

Appendix Two - RECOMMENDATIONS OF INDEPENDENT REVIEW INTO SEXUAL ABUSE IN SCOTTISH FOOTBALL - INTERIM REPORT

Recommendations:

1. The Review has noted with serious concern the role that homophobic attitudes and banter played in silencing young men who may have experienced sexual abuse in Scottish football. Any serious attempt to protect young people and reduce risk must therefore deal with this as a central issue in safeguarding and not as a separate silo which is exclusive to the field of Equalities and Diversity.

The Review recommends that the Children and Young Peoples Protection and Wellbeing team at the Scottish FA work closely with the Diversity and Inclusion Manager to develop and deliver effective joint strategies, approaches, materials and interventions to combat homophobia in Scottish football. A vital aspect of this is to reshape football culture so that barriers and obstacles to young people being free to discuss personal concerns and experiences including those concerning possible sexual harm are removed.

Should the Board of the Scottish FA accept and implement our recommendation to appoint a Director with responsibility for Safeguarding (see Recommendation 10) this person should also work closely at governance level with the Director holding the portfolio responsibility for Diversity and Inclusion.

2. The Scottish FA should give serious consideration, in partnership with the PFA and others, to identifying and appointing a prominent figure in Scottish football to act as a 'champion' for issues concerning the protection of young people; the needs of people affected by abuse and trauma; and wider mental health issues including through education; awareness-raising; public engagement and promoting key messages.
3. The role and influence of bystanders in both identifying and preventing sexual abuse is significant and this has been borne out in the personal accounts provided to the Review. 'Bystanders' include both peers and adults including parents.

The Independent Review recommends that the Scottish FA adopts a 'bystander approach' and integrates this into all awareness strategies and campaigns, training programmes, policies and procedures. In doing so the Scottish FA should draw on knowledge and experience from other areas where this has been applied including the work of White Ribbon Scotland and Mentors in Violence Prevention/VRU etc. and should, in the first instance, engage the support of Mentors in Violence Prevention in developing and embedding this approach within and across Scottish football.

4. There is substantial evidence to suggest that a number of young people have suddenly and unexpectedly left clubs as a reaction to sexual abuse but there has been no system of consistent due diligence for follow-up on the part of clubs. Sometimes this has been in relation to exceptional or highly promising players who cut short their playing careers but with no attempt by the Club to determine why. This should not be a commercially-driven response but one which is focused on understanding what experiences, concerns or issues have contributed to the decision of the young player and making available whatever assistance they might need.

We recommend that all clubs and academies, with the assistance of the Scottish FA and the relevant ANA's put in place proper processes of due diligence in all cases where young

players decide to cease participation or inexplicably move club....these processes should be focused on the welfare and safeguarding of young players and responding appropriately to unexplained/undetermined changes in behaviour or decisions to leave.

5. The Independent Review recommends that representations of 'vulnerability' in training, policy, public materials, campaigns and targeted intervention in Scottish football (and indeed in sport in general) should take full account of young people who do not conform to predominant stereotypes of 'vulnerability' especially in relation to how they may become exposed to risk of sexual abuse or exploitation in a football context. Care should be taken as to how 'vulnerability' and 'risk' are understood and communicated especially in any interactions with individual young people.
6. The Independent Review is acutely aware that it is likely that many people personally and directly affected by sexual abuse either in the past or more recently have not come forward. It is of vital importance that barriers, whether real or perceived, which militate against people coming forward to get help or seek justice or personal resolution are identified and removed.

The Scottish FA in partnership with other organisations such as the PFA should put in place measures, including information, training and development and accessible pathways to services which will create an environment of support and confidence capable of enabling and supporting any adult involved in Scottish Football who reveals past experiences or who wishes to discuss how sexual abuse or exploitation have affected them.

7. There is a critical issue generally about how non-recent occurrences of sexual abuse are understood within and across a football Club and not just by safeguarding staff or academy coaches.

It is recommended that all staff are made aware of how to respond both interpersonally and in terms of onward safeguarding to personal revelations of experience of sexual abuse. A 'trauma informed' approach might assist team members and staff to be more responsive and effective in helping each other and creating greater team cohesion as a result.

