



Scottish Canoe Association
Comann Curach na h-Alba

Procedure for Responding to Wellbeing and Protection Concerns

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Last updated by: Head of Coaching and Development (AJM)

This procedure applies to SCA led activity, for example related to the Performance Programme, SCA organised events, Level 4 sanctioned events and other activities.

It also applies to SCA Affiliated Clubs unless an equivalent procedure is in place (e.g. one within the remit of a university, college, multi-sport club).

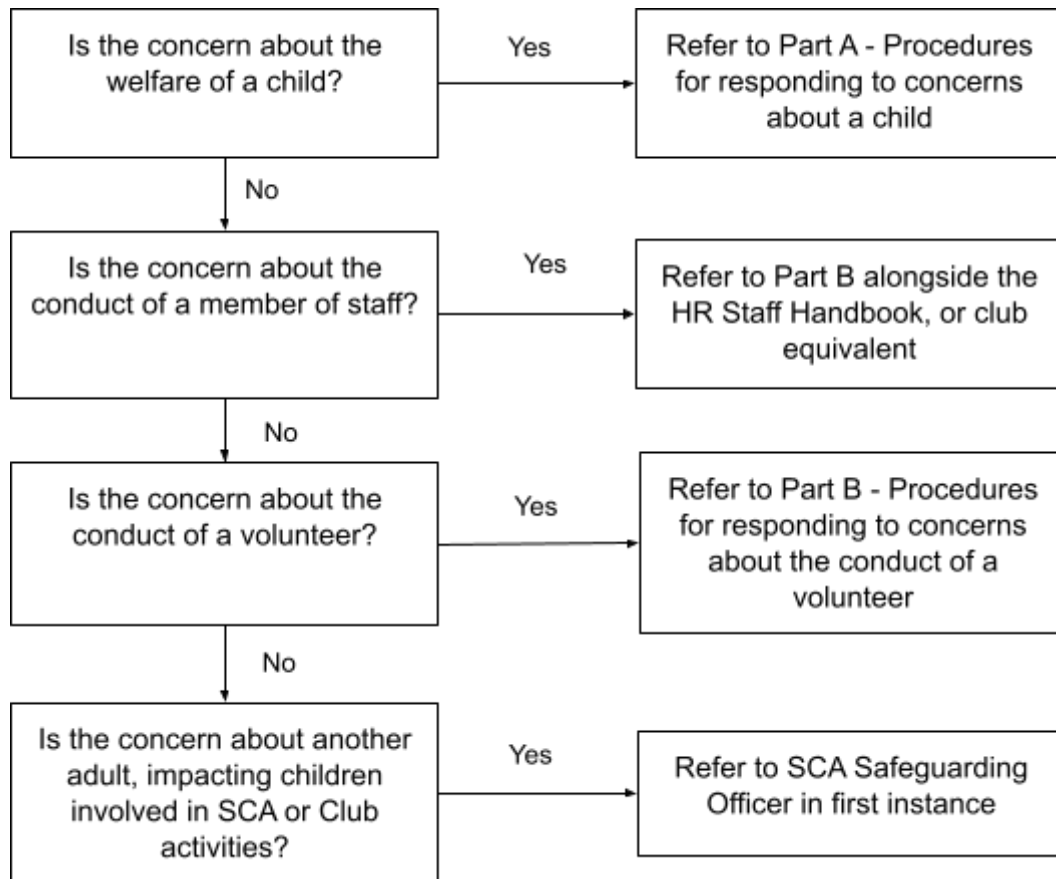
This document is principally aimed at Club Child Wellbeing and Protection Officers and SCA Staff who may be involved in responding and managing concerns. Separate briefer guidance is available for the wider audience.

This document has been prepared with expert input from Child Wellbeing and Protection in Sport Service operated by Children 1st following best practice guidelines and informed by latest case reviews from within Paddlesport and across the wider sporting sector.



