeing Officer and Foundation Chief Executive will consider the matter and the outcomes in accordance with the Responding to Concerns procedure and Rangers Charity Foundation's Disciplinary Procedures.

## FALSE OR MALICIOUS ALLEGATIONS

Exceptional circumstances where an investigation establishes an allegation or concern raised is false, unfounded or malicious:

- The member of staff, volunteer or member of the Board involved will receive an account of the circumstances and/or investigation and a letter confirming the conclusion of the matter. They may wish to seek legal advice; and
- All records pertaining to the circumstances and investigation shall be kept confidentially; and
- The Child Wellbeing and Protection Officer and Rangers Charity Foundation will take all reasonable steps to support the individual in this situation; and
- In these circumstances Rangers Charity Foundation will review the participation or continued involvement at the Foundation, of the individual that made the false or malicious allegation. If this was a child or young person it may be appropriate to have a discussion with them (with parental/carer permission) to determine their views and opinions; and
- Data collected for the investigation will be destroyed in accordance with the requirements of the General Data Protection Regulation (GDPR).

## ALLEGATIONS OF NON-RECENT ABUSE

The Rangers Charity 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 club's responsibility (on behalf of the Foundation) to refer to Disclosure Scotland.

## MEDIA

All media enquiries relating to the conduct of a member of staff, volunteer or member of the Board of trustees will be referred to Rangers Charity Foundation's Communications Manager.



## CASE REVIEW

### 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 Rangers Charity 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 and protection matters.

### DECIDING TO CONDUCT A REVIEW

The Rangers Charity Foundation may consider the following criteria whilst considering and establishing the need for a case review:

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

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

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

### IDENTIFYING WHO UNDERTAKES THE REVIEW

The Child Wellbeing and Protection Officer should help identify a person to carry out the review; in some circumstances, this may be appropriate to have an independent person. The case reviewer whether internal or external, will have expertise in the concern. These skills may differ according to the circumstances of each case and the agreed role of the Reviewer.

#### External Case Reviewer

The following criteria will be considered when deciding whether the case review should be independent and external to the club:

- Was the harm or risk of harm to the child high?



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- Has the case attracted a significant amount of media interest?
- Is there a lack of experience and knowledge internally regarding the nature of the case?
- Have the Board expressed a preference towards an external reviewer as being more appropriate?

Where the answer has been yes to one or more of the above, there is a presumption that an external Reviewer will be appointed by the Rangers Charity Foundation. The Rangers Charity Foundation will 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 without input into the findings or review recommendations.

Consideration will be given to any formal contractual arrangements required, appropriate legal advice sought, which agencies will enter 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 Rangers Charity Foundation.

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.

### TIMESCALES FOR REVIEW

Timescales will be open to change due to circumstances relating to each individual case. However, it is desirable that the case review should be undertaken as speedily as possible and where able, within an 8-week period from all relevant evidence and correspondence being received.

Where an extension is necessary a progress report and explanation for the extension must be submitted for approval to the Foundation's Chief Executive or Board of Trustees, as appropriate.

### FIRST STEPS OF THE REVIEW

The 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.



## 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. The review is not in place to reopen or reinvestigate concerns. All relating evidence and correspondence 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 and to relieve any concerns, the purpose of the review should be made clear from the start. 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 review, Reviewer will make a record of the review and its findings. This need not be a lengthy report, although in certain circumstances, a full report may be appropriate.

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.

## ESTABLISH THE FACTS OF THE CASE, A CHRONOLOGY OF EVENTS AND THE ROLES OF INDIVIDUALS AND ORGANISATIONS INVOLVED

Set out the actual sequence of events to help to understand what happened, when, and who was involved.

## IDENTIFY ANY ISSUES OF KEY QUESTIONS RELATION TO THE AIMS OF THE REVIEW

The Reviewer should then be able to answer the questions contained in the specific remit of the review.

If the Reviewer considers that a child may still be at risk despite action taken during the case or as a result of the Rangers Charity Foundation's 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.

#### IDENTIFY ANY OTHER RELEVANT POINTS OR OBSERVATIONS

The Reviewer may identify issues which are worth exploring further. This list is not exhaustive but may include:

#### PROCEDURES

- Were the relevant procedures followed?
- If not, is there a reasonable explanation for this?
- Were the timescales appropriate?
- Do the current procedures provide adequate information about what to do in such a situation?
- If appropriate, was a referral made to Disclosure Scotland as required by the Protection of Vulnerable Groups (Scotland) Act 2007?

#### PEOPLE

- Were the right people involved?
- Were the views of the child/family obtained?
- Were those involved aware of the procedures?
- Had the people involved been trained on the procedures?
- Where appropriate, were external organisations involved; for example, the police or social work?

#### OUTCOMES

- Was the outcome appropriate in the case?
- If not, why not?
- Is there a need to take further action in this case; for example, referring the case to police/social work?
- Were the right people told the right things about the outcome?

#### RECORDING

- Were records kept?
- Is the quality of the information recorded satisfactory?
- Can the forms be improved?

#### IDENTIFY ANY LESSONS TO BE LEARNED, CHANGES NEEDED AND MAKE RECOMMENDATIONS

If the Reviewer has gone through the above table and can identify gaps or areas of missed opportunity, these should inform the Reviewer's recommendations.

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



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### RESPONDING TO THE FINDINGS AND RECOMMENDATIONS

Recommendations will be reported to the Rangers Charity Foundation or member of the Board of Trustees (as appropriate).

The report should include recommendations of learning, training needs or update to policy and procedures which should be addressed and responded to within an appropriate timescale.

The report should include the recommendations only and not any details about the case, to preserve the child or young person's privacy, as well as others involved. The Rangers Charity 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 Rangers Charity Foundation will identify:

- How will we prioritise these?
- What action is required?
- Who will take action to address the recommendations?
- What are the 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 Chair of the Trustees or member of the Board of Trustees (as appropriate) will consider whether this decision requires to be communicated further e.g. interested parties; persons involved in concern or individual who conducted the Reviewer.

### Safe in Care Guidelines

These guidelines include practical guidance for those working and / or volunteering directly with children to keep the child safe and to promote a safe operating environment for the employee / volunteer on the following areas:

- Adults to Child Ratios
- Physical Contact
- First Aid and the Treatment of Injuries
- Managing Challenging Behaviour
- Transporting Children
- Trips Away from Home (involving overnight stays)
- Information and Communications Technology

Please contact the Club's HR Function for full details of the 'Safe in Care Guidelines'.

### Contact Details



**CHILD WELLBEING & PROTECTION POLICY**

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Foundation Chief Executive <i>Connal Cochrane</i>	T: 0141 580 8775
Community Programmes Manager <i>Jordan Boyd / Jamie Duncanson</i>	T: 0141 580 8775