This particularly applies to 1st team personnel where adult players may wish to reveal previous experiences of abuse both within and outwith football and/or other personal issues or mental health problems and there is a possibility that this will not be understood or constructively heard either by other players/peers or by team staff.

8. Across Scottish football there is a need for clear and consistent leadership in relation to safeguarding of children and young people.

In the first instance a 5-year strategy for safeguarding should be put in place covering all aspects of safeguarding delivery and improvement and clear timescales for achievement of goals, objectives and outcomes. The Strategy should be developed by all constituents in Scottish football along with the Scottish FA and include the participation of young people and external partners. Accountability for the strategy should lie with the SFA and its Board as the governing body.

Measurement of the effectiveness of the Strategy should be based on outcomes not outputs.

9. To accompany the 5-year strategy, a communication strategy should be developed and put in place to ensure buy-in and the full commitment and participation of everyone involved in Scottish football.
10. Safeguarding of children and young people carries a high degree of 'organisational risk' and should therefore be a clear and priority aspect of governance within Scottish football. The Board of the Scottish FA should therefore appoint a Director with a portfolio lead for the safeguarding and wellbeing of young people and do so as a matter of priority.
11. All Board Members should undertake targeted but comprehensive safeguarding training either retrospectively or as part of induction commensurate with the governance and strategic leadership functions of the Board of a Sport Governing Body. Their ongoing needs for supplementary training and development should be included in the training and development pathway (see Recommendation 28).

12. The SFA should take steps to establish an independent Safeguarding Advisory Group to both advise the SFA and its constituents on safeguarding development, policy and strategy and to act as a mechanism for overseeing and monitoring continuous improvement in the protection of young people and the reduction of risk in Scottish football.

The Safeguarding Advisory Group should as a matter of course ensure that young players are consulted on safeguarding policy and delivery and that people personally affected by abuse in Scottish football are similarly consulted on all relevant matters.

The Safeguarding Advisory Group should also comprise members from outwith football and be chaired by a person independent of football with a high level of safeguarding expertise.

13. The SFA Handbook should be updated to include a section on 'safeguarding young people' containing the requirements related to standards and required compliance. The contact details of safeguarding officers in clubs, ANA's and the SFA should also be included within lists currently provided within the Handbook.
14. Concern exists as to the status and relevance of the ILS in relation to Scottish Football, specifically the relevance to Scottish legislation, social policy and organisations including the SIS standards. A review of this should be undertaken jointly between the SFA, The ANAs, sportscotland and the SiS (Children 1st).

In the development of a National Strategy for Safeguarding in Football the Scottish FA should determine the strategic purpose and desired outcomes from continued application of the ILS.

15. The safeguarding capacity of the Scottish FA should be subject to increased and improved investment and resourcing on a longer-term basis. This should include an expansion of current staffing and resources.

The Review recommends that the SFA conduct a comprehensive review of the desired and appropriate roles and tasks of the safeguarding team based on desired outcomes and the content of the 5 Year Safeguarding Strategy including: -

- Young people's participation and children's rights

- Training and development
- Compliance/quality assurance and evaluation
- Policy
- Consultation and support for affiliates, clubs and members

Amongst other things the Child Wellbeing and Protection Manager should be equipped and tasked to oversee the management of these services; direct and oversee the implementation of the Safeguarding Strategy; work with internal and external stakeholders and partners on continuous improvement of safeguarding practice within Scottish football; oversee the measurement of improvements and changes and report accordingly; and ensure current research, policy developments and legislation at all times inform the delivery of safeguarding within Scottish football.

16. Greater prominence and effectiveness should be ascribed to the Child Wellbeing and Protection Team in the Scottish FA. Positive consideration should be given to creating and tasking a Safeguarding Department within the SFA headed by a Safeguarding Manager and with a more direct line of responsibility to the Chief Executive Officer.
17. Consideration should be given by the Scottish FA to appointing 'regional' safeguarding development officer/s to deliver ongoing support, advice and to supplement capacity for clubs across grassroots and professional clubs. The focus of this role should be on development and as a way of effectively responding on the ground to the needs of clubs for advice, support and resources to improve their delivery of safeguarding and to make the right decisions to protect young people and reduce risk.
18. Commercial sponsors should be made alert to safeguarding issues and arrangements in the Scottish FA, ANA's and Clubs as part of their ethical and social responsibility agenda concerning investment and sponsorship.