Summary	3
Why is this important?	3
Principles underpinning responding to child wellbeing and protection concerns	3
Ways a child wellbeing or protection concern may arise	4
When faced with a child wellbeing or child protection concern, always:	4
Definitions	5
Low Level Concerns (Niggles)	6
Part A - Responding to Concerns about a Child	7
A.1 Concerns about the Wellbeing of a Child (A Child Wellbeing Concern)	8
A.2 What to Do if a Child Tells You about Abuse (A Child Protection Concern)	8
A.2a Respond	9
A.2b Record	10
A2.c Report	10
A.2c Sharing Concerns with Parents	10
A.2e: Peer on Peer considerations:	10
Part B - Responding to Concerns about the Conduct of a Member of Staff / Volunteer	12
Concerns about the Conduct of a Member of Staff or Volunteer	13
B.1 Initial Reporting of Concerns	13
B.2 Recording	14
B.3 Conducting the Initial Assessment	14
B.4 Precautionary Suspension	17
B.6 Initial assessment supports concerns about poor practice and/or misconduct (not of a criminal nature)	18
B.7 Initial assessment identifies the concern as a Low Level Concern	18
B.8 Initial assessment supports concerns about possible criminal behaviour	19
B.9 Disciplinary Investigation	19
B.10 False or Malicious Allegations	19
B.11 Non-recent Allegations of Abuse	20
B.12 Self Reporting	20
B.13 Media	20

Summary



Why is this important?

It can be very difficult to know what to do if faced with a concern about a child or young person, especially if the concern involves someone you know. This procedure ensures that everyone in your club is clear on what action to take in the event of a child wellbeing or child protection concern. It gives volunteers and members of staff clear, important steps to follow, ensuring action is taken quickly and in the best interests of children and young people.

Principles underpinning responding to child wellbeing and protection concerns

- The wellbeing of the child is the paramount consideration.
- Parents/carers have the primary responsibility for the safety and wellbeing of their children and where possible the club should work in partnership with parents/carers when there are concerns about a child or young person.
- Children have the right to say what they think in all matters affecting them and to have their views taken into account (Article 12, UNCRC). It is important therefore to seek the views of the child or young person and, where relevant and appropriate, to seek their consent for further reporting of the concern.

- Where the concern about a child or young person's wellbeing suggests that they are in need of protection, the information must be passed on to police/social work with or without the child's consent for the purposes of their protection.
- Allegations of abuse must always be taken seriously. No member of an Affiliated Club or the Scottish Canoe Association shall investigate allegations of abuse or decide whether or not a child or young person has been abused.

Ways a child wellbeing or protection concern may arise

A concern about a child may come to the attention of an adult in the sport through a number of different ways:

- a direct disclosure by a child
- through observation of a child, demonstrated by a change in their behaviour, appearance or nature
- information that is shared by another individual (adult or child) or organisation.

When faced with a child wellbeing or child protection concern, always:

Respond Record Report

Definitions

<p>Low Level Concern (Niggle)</p>	<p>A concern or allegation that does not meet the harm threshold. The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working/volunteering with children may have acted in a way that:</p> <ul style="list-style-type: none"> • is inconsistent with an organisation's code of conduct, including inappropriate conduct outside of work; and • does not meet the harm threshold; or is otherwise not serious enough to merit a referral to statutory agencies. <p>A behaviour niggle can also be when a young person has displayed challenging behaviour which has impacted on them, volunteers, staff or other young people. Behaviour is communication and usually challenging behaviour is a sign that something is going on in that young person's life.</p>
<p>Child Wellbeing Concern</p>	<p>Concerns which, in isolation, do not always meet the threshold for a child protection referral to social work or police but still have an impact on the wellbeing of the child or young person and require attention. <i>Examples may include: bullying, mental health concerns, bereavement, family separation and self-harm or parents pushing their child too hard in sport.</i></p> <p>There may also be scenarios where a volunteer or member of staff could have an impact on the wellbeing of a child or young person due to their poor practice. Examples may include shouting aggressively, punishing children and young people through extra drills/exercises, singling children and young people out in front of peers for minor things such as leaving kit behind, or communicating with children and young people through a personal social media account.</p> <p>It is important to note that child wellbeing concerns may, with further exploration, or over time, escalate to become more significant child protection concerns and therefore it is important to respond appropriately and at the earliest opportunity.</p>
<p>Child Protection Concern</p>	<p>Concerns for children or young people who are at risk of, or suffering, significant harm or abuse. Child protection matters are reported to police or social work. <i>Examples may include physical abuse, neglect, sexual abuse, radicalisation, emotional abuse, trafficking or sexual exploitation.</i></p>

Low Level Concerns (Niggles)

[The Whyte review](#), published in 2022 states:

“Insufficient attention has been given by [British Gymnastics] to the management of low-level concerns.... The management of such complaints has not had sufficient prominence in available policy and guidance and the Board was not provided with enough information about these types of complaints.”

