

RESPONDING TO CONCERNS TOOLKIT



NOTHING
MATTERS
MORE

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ACCOUNTABLE



APPROACHABLE



EMPOWERING



INCLUSIVE

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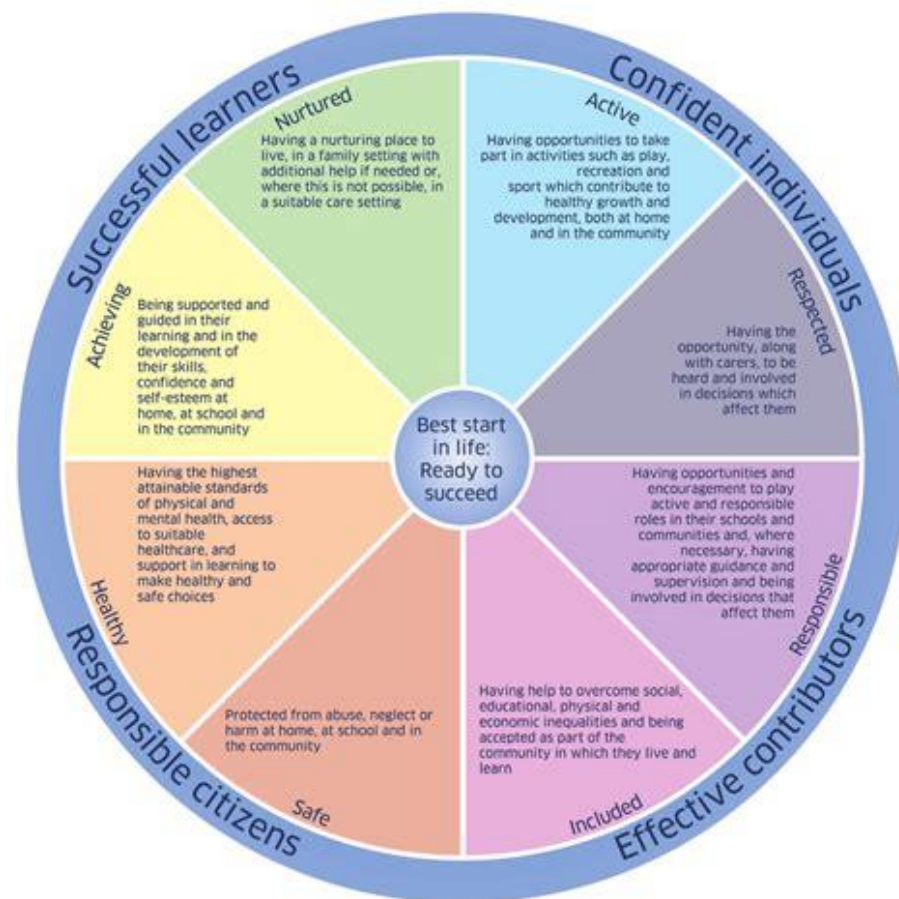
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Introduction

Participating in football can be a highly rewarding experience for children and young people and can have a positive impact on all areas of their wellbeing. Over and above the many health benefits of being active, football also provides an opportunity for children and young people to form new friendships and develop the skills to work and play as part of a team, build confidence and resilience, develop communication and problem solving skills and above all else allows children the opportunity to have fun. For children and young people to enjoy the many benefits of football must be a safe and inclusive environment, where their rights are respected and their voice is heard.

In August 2019 the Scottish Football Association launched its [Child Wellbeing and Protection Strategy 2019-2024: Getting it Right for Every Child in Scottish Football](#). The strategy will shape, define and drive forward the priority areas of work for Scottish Football over the next five years to bring about transformational change in the way our culture, systems, leadership and people prioritise the safety and wellbeing of our children and young people. [The Scottish FA Child Wellbeing and Protection Policy](#) sets out how we will prioritise the safety and wellbeing of children and young people involved with the Scottish FA to ensure that they are part of a safe and nurturing environment that leaves a lasting and positive impact. The policy includes a Responding to Concerns Procedure which sets out the consistent approach that will be taken when responding to all concerns relating to the wellbeing of a child or conduct of an adult involved in Scottish football.



The wellbeing indicators (Safe, Healthy, Active, Nurturing, Achieving, Respectful, Responsible and Included) should be used as a structure for responding to concerns when the wellbeing of a child or young person has been, or is potentially compromised. A concern can be as a result of a specific incident, or a series of events or attributes over a period of time. An example of a concern could be an allegation made against an adult at the club, bullying behaviour displayed by an adult or a young person, or concerns about the behaviour or presentation of a child or young person.

For consistency this toolkit will use the term “concern” however this can also include complaints, reports of incidents and/or disclosures made by a child/young person or third party.



Using this toolkit

The responsibility to safeguard, promote and protect a child or young person's wellbeing in football must be a priority for **everyone** working, volunteering or participating in the game. It does not rest on one person; we are all responsible. However, a key part of the role and responsibility of a Child Wellbeing and Protection Officer (CWPO) is to respond appropriately to disclosures or concerns which relate to the wellbeing of a child, or an adults conduct towards a child or young person.

This toolkit is designed to support CWPOs across Scottish Football and anyone else who is required to properly respond to a concern to carry out this key responsibility. This toolkit is intended to be an interactive tool which can assist when responding to concerns about the wellbeing of a child or young person, or the conduct of an adult towards a child or young person. Every situation is unique so this guidance cannot be prescriptive, however, it should be used as a general guide to support those responding to a concern in line with the [Responding to concerns Procedure](#).