As such any activity to attract sponsorship, investment and funding should factor in the efforts and achievements of Scottish football in ensuring the protection and wellbeing of young people in all aspects of the game to reinforce investor confidence.

Where possible commercial sponsorship should be sought for individual safeguarding projects or initiatives within a clear framework of ethical investment in the game.

19. The Review recommends an urgent review of the SFA affiliate membership structure is undertaken with a view to reform. This should place centre-stage the need for lines of accountability to be clear, concise and transparent and demarcation of responsibilities in safeguarding of children and young people to be exact and clearly defined.
20. In senior professional clubs the Safeguarding Officer role should not be an "add-on" to other functions/roles within clubs but should be a dedicated salaried post within the club. In clubs with youth academies and/or active community programmes and outreach work the Review recommends that these posts be full-time.

Serious consideration should also be given where relevant to clubs appointing to such a post on shared basis (particularly in relation to smaller clubs who may face particular challenges balancing requirement with resources).

21. Safeguarding Officers should be visible across all club functions, events and activities concerning children and young people's participation and competition including interface

with parents. Club Safeguarding Officers should be identifiable and visible at all events where they are present or have a role. This should include making themselves known to everyone involved in the Club (parents, players, coaches, staff, etc) on an ongoing basis. Some Club Safeguarding Officers wear clear identifiers such as branded clothing, badges etc so consideration should be given by all clubs to adopting similar practices.

22. The details of club Safeguarding Officers should be prominent throughout all relevant documents including 'public facing' literature. Club handbooks should clearly and accessibly include the names and contact details of designated Safeguarding Officers and their duties/deputising arrangements. These should be routinely updated.
23. Clubs must ensure that Safeguarding Officers and others charged with safeguarding responsibilities are easily accessed. This should include ensuring that safeguarding information is clearly and easily identified on websites and ensuring all 'front of house' staff can route calls and enquiries to the relevant person for prompt attention. All automated options menus on switchboards should include the Safeguarding Officer for the club with clear instructions and arrangements for messages to be left.
24. There should be a standard core role and person specification for Safeguarding Officers across all clubs which make clear the requisite expertise and knowledge base for undertaking this role. Club Safeguarding Officers should be recruited and appointed on the basis of their knowledge, skills and experience in relation to the safeguarding of children and young people and not solely on the basis of their previous broad professional or occupational roles outside of football.
25. The Review recommends that the Scottish FA with assistance from partner agencies develop a comprehensive but applicable framework for making decisions in relation to initial assessment and discernment of reported concerns.

This is to ensure that there is not a 'one size fits all' response and that concerns are dealt with proportionately based on what is known and what is discerned in the first instance. The handling of concerns is often delicate and should not be reduced to a painting by numbers which is procedurally driven (often denoting a back-covering rather than focussing on the protection of young people and the reduction of risk).

The framework should be viewed as a tool and like any tool it is only effective and purposeful in the hands of those confident and competent to use it.

The framework then should be subject to refinement ongoing but underpinned by a training and development regime which continually improves the skill, knowledge and confidence to apply in practice.

26. A Safeguarding Training and Development Strategy for all of Scottish Football should be developed jointly between the SFA; ANA's; Clubs (Professional & Grass Roots); and involve external partners such as Children 1st and sportscotland.
27. A Safeguarding Training and Development Quality Assurance system should be developed and implemented which ensures that training and development programmes have positive outcomes in the continuous improvement of safeguarding in Scottish football.

28. A Safeguarding Training and Development Pathway should be developed which identifies the needs of *all* roles and categories of those involved in football in Scotland; how these needs should be met; what is mandatory and what is 'optional' according to the role/post/need etc. as a means ensuring training and development is both proportionate to need/role and strategic in terms of delivering desired outcomes.