“I am confident that had earlier examples of low level (concerns) been identified and appropriately managed, those same coaches would not have continued to use obviously inappropriate coaching techniques.” (Page 22)

Whilst the Whyte Review was focused on British Gymnastics, the learnings are important for all sports.

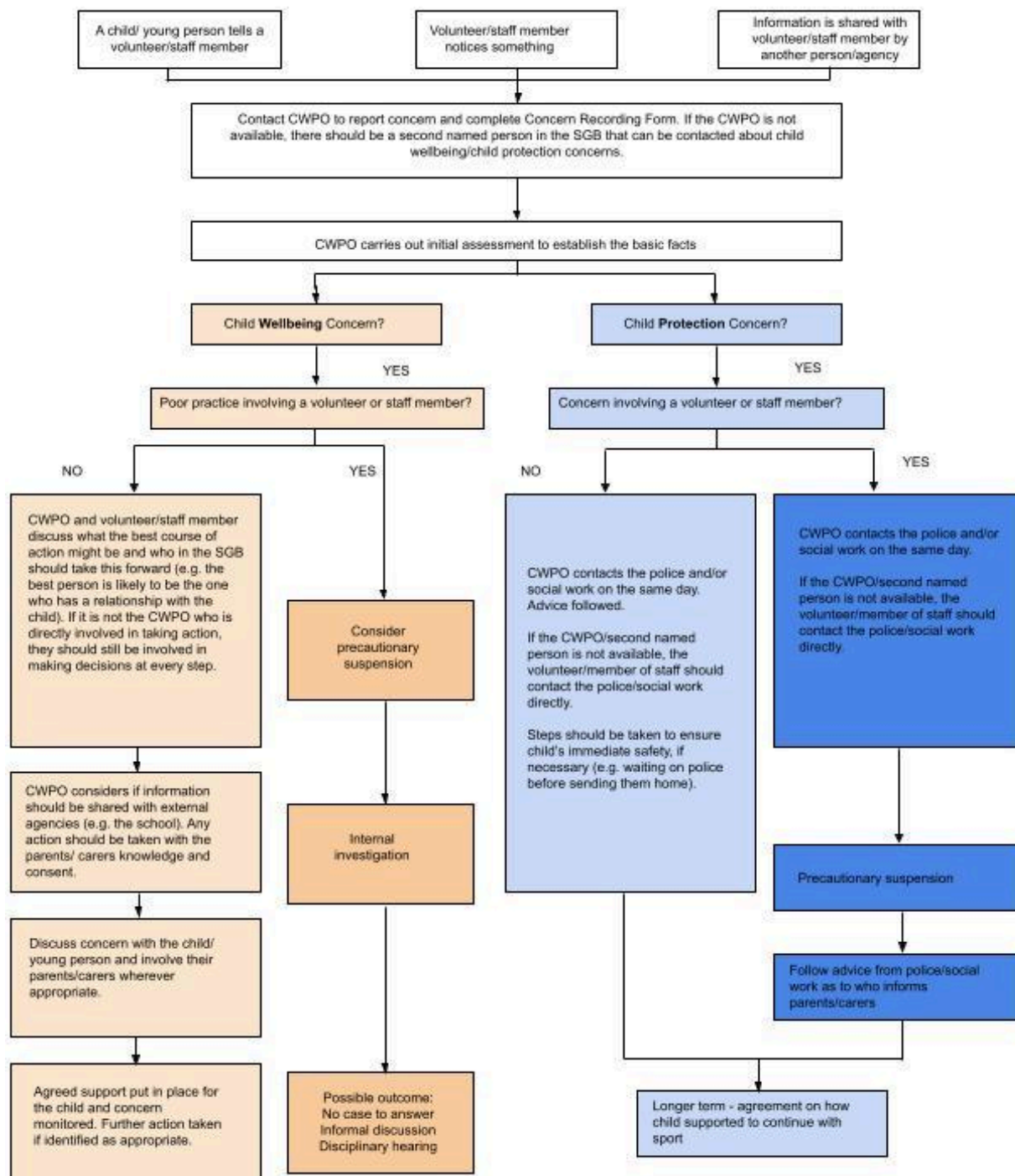
What is a low-level concern:

- Adult’s behaviour does not meet threshold for an allegation.... BUT
- Any concern, no matter how small and even if no more than causing a sense of unease or a ‘nagging doubt’ that...
- ... an adult may have acted in a way that is inconsistent with an organisation’s code of conduct, including inappropriate conduct outside of work.