The Responding to Concern toolkit contains vital information on a variety of things the CWPO must consider when responding to a concern, including but not limited to how to:

- Gather information and use that information to reach a conclusion; and
- Communicate with children and young people and seek their views on matters which affect them; and
- Share information appropriately; and
- Take the next steps following the conclusion of a response.

The main document sets out the four stages of any response and the factors which should be taken into account at each stage. This document is supported by appendices which provide further information on specific issues, for example, information sharing and seeking the views of children. There are also associated templates which can be also used when responding to a concern.

For the purpose of this toolkit we have referred to the CWPO as the person responding to the concern, however, this toolkit is equally relevant for other club officials who may be involved in the response to a concern, including anyone who is part of a Safeguarding Panel.

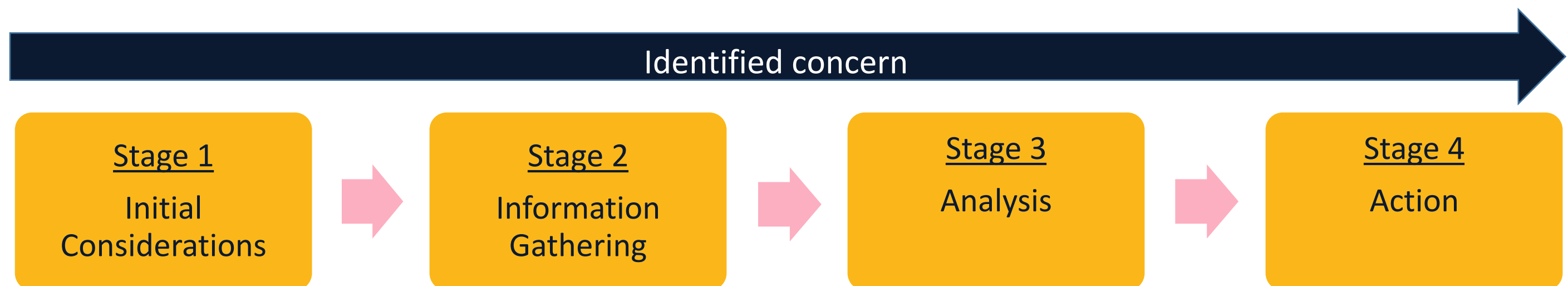
Responding to concerns about the wellbeing of a child or young person, or the conduct of an adult towards a child or young person

Overarching principles of **any** response regardless of the nature of the concern are:

1. The best interests of the child must always be the paramount consideration
2. It must be fair and impartial at all times
3. A response should be completed in a timely manner. Further information on the recommended timescales can be found in **Appendix 6 – Timeline** – click here for [Responding to Concerns toolkit - Appendices](#).
4. Only speak to people who have information, which is relevant to the concern, e.g., someone who has seen or heard something that is directly relevant to the concern
5. Separate facts from opinions and hearsay; only gather factual information based on what someone has seen, heard or know rather than their opinion or what they have heard from others
6. Information should be shared when necessary and in a timely and proportionate manner with the relevant people / agencies
7. Information gathered should be kept confidential and recorded accurately and securely stored
8. The views of the child and their parent or carer should be sought **where appropriate**
9. Any determination and further action must take into account the impact on the child's wellbeing

Before making any determination that the wellbeing of a child or young person has been compromised, or that the conduct of an adult has fallen below the expected standards set out in the [Child Wellbeing and Protection Policy](#), it is important for the CWPO to carry out a fair, impartial and balanced response by gathering and analysing facts relevant to the concern before reaching a conclusion and taking any further action.

The diagram below sets out a staged approach for how this can be done. Following this staged approach allow those responding to a concern to develop a better understanding of the concern, the nature and severity of the risk, what the information is telling them and what action should be taken. It is important to remember that the **process is fluid** and the appropriate response may move stages if new information comes to light, or if the child or young person's circumstances change. For example, if the risk to the child increases you may need to go back to Stage 1 and decide whether immediate action is required.



Stage 1 – Initial considerations

For every concern there are some initial questions which must be considered irrespective of nature of the concern:

- *Is there an immediate risk to the child/young person or to someone else?*
- *What is the concern?*
- *Are you the most appropriate person to respond to the concern?*
- *Is the conduct which has been reported potentially a criminal offence?*
- *If you are a member of an Affiliated National Association (ANA) have you informed the relevant ANA about the concern?*
- *Should the information be shared with anyone, including external agencies?*
- *If the concern relates to the conduct of an adult, is a precautionary suspension appropriate?*
- *If the concern relates to the conduct of an adult towards a child or young person, does the child or young person need any immediate support in light of what is alleged to have happened?*
- *Is there a written record of the concern?*

Throughout each of the stages the CWPO should reflect and revisit these questions and take action, as appropriate. This will ensure that they:

- Continue to have a clear understanding of the concern
- Have taken any action required to protect the wellbeing of the child/young person
- Have shared information as necessary and appropriate
- Continue to support the child or young person

Understanding immediate risk

If there is reason to believe or suspect that the child has been or is being treated in such a way that they are suffering, or are likely to suffer, significant harm then **action must be taken**. This does not require definitive proof but rather a genuine and reasonable concern that **the child's health and development is, or is likely to be impaired** if action is not taken.