The Pathway should also take account of training and development needs arising from appraisal and what needs to be delivered or accessed in an ongoing way.

29. All induction for staff, volunteers, board, management and players across Scottish football should include input on safeguarding (as reflected in the Safeguarding Training Pathway at an appropriate and proportionate level).
30. The Review recommends that the 'Standards for Child Wellbeing and Protection in Sport' are embedded into a Safeguarding Strategy for Scottish Football and any evaluation regime with a view to ensuring that any achievement and progress in the arrangements for protecting young people and reducing risk is measured against the Standards on an ongoing basis.
31. All 'managing concerns' reviews should be undertaken after every concern case as part of a self-evaluation process within each club. The results of each review should be communicated to the Scottish FA who should hold responsibility for analysing these and integrating them into an overall assessment of safeguarding practice and improvements.

Self-evaluation tools and processes should be developed and used within clubs and ANA's in relation to the discharge of other safeguarding responsibilities and requirements and results communicated to the Scottish FA.

32. The Scottish FA in conjunction with clubs and others should develop or provide a proportionate programme of awareness for parents and caregivers about how sexual abuse or exploitation occurs and how grooming might be carried out including how parents and adult bystanders might also be groomed.

Such awareness should be proportionate, informed and accessible and form an important focus for partnership and good communication between the Scottish FA, clubs and parents/caregivers.

33. All club safeguarding policies should have an introduction from CEO/Board Chair or both.
34. Clubs should not simply adopt and rebrand the SFA Child Wellbeing Handbook or any other template policy or procedure without doing more to ensure it is integrated into the identity and delivery of the club itself. There is a need for clubs and organisations to 'bespoke' policies to their individual clubs needs and conditions without compromising the consistency of core requirements across Scottish football.

The Review recommends that all clubs and organisations revisit their documents and policies to ensure that the structure and identity of their club is clear and consistent throughout with the branding and ownership of the policy clear in their presentation and the delivery. All such policies and procedures should clearly reflect the vision and values of the particular club and its community.

35. Terminology and nomenclature across all clubs ANA's and organisations within football should be consistent and include consistent definitions of what is meant.

36. To prevent confusion and promote consistency all safeguarding policies should be known by the same title across all clubs and organisations.
37. The definition of 'child' should be clarified and consistent across all safeguarding policies and processes in Scottish football.

The Review is acutely aware that many young people participating in Scottish football do not identify with the term 'child' and indeed feel that it is a misrepresentation. Whatever legal definitions are used it is important also to ensure that young people themselves fully identify with policies and processes in place for their protection and therefore terminology needs to be adjusted to ensure this is possible.

38. The Scottish FA should refer to the spirit of the 'relationships and position of trust' legislation with a view to broadening the 'relationships' definition within organisation and club policies and handbooks. Clubs, with the assistance of the Scottish FA, should also ensure that this is reflected in Codes of Conduct for particular roles.
39. Club Policies and Procedures should directly and explicitly make clear that they apply to all children and young people participating in club activities and delivery in any way, not just young players.
40. Reporting and management of concerns processes should be standard, simple, and clearly set out in all Safeguarding Policies.
41. Consideration should be given to making club and organisations safeguarding policies/handbooks as user-friendly as possible - this should include separating out recruitment materials (e.g. codes of conduct; application forms etc) from the core handbook.

Where clubs have Football Academies operating within or attached to them (and this is especially relevant following the implementation of the Project Brave reforms) it is important that the arrangements and policies of the Academy are covered by the policies and processes of the 'parent club.'

Club Football Academy safeguarding processes, policies and procedures should not be separate from club processes, policies and procedures. The Club Policy should overarch and inform all delivery across the Club concerning protecting young people and reducing risk including the Football Academy.

42. Consideration should be given to the development of a template or standard 'Terms of Reference' to assist any club who may wish to embark on internal review related to specific safeguarding concerns or allegations whether recent or non-recent.
43. No section in any policy should be titled 'Protecting Yourself from Allegations of Abuse'. Where this is the case this should be remedied immediately by clubs and organisations. The Review recommends that the term 'Safe Working Practices' is adopted instead and that the content of such policies is made consistent with this term.
44. Safeguarding children and young people on and through social media should be included and embedded in club and organisations safeguarding policies across Scottish football.