Examples of such concerns could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to organisational policy
- using inappropriate sexualised, intimidating, or offensive language
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating children

Part A - Responding to Concerns about a Child



A.1 Concerns about the Wellbeing of a Child (A Child Wellbeing Concern)

(NOT involving concerns about child abuse)

1. Respond

Any wellbeing concern about a child will be in relation to one or more of the wellbeing indicators – Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible and Included (SHANARRI). For example, if a child seems withdrawn, they may have experienced an upset in the family, such as a parental separation, divorce or bereavement.

Wellbeing concerns will always be discussed with the child or young person, and their view taken into account. Parents/carers have the primary responsibility for the safety and wellbeing of their children and, as such, wellbeing concerns should also be discussed with them.

Common sense is advised in these situations and the best interests of the child will be considered as to what is the best way forward for each individual child. Where appropriate, consent should be gained from the child with regard to future actions and further support.

2. Record

A written record of the wellbeing concern (including Low Level Concerns/niggles) will be made as soon as possible using the *Concern Recording Form*, completing as much of the form as possible. Where the form is completed electronically it should be saved to a file that is only accessible by the Child Wellbeing and Protection Officer (CWPO) and specific committee members or staff who have a remit to access. The record will be passed to the CWPO that day.

3. Report

All wellbeing concerns will be reported to the Club (if applicable) or SCA CWPO as soon as possible and the appropriate course of action agreed. Club CWPOs will forward a copy of the form to the SCA Lead CWPO without delay.

At any point, if there is uncertainty about the appropriate course of action, advice should be sought from the Club or SCA Child Wellbeing and Protection Officer.

A.2 What to Do if a Child Tells You about Abuse (A Child Protection Concern)

No member of an Affiliated Club or SCA shall investigate allegations of abuse or decide whether or not a child has been abused.

Allegations of abuse must always be taken seriously. False allegations are very rare. If a child says or indicates they are being abused or information is obtained which gives concern that a child is being abused, the information must be responded to on the same day in line with the following procedure.

A.2a Respond

Allegations of abuse will always be taken seriously. If a child says or indicates they are being abused or information is obtained which gives concern that a child is being abused, the information will be responded to on the same day.

How to respond if a child discloses abuse

Good Practice

- React calmly so as not to frighten the child or young person.
- Consider what requirements a child or young person may need to communicate effectively (e.g., do they have any additional support needs, is English their first language, etc.).
- Listen to the child or young person and take what they say seriously. Do not show disbelief.
- Reassure the child or young person they are not to blame and were right to tell someone.
- Avoid asking any questions. If necessary, only ask enough questions to gain basic information to establish the possibility that abuse may have occurred. Only use open-ended, non-leading questions, e.g. Who? What? Where? When?
- It's important to explain to the child or young person who you may need to share information with and why. Don't promise to keep information to yourself.
- Do not introduce personal information from either your own experiences or those of other children or young people.

Avoid:

- Panicking.
- Showing shock or distaste.
- Probing for more information than is offered.
- Speculating or making assumptions.
- Making negative comments about the person against whom the allegation has been made.
- Approaching the individual against whom the allegation has been made.
- Making promises or agreeing to keep secrets and giving a guarantee of confidentiality.

If you are concerned about the *immediate* safety of the child:

Take whatever action is required to ensure the child's immediate safety.

Pass the information immediately to the police and seek their advice.

A.2b Record

A written record will be made of the information as soon as possible using the Concern Recording Form, completing as much of the form as possible. Reporting concerns will not be delayed by gathering information to complete all sections of the form. It is important to record the actual words used by the child/young person, even if this makes you feel uncomfortable.

A2.c Report

The information will be passed to the Club or SCA CWPO immediately (or second named person if not available) and on the same day. The CWPO will pass this information onto the police or social work services without delay and take advice about the next steps.

If neither is available, or when an immediate response is required, the police and/or social work services will be contacted directly. Any advice will be recorded.

The police and social work services have a statutory responsibility for the protection of children and may already hold other concerning information about the child or young person. The information in the Concern Recording Form will help the CWPO, police and social workers to decide what action to take next.

If the matter originates at a club, the Club CWPO must send a copy of the form to the SCA CWPO without delay. The Case Management Thresholds referenced in section B provide guidance on referring these concerns.