Significant harm is a complex matter and relies on an individual's own instinct and judgment, which will be based on our own experiences and what we have learned through training. Having said that, there are some common factors which help to make a decision and have better understanding as to whether there is an immediate risk to a child or young person.

Factors to consider:

- *If I do not take action straight away, is there a likelihood and probability that this child will come to significant harm?*
- *What exactly have I seen or heard that makes me believe this child at immediate risk?*
- *Who do I need to tell or what action do I need to take to remove the immediate risk?*

What you may see or hear:

- *Have you seen someone harm a child?*
- *Is the child in distress?*
- *Does the child appear frightened or worried?*
- *Has the child, or someone else, told you that someone has hurt the child or will hurt the child?*
- *Have you seen anything that makes you think that someone will hurt the child?*
- *Have you heard other people talking about someone's behaviour towards the child?*

If there is any information to indicate that a child is at immediate risk of significant harm, action must be taken to ensure the safety of the child. This can include but is not limited to:

- Removing the child from the situation. This should only be done if it is safe to do so and doing so would not place the child or someone else at risk of harm e.g. taking the child to a safe place at another part of the club.
- Contacting the relevant statutory agency e.g. police and/or social work

It will not always be possible to remove a child from a situation, particularly if the concern about the child's wellbeing is as a result of their parent(s) behaviour. In these circumstances it may not be appropriate or safe to intervene and instead the police or social work should be contacted as they have statutory authority to take the relevant action.

Understanding the nature of the concern

It is important at the outset to be clear what is being reported. Concerns will often understandably be very emotive for the person reporting it which means the initial report may not be always be coherent and/or concise. For example, a parent may telephone to report a concern that their child is or has been bullied at the club and while reporting their concern they are likely to be experiencing a range of emotions including worry, anger, upset and frustration. This does not mean that way they are saying is inaccurate and this should be borne in mind when considering the information they are providing.

Before responding to the concern it is essential to be clear on the nature of their concern as this will directly impact on what information you need to gather and who you need to speak to. You must always acknowledge receipt of the concern with the person who has reported the concern. As part of this acknowledgment, it is helpful to confirm your understanding of the concern so there is no

dubity as to what is being reported. This will allow for the opportunity to correct any misunderstanding at an early stage rather than further down the line. It will also allow for an appropriate outcome to be reached and prevent further concerns, which could have been clarified early on, being raised at the final stage.

Are you the most appropriate person to respond to the concern?

Upon receipt of a concern about the wellbeing of a child or young person, or the conduct of an adult towards a child or young person, you should consider if there is anything that will impair your ability to respond fairly and impartially. This can include:

- If the concern is about you.
- If the concern is about someone you have a personal relationship with e.g. your own child, a spouse or family member.
- If there is, or potentially, any other conflict of interest that you have identified.
- If there is any other factor that will prevent you from acting objectively.

If you have answered 'yes' to any of the above the response to the concern should be undertaken by someone else at the club.

Recognising potential criminal behaviour

Some concerns may be reports of behaviour which could potentially be criminal conduct. If the conduct is potentially a criminal offence it must be reported to the police. At this point advice should also be sought from the police on whether the internal response can also be started in line with the Responding to Concerns Procedure. If there is any doubt as to whether the behaviour is a criminal offence then the police must be contacted on 101 for advice and guidance. No action should be taken, including informing the individual in question, until this has been done.

When a concern is reported to the police they should be asked to provide the Police Reference and a request made for the police to notify the relevant person i.e. the CWPO when it would be appropriate for club/Association to begin their response to the concern. The timescales will vary on when the club/Association can start looking into this concern depending on whether or not there is a police investigation and any subsequent criminal proceedings. If there is any doubt on whether any other action can be taken in relation to the concern, including notifying the person in question of moving onto the information gathering stage, then advice must be sought from the police by contacting them on 101 and quoting the Police Reference.

On the advice of police, it may be necessary to notify the person that the information has been passed to the police and to consider a precautionary suspension. A template for issuing a precautionary suspension in these circumstances (Template 5 – Notice of precautionary suspension) can be found here – [Responding to Concerns toolkit – Templates](#).

Member of an ANA

If your club or team is a member of an ANA e.g. Scottish Youth Football Association (SYFA), Scottish Women's Football (SWF) etc. you should inform the Child Wellbeing and Protection Officer at the relevant ANA of the concern in line with that Association's Child Wellbeing and Protection in Scottish Football Policy. An agreement will then be reached as to who is most appropriate to respond to the concern e.g. the Child Wellbeing and Protection Officer at the club or at the ANA.

Considering a precautionary suspension

If the concern relates to the conduct of an adult who is working or volunteering in Scottish football, consideration will need to be given as to whether they can continue to take part in the football activities while the CWPO looks into the concern. This is commonly known as a “precautionary suspension”.

When determining whether a precautionary suspension is necessary the following should be considered:

- *Could their continued involvement would potentially place children or anyone else at risk of harm?*
- *Could their continued involvement compromise their relationships with other people thereby potentially having a negative impact on the adult in question?*
- *Is the alleged conduct of such a serious nature it would be inappropriate for them to continue their involvement in the football activities until a conclusion is reached?*
- *Would their continued involvement in the football activities jeopardise your ability to gather information in relation to the concern e.g. could they use their position to influence others who you will need to speak to as part of your response?*

A precautionary suspension must always be decided without any pre-judgment or pre-determination of the concern. The decision should be reached with an open mind and should not be made by only one person but instead as a decision of the Safeguarding Panel.