45. Standards of expected communication and behaviour on social media (whether towards young people or adults within football and outwith) should be included and clear requirements set in all Codes of Conduct at all levels in football including in the professional game and including communication by club players and staff with young people outside of football.
46. 'Stand-alone' social media safe practices and guidance for Academies and Youth Football should be developed and put in place.
47. The Scottish FA should conduct a review of the arrangements for photography, visual recording and video analysis concerning young players in all settings across Scottish Football including the regulation and monitoring of this and the use and storage of photographic/recorded images of young players with a view to developing and putting in place consistent standards and practices.
48. The Scottish FA should draw up guidance on risk assessment (Including processing blemished PVG reports) for all clubs and covering the makeup, responsibilities and expertise/training of risk assessment panels.
49. Consideration should be given to centralising Risk Assessment functions on behalf of clubs and ANAs including referral to the List; critical cases; liaison with investigatory authorities; and developing a single 'clearing house' /process discernment for all blemished disclosures and cases of concern through a single, central system/mechanism invested with the right expertise and supported by procedures and processes that are proportionate and fit for purpose.
50. Consideration should be given to grassroots football clubs sharing risk assessment capacity, perhaps on a district/regional basis as part of the consideration of centralising these functions.
51. The Scottish FA should undertake a comprehensive review of roles and posts across Scottish football to clarify categorically those which require PVG checks and those which don't in terms of current legislative provision and the definition of 'regulated work'. Where anomalies or contention arises as a result of such a review, the Scottish FA should, on behalf of Scottish football, enter into discussions with the Scottish Parliament and Disclosure Scotland (as the relevant arm of Government) to address and rectify these promptly and clearly. Confusion or lack of clarity about 'regulated work' and how it applies to those engaged in the delivery of football in Scotland should be eliminated.
52. Where notification of an individual for listing to Disclosure Scotland is a possibility, consideration should be given to this being undertaken through a single 'clearing house' within Scottish football so that individual cases are tracked and subject to consistent processes and to facilitate statistical reporting and analysis.
53. The Review recommends that the Scottish FA scopes existing provision for safe recruitment training in Scotland and thereafter ensures that all recruitment and appointment processes reflect expected standards of safeguarding. Consideration should be given to relevant HR

staff undertaking safe recruitment training so that this features prominently in the execution of HR tasks and roles.

The Review further recommends that all recruitment/appointment panels should comprise at least one member who has successfully undertaken relevant and accredited safe recruitment training. Where applicable consideration should be given to the practicalities of extending such safe recruitment standards (beyond PVG checking) to the recruitment of volunteers.

54. Anyone acting in the capacity of 'safeguarding lead' for the purposes of squad/team trips should be properly trained and equipped to carry out the identified functions and responsibilities of the safeguarding lead working closely with the squad/team manager.

Safeguarding leads should be required to submit a report at the conclusion of every squad or team trip which should be held by the relevant club. Where incidents form part of this report the report should also be copied to the Scottish FA who will keep an overview of incidents and how these have been handled. The club must ensure that any incidents are subject to proper review as part of the process for 'managing concerns'.

55. All arrangements for squad or team trips should be properly risk-assessed in advance, including accommodation, travel, supervision of young people, etc.

56. The Review has substantial concern that adults in the past have been able to function within Scottish Football under a variety of guises simultaneously. The task or role for which they have ostensibly been engaged has allowed them to become 'peripatetic' and gained them 'access all areas'.

There is an urgent need for a clear and consistent definition of all roles within football and checks and balances to be put in place to ensure roles are adhered to.

The Review recommends that a full review of *all* roles in football is undertaken with a view to these being clearly defined and demarcated so that a proper system can be put in place which reduces the possibility for people to hold multiple functions without due consideration and overall accountability being held by the club or organisation itself.