A.2c Sharing Concerns with Parents

Where there are concerns that the parent(s) may be responsible for or have knowledge of the abuse, sharing concerns with the parent(s) may place the child at further risk. In such cases advice must always firstly be sought from the police or social work services as to who informs the parents.

A.2e: Peer on Peer considerations:

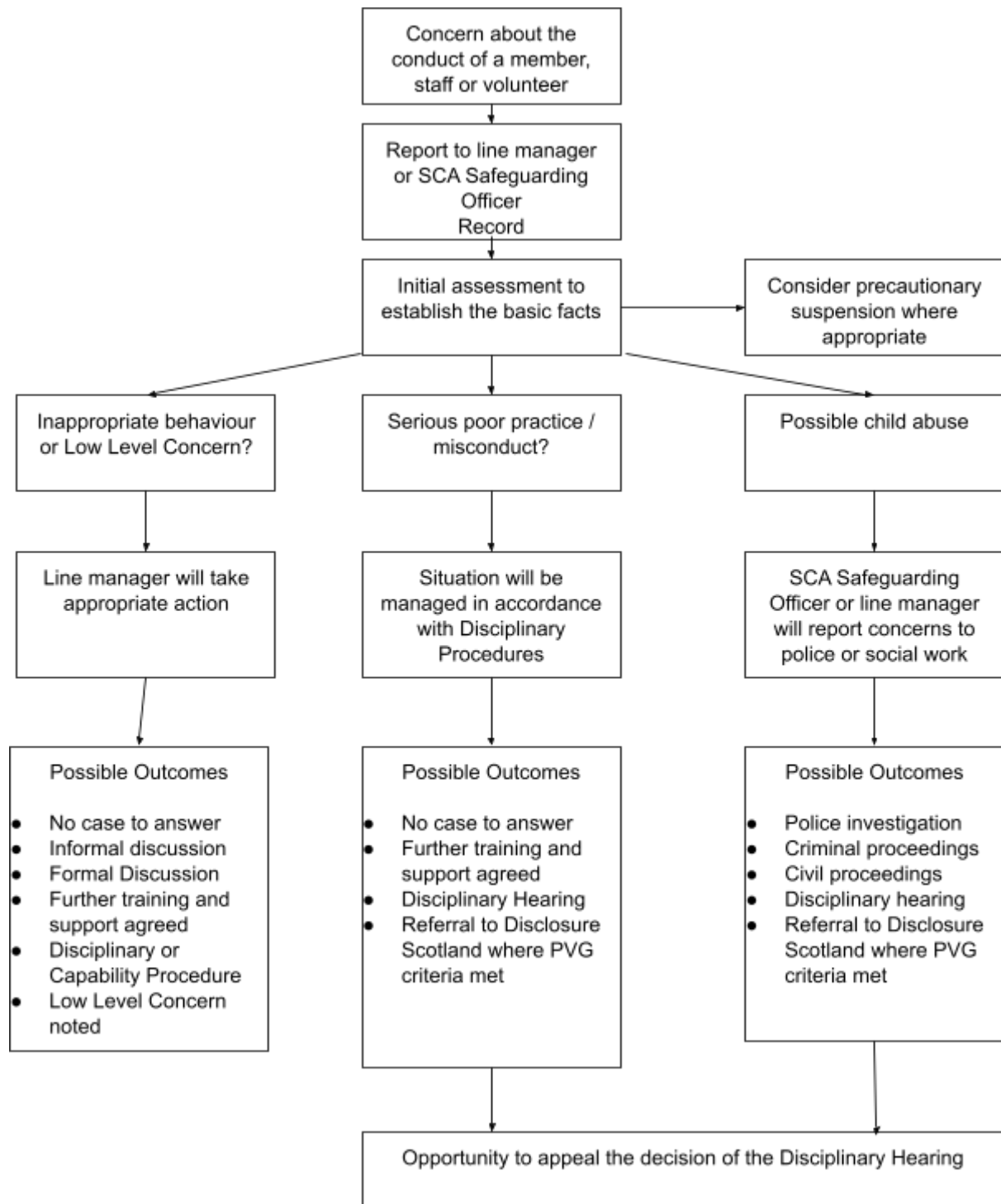
When dealing with concerns relating to a child as a result of the behaviours of another child, there are some additional factors to consider. Daniel Rhind, a leading safeguarding academic, identified that peer to peer abuse (bullying, sexual harassment etc) make up the majority of sport incidents.