There is no definitive time that someone can be subject to a precautionary suspension, however, this should be reviewed regularly bearing in mind the impact of the precautionary suspension on the person. During this time, there should be appropriate contact with the person. If the concern has not been responded to within the recommended timeline then the decision to issue a precautionary suspension should be reviewed by the Safeguarding Panel. For further information on the recommended timescales for responding to a concern see **Appendix 6 – Timeline** – click here for [Responding to Concerns toolkit - Appendices](#).

A template for issuing a precautionary suspension when there is no ongoing police investigation (Template 4 – Notice of precautionary suspension) can be found here – [Responding to Concerns toolkit – Templates](#).

Support for the child or young person

For all concerns involving a child or young person consideration must be given as to whether the child or young person needs some support them. This decision should be made in the best interests of the child/young person and will depend on the nature of the concern. Sometimes the support may be as simple as having a trusted person at the club/Association who they can talk to.

This support may also include supporting them to stay or return to the club. Remaining at the club after raising a concern or returning to the club after a period of absence can be daunting for a child or young person, especially if the concern relates to another adult or child/young person at the club. Even if the concern does not relate to an incident or someone at the club, it may be of a sensitive nature and the child/young person may be worried or embarrassed or concerned that other people know their personal information. Regardless of the reason, support must be given to the child or young person to ensure they can be involved at the club with minimum impact on their wellbeing.

Recording the concern

Maintaining confidential records is a critical aspect of safeguarding and promoting the wellbeing of children and young people. This record may be required in the future to evidence the action that was taken in response to the concern and in some cases may be relevant for future legal proceedings.

There are a variety of ways that a concern may be brought to the CWPOs attention, for example in person, by telephone or by email. No matter how the concern is reported there must be a written record of the concern and all actions taken thereafter should be accurately recorded.

All records must be stored in a confidential manner and only accessible to those who have the right to this information. To do this, it should be stored in a place that is password protected which only the CWPO and/or relevant people at the club/Association have access to. All records should be stored electronically and should be in held in line with the Club's Data Retention Schedule.

For information and advice on how to securely store this information see Appendix 4 – Maintaining Confidential Records – click here for [Responding to Concerns toolkit - Appendices](#).

Stage 1 - Quick guide

Stage 1 – Checklist

Stage 1 – Initial Considerations	Yes	No	If no, why
I have assessed if there is there an immediate risk to a child or young person and if so I have taken the necessary action to safeguard their wellbeing by informing the police or social work.			
I have understood the nature of the concern based on the information available to me at this time.			
I have assessed if there is there any evidence of criminality, if yes I have shared this information with the police.			
The police have confirmed that I am now able to proceed with my response to the concern.			
I have considered if a precautionary suspension is necessary.			
If a precautionary suspension is necessary this information has been shared with the relevant parties.			
I have acknowledged receipt of the concern with the complainant(s).			
I have confirmed receipt of the concern with the respondent(s) (if appropriate).			
I have created and securely stored a written or electronic record of the concern.			
I have considered the impact on the child/young person’s wellbeing and I have offered appropriate support.			
Consulted with the relevant people or departments within your club for e.g. the board/committee or HR department.			
I have sought advice from the Scottish FA Wellbeing and Protection team or my Affiliated National Association.			

Stage 1 – Relevant Appendices and Templates

[Responding to Concerns toolkit - Appendices](#)

- **Appendix 3 – Information Sharing**
- **Appendix 4 – Maintaining Confidential Records**
- **Appendix 6 – Timeline**

[Responding to Concerns toolkit – Templates](#)

- **Template 1 – Acknowledgment of Concern**
- **Template 4 – Notice of Precautionary Suspension**
- **Template 5 – Notice of Precautionary Suspension (police investigation)**
- **Template 6 – Notification of Concern (conduct of an adult)**

Stage 2 – Information gathering

Information gathering

The next stage will be to gather information which is relevant to the concern. This is a crucial part of the response process and is necessary to develop a deeper understanding of the concern, the potential risk of harm to a child or young person and the action which may be needed.

Careful planning is important; those responding to the concern must be clear on **who** they need to speak to and **what** information they need to ask about. The temptation will be to gather as much information as possible but it is important to only ask about information that is relevant to the concern. This is important not only to ensure the confidentiality of anyone involved in the concern but also because gathering too much information that is not relevant to the concern can be overwhelming, time-consuming, and can result in important pieces of information being missed.

Information gathering:

- Speaking to the person who has raised the concern.
- Speaking to other adults who may have information related to the concern, for example witnesses to an incident.
- Speaking to the person whose conduct has been reported, if applicable. Advice should be sought from the police if the matter has been reported to them, or if the information suggests a risk is posed to another individual.
- Speaking to the child or young person with whom the concern relates to if appropriate. Careful consideration must be given to whether it is necessary to speak to a child or young person and to where and how this is done and who is present. For further guidance on speaking to children and young people please see Appendix 5 – Seeking the views of the child – click here for [Responding to Concerns toolkit - Appendices](#).
- Speaking to other children and young people who may have relevant information, if appropriate.



Whilst gathering information it is essential to keep an open mind and to not hypothesise or reach a conclusion without all relevant information. Those responding to concerns must **not be fixed on a particular outcome** and must always be questioning what the information is telling them.