The Review recognises the need for some flexibility particularly in grassroots football but this must be balanced with sufficient rigour and vigilance to ensure individuals are not able to expand their range of activities or engage in functions with young people beyond those for which they are trained, qualified, engaged or permitted before or unless they satisfy processes that formally allow them to do so (including and beyond personal recommendation and Disclosure checking).

57. The Review has concern about the provision of physical remedial or 'therapeutic' interventions with young players. We recognise that in professional clubs, physiotherapy will strictly be delivered by trained, qualified and registered physiotherapists. In grass roots football injury or suspected injury will (or should be) dealt with by qualified and trained First Aiders until proper medical attention is given.

However, when young players have or complain of sore or exhausted limbs or minor aches during training or play, the Review has concerns as to what type of treatment is administered, what the conditions and arrangements are for this and who is permitted to provide this. The Scottish FA should scope and review this issue comprehensively with a view

to developing and putting in place a full protocol governing these circumstances across Scottish football for under 18s.

58. The SFA in partnership with Clubs should conduct a full review of the arrangements for young players (U18) visiting or coming to reside in Scotland for trials or to play. This is with a view to ensuring consistency and compliance across Scottish Football including transport, chaperone, accommodation, support, integration etc. Where such players are to return to their country of origin, an exit strategy focused on their wellbeing and support should be put in place with the responsibility placed on the host club to implement this.
59. The Scottish FA in partnership with clubs should conduct a full review of recruitment, designation, training, and support of 'host families' for young players, ensuring consistency and compliance across Scottish Football.
60. The Scottish FA along with clubs should identify best practice for the recruitment, management and monitoring of football scouts to be agreed and implemented across Scottish football. This should be with a view to developing a standardised protocol governing the activities of scouts including a conduct and complaints/disciplinary procedure. Football scouts should be subject to consistent accreditation and their identities published on club websites so that other clubs and parents can readily check their credentials. Similarly, they should always carry identification from their club which verifies their role.
61. The Review understands that it is common across clubs for scouts to be prohibited from having direct and unsupervised contact with young players. The Review recommends that this requirement is made standard across Scottish football and protocols devised and put in place accordingly.
62. It is recommended that a joint review should be conducted between the Scottish FA, the PFA and other relevant parties of the role of intermediaries in relation to young players with a view to agreeing and putting in place a system of regulation to satisfy proper safeguarding standards. Serious consideration should also be given to the appropriateness of intermediaries representing young players.

The Review recommends that minimum requirements for football intermediaries operating in Scotland be introduced in any case. These should include a system of registration, PVG checks and a code of conduct.

Should intermediaries be permitted to continue to represent under-18 players the Scottish FA in relation to mandatory PVG checks should enter into discussion with Disclosure Scotland with a view to making this possible through changes to the definition of 'regulated work'.

The view of the Review overall is that, as far as we have been able to determine, there appears to be little justification for intermediaries to represent players under the age of 18 at all.

63. The Scottish FA should conduct a review of arrangements and protocols concerning clubs use of local premises or leasing from other bodies such as Local Authorities; private or community facilities. This should determine security arrangements to protect young players as well as clarifying responsibilities and accountability for risks. This should be with a view to

producing a simple framework for assessing risk prior to leasing or usage of non-club, third-party premises/facilities.

64. The Review recognises the improvements to the security arrangements of buildings and pavilions across Scottish Football. We also recognise the difficulties faced, particularly in grassroots football, in monitoring and staffing all premises at all times in a way that guarantees proper ratios and supervision of spaces.

The Independent Review recommends that the Scottish FA and clubs jointly develop a framework for 'situational prevention' of sexual abuse in Scottish football. This should include a review of arrangements for premises access, adult and young person ratios, security safeguards, safe working practices etc. towards the improved management of safe spaces and environments in football where young people are involved.

65. Safeguarding responsibilities and actions concerning the protection of young people and the reduction of risk should be addressed in security contracting agreements and in pre-match briefings.
66. Safeguarding policies/procedures should be accessible and presented in a way that is appealing and available in a variety of formats for immediate access and display. The Scottish FA and Clubs where possible should consider the use of apps and other platforms to host relevant information for users, staff and the general public.
67. Detailed attention should be given by the Scottish FA and clubs to website content to ensure that all safeguarding information and material is current, prominent, clear, accessible and easily navigated. This should also include a visual representation of accountability within club structures (such as a simple organogram).
68. There is a superfluity of material and documents on safeguarding across Scottish football - this is often/sometimes confusing, duplicative and contradictory. Individuals and Clubs therefore become confused about accountability and responsibilities.