Open and closed questions should be used when speaking to people who have been identified as potentially providing information which is relevant to the concern and any type of leading questions should be avoided. An open question is a type of question that generally cannot be answered with a “yes” or “no” answer. Open questions allow those being asked the question to reply in a more detailed manner. A closed question is a question which can always be answered and the question can usually be answered with a “yes” or “no” response. A leading question is a type of question that prompts the respondent towards providing an already pre-determined answer and usually the answer is contained in the question.

Example:

A parent calls to report to you that the head coach for the youth team was shouting and swearing at the young players during training on Thursday.

Open questions:

Tell me what happened at training on Thursday?

Describe the coach's behaviour?

What did they say?

Closed questions

Did the behaviour of the coach at training on Thursday cause you any concern?

Did anything happen at the training on Thursday which made you feel uncomfortable or upset?

Leading questions

Is it right that the coach was shouting at training on Thursday?

Did the coach swear during training on Thursday?

Did you feel upset by the coach's behaviour?

The use of a leading questions can potentially compromise the reliability and validity of the answer. As you can see from the scenario above, the use of open and closed questions does not give the person any indication about what response is expected from them, while the leading questions directs the person to a particular response. There can sometimes be a temptation to ask leading questions, especially if the person is not being forthcoming with information, however, this is where preparation and planning is necessary. Having a range of prepared questions prepared will help to draw out the information and encourage the person to provide an answer.

There are advantages and disadvantages to using both open and closed questions. When used appropriately both can be helpful in gathering information that is relevant to the concern and should be used in conjunction with each other. For example: A closed question can be used to pave the way for a more open questions. Using the scenario above:

Q: *"Did anything happen at training the other night which made you feel uncomfortably or upset?"*

A: *"Yes"*

Q: *"Tell me what happened during training?"*

Open Questions

Advantages

- Respondent can give you more detailed information
- You can gain a better understanding of the respondents thoughts and feelings
- You can gain insight into the respondents values and attitude
- It prompts the respondent to think more about what they saw/heard.

Disadvantages

- You can gain too much information
- The responses can be harder to analyse
- It can be harder for the respondent to answer if they are unsure or nervous

Closed Questions

Advantages

- It can be easier for the respondent to answer.
- You can tailor question to reflect what specific information you want to find out about the concern.
- Allows you to pick out particular facts relating to the concern
- Responses can be easier to analyse

Disadvantages

- It can force simplistic answers from the respondent and can therefore lack detail.
- Does not cover all possible answers and options and can therefore restrict answers
- It can suggest an answer that the respondent hadn't considered

Potential barriers to gathering information

Not everyone will be comfortable to talk about the concern or what they have seen or heard and some may be less forthcoming than others to provide the information which is required to get a clear understanding of what has happened and what is needed to appropriately respond to the concern. People may be reluctant to speak for a number of reasons and those responding to the concern need to be aware of these reasons why someone may be reluctant to speak them. This is important to not only see what can be done to remove the barriers but also in order to properly analyse the reliability and/or credibility of the information, which will be further considered in Stage 3 – Analysis.

There can be many reasons why people who **may** have information that is valuable to your assessment avoid speaking to you or give you limited information, this can include:

- Fear of repercussions, for e.g. their child not being selected for the team
- Not wanting to get involved, they consider it “none of their business, or their place to tell you”
- They are unsure of who you are and/or are not clear on what your role is and what you will do with the information they tell you
- They don’t want to get anyone into trouble
- They feel a sense of loyalty towards the person the concern has been raised about
- They are worried about their own conduct being challenged for e.g. why they hadn’t reported what they had seen before now

The best way to remove any barriers that may prevent people feeling like that can talk is to proactively build trusting and positive relationships with everyone at the club, including the children and young people and their parents/carers. In addition to proactively creating an environment where people feel like they can speak about anything which is worrying them, when responding to a particular concern the CWPO must:

- Always act impartially and fairly
- Always follow up on a concern
- Reassure the person about the potential implications/outcomes
- Reassure them about confidentiality and be honest about what you will do with the information and who you may need to share this information with

Recording Information

An initial consideration is to start a written record of the response. During Stage 2 the amount of information available about the concern will naturally increase and is vital that the record of the response is kept up to date and accurate.

The written record of response will be the main record of everything which has been done to appropriately respond to the concern. This record may be accessed by others, e.g. senior officials at the club/Association, the person who the concern has been raised about or against (should they make an official request to see this information) or shared with external agencies such as the police or social work, so it must be clear and concise and use only appropriate language. It should not include informal, judgemental or derogatory language, the only exception to this would be when recording the exact words used by a person. Further information can be found in Appendix 4 – Maintaining Confidential Records – click here for [Responding to Concerns toolkit - Appendices](#).

For every person who is spoken to in connection with the concern, it is best practice to keep a written note of what they have said. Where possible and appropriate, this note should be prepared in a way that it can be shared with the individual afterwards. The reason for doing this is to give them the opportunity to confirm that the information recorded is an accurate reflection of what they have said and gives them the opportunity to provide clarification on anything which may have been misunderstood. It is recommended that this is done by reading over the note rather than providing them with a copy of the note. This allows for this information to be kept confidential.

A template for recording information when speaking to a witness (Template 13 – Speaking to a witness) can be found here [Responding to Concerns toolkit – Templates](#).

As more information becomes available the person responding to the concern should continue to reflect and ask themselves the following questions:

- *Has the nature of the concern changed?*
- *Has the risk to the child increased, decreased or is still the same?*
- *Do I now need to share this information with anyone?*
- *Do I now need to consider a precautionary suspension? (if this wasn't considered necessary before)*
- *Is it appropriate to speak to the child to get their view?*
- *Do I need to find out more information? If so, who do I need to speak to?*
- *Do I have enough information to reach an outcome?*

Whenever these questions are considered or there is a change to the answer to any of the above questions, it is best practice to keep a written record of the decision and what has been taken into account in reaching this decision.

Concluding the information gathering stage

It can be difficult to know when to stop gathering information and to move on to the next stage of analysis. The temptation can be to gather as much information as possible, however, the confidentiality and privacy of any party involved in the concern must remain at the forefront of the response and information sought should only be as is necessary to reach a decision on the best outcome.

To prevent additional and unnecessary information being gathered those responding to the concern should ask themselves:

- *Do I have enough information to make a fair and impartial decision?*
- *Have I gathered information from all points of view?*
- *Have I spoken to relevant people who will be impacted by any decision I make? For example, if the concern is about the conduct of an adult, have you spoken to that adult?*
- *Will speaking to anyone else change the decision I may make?*

Stage 2 – Quick guide

Stage 2 – checklist

Stage 2 – Information Gathering	Yes	No	If no, why
I have spoken with the person who reported the concern to clarify all of the information regarding their concern.			
I have agreed timescales with the person who reported the concern and other relevant parties on when I will provide an update.			
I have decided who I need to speak to and what information I need to obtain from them.			
I have prepared a structured plan on how I will gather this information.			
I have spoken to the people I have identified as relevant to the concern to gather information, including the respondent.			
I have sought the views of the child or young person(s) (if appropriate).			
I have sought the views of other children and young people at the club if necessary and appropriate.			
I have sought the views of the child or young person's parents/carers if appropriate.			
I have made a record of the conversations that I have had as part of my information gathering and I have securely stored these records.			
I have provided updates to the relevant parties as agreed.			
I have considered the impact on the child/young person's wellbeing and I have offered appropriate support.			
I have sought advice from the Scottish FA Wellbeing and Protection team or my Affiliated National Association.			
I have shared any information that is necessary and relevant to safeguard the wellbeing of a child or young person.			

Stage 2 – Relevant Appendices and Templates

[Responding to Concerns toolkit - Appendices](#)

- **Appendix 1 – What is a Chronology?**
- **Appendix 2 – Common mistakes when responding to concerns**
- **Appendix 5 – Seeking the views of a child**
- **Appendix 6 – Timeline**

[Responding to Concerns toolkit – Templates](#)

- **Template 2 – Chronology**
- **Template 12 – Seeking the views of a child**
- **Template 13 – Speaking to a witness**

Stage 3: Analysis

Making sense of the information gathered through analysis is a key part of the response process. Analysis is the process of breaking down the information to acquire a better understanding of the concern and how best to respond. Gathering an abundance of information without fully understanding it is of little use. It is only through good use of analysis that those responding to a concern will gain a more informed and insightful understanding of the concern and the best outcome.

In our everyday lives we gather information and make an assessment on what information is relevant and what is not relevant. We consider what information we accept and what information we do not think is entirely accurate and/or truthful. We are constantly taking in information and holding onto information which is important and discounting information which is not. This stage is no different. The only difference is that this analysis should not be done based on our own thoughts, experiences or pre-conceptions but instead **must be approach in in a thought-out, impartial and consistent manner.**

The first step will be to review **all** the information which has been gathered. This information should then be grouped together based on information which is consistent or supports other parts of the information and separating out any information which suggests or points to a contrary point of view. This will allow for each piece of information to be assessed as to whether it is reliable and credible.

Reliable information is information which is consistently of good quality or performance and is able to be trusted. Factors to take into account when considering whether the information is reliable:

- *Is what is being reported based on facts or observations?*
- *Did this person directly see or hear something or are they relaying information from a third party?*
- *Were they in a position to directly see or hear something? e.g. How far were they from the incident? Were there any obstructions such as noise, other people in front of them? Was there anyone closer to the incident?*
- *Have other people given the same account?*
- *Is the person making any assumptions?*
- *Are their viewpoints or perspectives of an observation being interpreted differently?*
- *Is there the potential for any bias that has affected the information someone has given you, or how you are interpreting this information?*

Credible information is information which is able to be believed or is convincing. Factors to take into account when considering whether the information is credible:

- *Does the person appear genuine and honest when you are talking to them?*
- *Does the person appear to be open and trying to provide you with accurate and relevant information?*
- *Is the person consistent?*
- *Is the information believable?*
- *Is the information convincing?*
- *Does this person have an agenda or a vested interest in a particular outcome?*

Based on our own experiences, understanding and values it is likely that recollections of particular events, incidents or conversations will vary. This does not mean that a person is being untruthful, but rather they are approaching it from their perspective. It is the role of the CWPO, or any other person who is required to respond to the concern, to analyse this information and determine what is **more likely than not** to have occurred. More importantly, what that means in terms of the action which can or must be taken. No matter what decision is reached it must be justifiable based on the information which is available.