The Scottish FA together with clubs should take measures to ensure that all policies, documentation, procedures and protocols are properly codified and simplified to ensure accessibility and ease of understanding and use across all organisations and clubs. Extraneous and obsolete information, policy and guidance should be removed and one simple, straightforward suite of safeguarding information and policies provided. A continuous common updating process should also be put in place.

69. The protocol for information sharing between the constituent parts of Scottish football and the Scottish FA requires further refinement and clarification so that it provides an effective, accountable and proportionate way of dealing with safeguarding matters and concerns. This must include provision of secure and confidential processes and systems for transmitting and storing information.
70. The Scottish FA should review arrangements for sharing of information between sports. This should be done in consultation with sportscotland with a view to putting in place improved mechanisms which fully take account of the role of Disclosure Scotland and Listing/Barring processes.

71. It is recommended that the Scottish FA and its affiliate members and clubs review all processes for the handling and management of complaints where these are about the way safeguarding matters have been dealt with a view to ensuring that an effective, transparent and consistent complaints process is put in place within all clubs/organisations. This should also address how a complaint is to be progressed if it is related to anyone who might ordinarily be charged with the responsibility to deal with the complaint.
72. The Review recommends that the level of criteria for safeguarding by clubs in relation to club licensing should be raised.
73. Licensing staff at the Scottish FA should be trained in safeguarding proportionate to their needs as identified in the Safeguarding Training Pathway (see Recommendation 28).
74. In the conduct of club licensing processes and examining club's compliance and 'fitness' to meet required standards, licensing staff at the Scottish FA should engage and utilise the expertise of SFA safeguarding staff to assess /agree compliance of clubs for licensing purposes. Similarly, mutual support and advice should be provided in the conduct of safeguarding auditing functions.
75. The Licensing Committee should receive appropriate training and ongoing information on safeguarding to ensure its decision-making is proportionate, informed and effective. Their training needs should also be identified and proportionately met through the Safeguarding Training and Development Pathway (See Recommendation 28).
76. The Scottish FA should undertake (along with relevant parties) a full review of record retention policies and practices across Clubs/ANAs/SFA with a view to ensuring that this is commensurate with the needs and requirements of cases arising concerning alleged non-recent abuse and compliance with current legislation on data-protection and record retention. This should apply to all records including, but not exclusively, employee and volunteer records.
77. In improving processes and structures for safeguarding young people and reducing risk the Scottish FA, clubs and organisations should pay due regard to the interface between safeguarding practice and delivery and the functions and responsibilities of Human Resources leading to improving accessibility and communication between these two functions within organisations and clubs.
78. In responding to and considering cases of 'non-recent' alleged or suspected sexual abuse, the role of HR directors in collating relevant information is critical - particularly past employment/volunteer records; financial and payroll records etc.

The Scottish FA and clubs should review and improve HR processes and ensure that these are fit for purpose. Safeguarding training or development issues for HR Personnel should be properly assessed and their needs addressed through their inclusion in the Safeguarding Training and Development Pathway (see Recommendation 28).

79. A standard role/person specification for coaches engaged in coaching players under the age of 18 should be developed and put in place.

80. An agreed Ethical Framework for coaching activity with under 18s in Scottish football should be developed and put in place and this should form the basis for the coach Code of Conduct.
81. The SFA with partners should review coach recruitment practices across all levels of Scottish football with a view to aligning these with safeguarding processes across the board. In reviewing, the Scottish FA should also take into account 'informal' identification and recruitment of coaches in order to develop a workable system for many grassroots clubs which should be more explicit, accountable and auditable.
82. Recruitment and appointment of coaches with young players should also include an 'assessment' of the values and attitudes of candidates in relation to children and young people and their diverse needs and based on the Ethical Framework (see Recommendation 80).
83. Coaching development programmes in Scottish football should be amended to ensure a focus on the needs, abilities, inclusion, potential, skill, knowledge, rights, and protection of children and young people participating in the game at every level. The training and development framework for coaches therefore should equip coaches to respond *holistically* to individual children and young people as well as groups and to ensure that they are effective in communicating with children and young people.