General questions to consider as part of your analysis:

- *Is what is being reported clear or do I need to go back and clarify any points?*
- *Are there contrasting accounts of the same incident?*
- *Am I making any assumptions about the information?*
- *Have I collected information that is not relevant to the concern that I can now discount?*
- *How does the information available affect the wellbeing of a child or young person?*

The final part of the analysis stage is to make a decision as to what has more likely than not occurred. This decision should be clearly recorded and the reasons for your decision should also be recorded. Once you have reached a decision on what the information is telling you then you will be able to move on to the final stage of the response process and determine what action, if any, you need to take.

There can be difficulties and challenges when responding to concerns and depending on the nature of the concern it can be upsetting and emotive for those who have the responsibility to respond and make a decision. It is important to know where to get support and who you can speak to in order to discuss any worries or questions that you may have. This can include talking through your analysis of a response and what action you think is appropriate to take.

You can get advice and support from:

- The Safeguarding Panel at your club
- Senior staff or volunteers at your club, e.g. board members.
- Your Affiliated National Association or League
- Other CWPOs
- The Scottish FA Wellbeing and Protection team

If you are seeking advice, it is best practice to anonymise personal information, e.g. the name of the child/adult, to respect confidentiality.

A template for recording a response to a concern (Template 10 – Record of Response) can be found here [Responding to Concerns toolkit – Templates](#).

Stage 3 – Quick Guide

Stage 3 – Checklist

Stage 3 – Analysis			
I have reviewed all of the information I have gathered.			
I have understood all of the information gathered and do not to go back and clarify any points with anyone I have spoken to.			
I have discounted information that is not relevant to the concern, or information that is hearsay or opinion based and is not substantiated by facts.			
I have considered what information I have that supports the concern and what information I have that doesn't support the concern.			
I have concluded that the information I have gathered is sufficient to make a determination in responding to the concern.			
I have concluded that I need more information to reach make a determination in responding to the concern.			
I have kept an accurate record of the information I have gathered and have securely stored this.			
I have provided updates to the relevant parties as agreed.			
I have considered the impact on the child/young person's wellbeing and I have offered appropriate support.			
Consulted with the relevant people or departments within your club for e.g. the board/committee or HR department.			
Sought advice from the Scottish FA Wellbeing and Protection team or your Affiliated National Association.			
I have shared any information that is necessary and relevant to safeguard the wellbeing of a child or young person.			

Stage 3 – Relevant Appendices and Templates

[Responding to Concerns toolkit - Appendices](#)

- **Appendix 2 – Common mistakes when responding to concerns**

[Responding to Concerns toolkit – Templates](#)

- **Template 10 – Record of Response**

Stage 4: Action

The final step in the process is to decide what action, if any, to take. All actions must be proportionate, fair and taken in the best interests of a child or young person/s.

Depending on whether the concern is about the wellbeing of a child or the conduct of an adult will depend on what action needs to be taken. There is no limit to the number of actions which can be taken to appropriately respond to the concern. For example, even if there is a formal discussion with an adult whose conduct has caused concern it may also be decided that further training is beneficial for all adults at the club is needed.

If the concern reported is about the conduct of a child e.g. bullying behaviour towards other children, then the outcome should be in line with the actions under 'concerns about the wellbeing of a child'. There may be some circumstances where the concern is both about the conduct of an adult and the wellbeing of a child because the conduct of the adult has had a direct impact on the wellbeing of a child or children. In these circumstances, you may need to take a number of actions to appropriately respond to the concern.

Concerns about the wellbeing of a child

Where the concern is about the wellbeing of a child or young person, the outcomes will vary depending on the **risk** to the child or young person and the support or intervention they require.

In some cases the analysis of the information you have gathered will lead you to conclude that no further action is required. This can happen when:

The facts do not substantiate concern – no further action

The concern has been successfully addressed by the child/young person, their parent/carers and/or club staff or volunteers and no further action is required

The decision may be that action is needed to ensure the wellbeing of a child/children at the club. This may include supporting the child/young person whose wellbeing has been impacted, but may also involve action in relation to a child or young person whose conduct has fallen before the standard expected. Regardless of the concern, a child centred approach should be taken. Even if the concern relates to the conduct of a child/young person any action must be in their best interests recognising that they are still developing and learning and should be supported to learn from the experience.

Child's wellbeing has been impacted and action is required:

- Club need to provide ongoing support to young person
- Further education for young person/young people required
- Formal action needs to be taken by the club e.g. suspension or released from team