The conclusion of the Review is that effective mentoring, motivation and learning are predicated on this approach and not simply on the coaches footballing knowledge, skills or experience. The Review recommends that the SFA along with relevant constituents should review coach education to ensure that all programmes reflect this in both content and delivery.

84. Coach education and assessment should also assess how coaches/trainee coaches interact and communicate with young players as part of periodic or ongoing accreditation.
85. Those with responsibility for coach education should explore the best ways of helping coaches communicate effectively with young players thereby improving their capacity to protect and safeguard them as well as develop them as individuals and as players. Consideration should be given to promoting and extending the use of body-worn camera equipment as a professional development tool for coaches with under-18s to monitor and improve their interactions with young players. The use of such technology should be subject to strict protocols and oversight.
86. The Scottish FA should conduct a full review of independent/freelance football coaching activity in Scotland with a view to developing a regime for proportionate regulation and monitoring including codes of conduct, compliance, coaching standards and PVG checks.
87. Safeguarding principles and practice should be a central and prominent aspect of club football academies and the academy structure in Scottish Football. The Review recommends that the level of criteria for safeguarding by club academies in relation to the awarding of performance/elite academy status should be raised.

88. CAS staff charged with the responsibility to conduct audits of academies or clubs applying for performance/elite academy status should receive proportionate training in safeguarding young people and reducing risk. Their training and development needs should be agreed in accord with the Safeguarding Training and Development Pathway (see Recommendation 28).
89. It is recommended that, in considering awarding club academy status, Club Academy Scotland will engage and utilise the expertise of Scottish FA safeguarding staff to assess /agree compliance of clubs.
90. All Football Academies should consider establishing a Young People Council or an equivalent mechanism to facilitate the participation of young people across club and academy delivery (not just concerning safeguarding issues) including peer support, mentoring, consultation, and any policy matter affecting them etc.
91. The Scottish FA and its constituents should undertake further and regular participation exercises with young players in partnership with the Scottish Children's Parliament so that their views and perspectives are embedded into all plans and measures to improve the safety and wellbeing of young footballers ongoing.
92. The Scottish FA should immediately review the arrangements in place for enabling access to services by people affected by sexual abuse in football with a view to developing a process for receiving and managing future allegations of non-recent sexual abuse in football centred on the needs of the individual as well as the proper processing of information and assessment of risk. This should include the right approach to confidentiality and the capacity to enable individuals to access the right services and exercise choice in doing so.
93. The Scottish FA should commission and retain a professional service to undertake assessment of the needs of those coming forward in future and thereafter, as required, to provide ongoing support and mental health programmes of help/care if these are appropriate and desired. The cost should be included in the reconsideration of investment and funding of safeguarding in football (See Recommendation 12). Indeed, this arrangement should extend beyond people affected by sexual abuse in football to anyone involved in the game who experiences difficulties with mental health. Where appropriate, this should be addressed and developed with relevant partners within and/or external to football such as the PFA and others.
94. The Independent Review recommends that the Scottish FA and clubs and organisations in Scottish football consider the establishment of a permanent testimonial to the experiences of and impact on those affected including consideration of the creation of a fund which might underwrite support and assistance for those who have been personally affected by sexual abuse in Scottish football and indeed those in Scottish football who are experiencing other mental health challenges and issues. The Review sees no reason why this might not also be contributed to or underwritten by commercial donation and sponsorship.
95. A range of clear and simple information and material on child sexual abuse prevention should be visible and included on the Scottish FA and club websites and across training and policies - this should include signs in adult behaviour that may indicate concern and how to

respond to this; sources of help to change/make safe adult thinking and behaviour; actions that bystanders can take to intervene to prevent abuse from occurring, to reduce risk, and to protect young people.