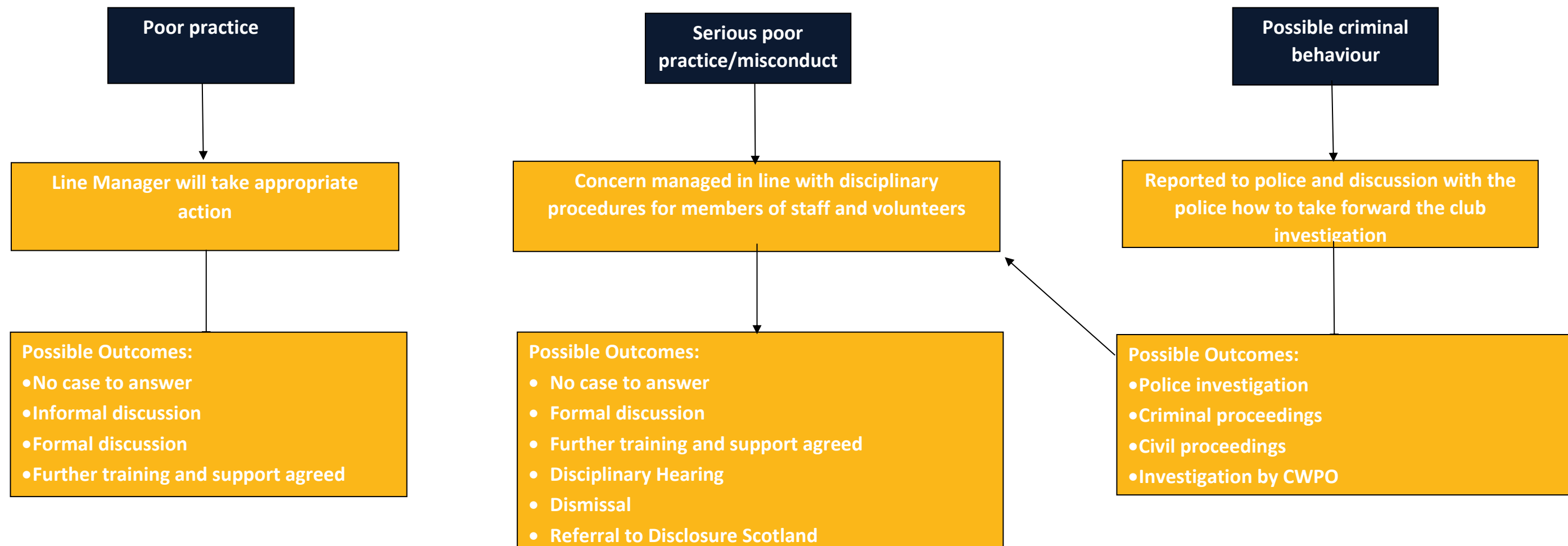
Unfortunately there may be a situation where the conduct of the child is such that they cannot remain part of the team/club. If this is the outcome then the decision should be conveyed to them in a sensitive and thought-out manner and in line with any existing protocol/policy around the release of a young person.

Even at this final stage consideration must be given as to whether there is a need to share the concern with any other person or agency, e.g. the child's parents/carers and/or the police or social work or school. If there is now information to suggest that the information should be then this must be done regardless of what other action has been decided.

Information must be shared with statutory agencies e.g. policy and/or social work, or a third party e.g. school or Named Person, due to the gravity of the concern.

Concern about the conduct of an adult

Where the concern relates to the conduct of an adult and the information supports a decision that their behaviour did fall below the standards expected of those working or volunteering with children and young people, there are a variety of options available. More than one may be appropriate and may include but is not limited to:



In some cases the analysis of the information will lead to the conclusion that no further action is required. This can happen when:

- The information gathered does not substantiate the concern

- The person whose conduct has been reported has recognised their poor practice and taken the necessary steps to address this.

Poor practice is behaviour and practice which falls below the standard expected by adults involved in Scottish football. This is behaviour which is not in line with the Set the Standards and does not meet the Wellbeing and Protection Values.

Serious poor practice or misconduct is behaviour and/or practices which falls significantly below the standard expected by adults involved in Scottish football. This is behaviour which is not in line with the Set the Standards and Wellbeing and Protection Values and could potentially be harmful to the wellbeing and protection of children and young people or others.

Making decision as to whether the conduct amounts to poor practice or is serious poor practice/misconduct will depend on the nature of conduct and impact of on child and there are no hard and fast rules as to what conduct would fall into each category. The determination will depend on the seriousness of the conduct and the impact, or the potential impact, the conduct has had, or could have on a child.

Criminal behaviour is behaviour which is contrary to the law. Criminal conduct may lead to a police investigation and subsequent criminal proceedings, however this does not mean that there will not require to be a response in order to properly risk assess whether the adult can continue to be involved in football activities. This response may be delayed until the conclusion of any police investigation and/or criminal proceedings and these circumstances advice must be sought from the police as to when it would be appropriate to start gathering information. A criminal conviction may be used as part of the information gathered and in these circumstances you may not need to gather any or much more information in order to move to the analysis and action stages, however, this does not stop you from gathering any further information which may be relevant to your assessment of risk. Even if there are criminal proceedings which results in the adult being acquitted, you will still need to conduct a full response to determine whether any action is necessary in terms of their involvement in football.

At the end of each response, it is important to reflect on whether lessons can be learned and if there is any further guidance or support in the club can put in place for children, and young people and/or club officials either individual or collectively. This could include specific training for an individual or training for a group of people e.g. a particular team, all club officials etc.

Stage 4 – Quick Guide

Stage 4 – Checklist

Stage 4 – Action			
Recorded the outcome of the determination you have made.			
Communicated the outcome of your assessment to the relevant parties.			
Carried out any action disciplinary action required as a result of your assessment.			
Reflected on the learning from the concern and if appropriate conducted a case review.			
Carried out any education / training as a result of the learning from the concern.			
Made referral to relevant agencies where appropriate, for example Disclosure Scotland.			

Stage 4 – Relevant Appendices and Templates

[Responding to Concerns toolkit - Appendices](#)

- **Appendix 3 – Information Sharing**

[Responding to Concerns toolkit – Templates](#)

- **Template 7 – Notification of a decision (further action)**
- **Template 8 – Notification of a decision (no further action)**
- **Template 10 – Record of Response**