The following resources may be useful in considering Peer on Peer concerns:

- The National Guidance for Scotland has some guidance relating to harmful sexual behaviour. (Part 4 at p.168 onwards and p. 196 onwards)

- Safeguarding: identify, understand and respond appropriately to sexual behaviours in young people – this could also be used for risk management concerns as well.
- Everyone's Invited although written for an English context).
- Farrers Addressing child-on-child abuse. This document helps to provide effective safeguarding practice and principles to consider in their decision-making process. However, it will be worth bearing in mind that:
 - It is written for an English context and so references to the law and schools' guidance is English.
 - It is aimed at schools and colleges
 - Some references to English safeguarding systems (e.g. LADO etc.)
 - It adopts the language of KCSIE 2022 which refers to "victims" and "perpetrators" which no longer the terms used

Part B - Responding to Concerns about the Conduct of a Member of Staff / Volunteer



Concerns about the Conduct of a Member of Staff or Volunteer

This section should be read in conjunction with:

1. SCA HR Handbook and associated procedures, where concerns relate to a member of staff. For employed staff, HR handbook will always take precedent over this process.
2. SCA Complaints and Disciplinary Procedures
3. Any relevant club complaints and disciplinary procedure or equivalent (where concerns relate to a club level matter)

These procedures aim to ensure that all concerns about the conduct of an adult member of staff or volunteer of either an affiliated club or SCA are dealt with in a timely, appropriate and proportionate manner. No member of staff of the SCA in receipt of information that causes concern about the conduct of a member of an adult towards children shall keep that information to themselves, or attempt to deal with the matter on their own.

In the event of an investigation into the conduct of an adult, actions will be informed by the principles of natural justice:

- Adults will be made aware of the nature of concern or complaint, unless doing so may place others at risk, advice from Police suggests not doing so, or sharing information may compromise future Police investigations.
- Where the concern is about possible child abuse, advice will firstly be taken from the police as to what can be said to the adult
- An adult will be given an opportunity to put forward their case.
- The Club and/or SCA will act in good faith, ensure the matter is dealt with impartially and as quickly as possible in the circumstances.

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

At any point in the management of concerns about the conduct of an adult, advice may be sought from the police or social work services.

B.1 Initial Reporting of Concerns

All concerns about the wellbeing of a child arising from the conduct of a volunteer/member of staff will be reported to the line manager/CWPO on the day the concern arises. Line managers will pass all concerns reported to them to the CWPO. If the CWPO is unavailable, or when an immediate response is required, the CWPO deputy will be contacted.

No person in receipt of information that causes concern about the conduct of an adult towards children shall keep that information to themselves or attempt to deal with the matter on their own.

Where the concern is about the line manager or CWPO it must be reported to another appropriate leader in the Club/SCA.

B.2 Recording

Concerns will normally be recorded using the Concerns Recording Report Form or equivalent as soon as possible. Reporting the concerns to the line manager/CWPO should not be delayed by gathering information to complete the form or until a written record has been made.

All subsequent actions taken and reasons for decisions shall be recorded appropriately by the line manager/ CWPO or the person appointed to manage the response to the concerns. Where HR Procedures/ Disciplinary Procedures are invoked, a written record will be made of all actions and reasons for decision. Guidance on the storage, sharing and retention of such records is contained in the relevant procedure.

B.3 Conducting the Initial Assessment

Once the concerns have been reported, the line manager / CWPO or the person appointed to manage the response process will:

- Establish the basic facts by conducting an initial assessment in order to determine the appropriate course of action.
- Consult external agencies such as the police and social work services for advice at any time. This is important because they may hold other important information which, when considered alongside the current concerns, builds a significant picture of concern.
- Refer to the Case Management thresholds (see below) to determine how the concern will be managed

The purpose of the initial assessment is to clarify the nature and context of the concerns. It will determine if the adult's conduct was:

- inappropriate behaviour
- serious poor practice/misconduct or
- potentially criminal.

The initial assessment will not form part of the disciplinary investigation. Any disciplinary action taken, following the initial assessment, must not jeopardise any ongoing criminal

investigation. The police will be asked for advice on appropriate action by the club. Every situation is unique so guidance cannot be prescriptive.

Review information and determine whether behaviour:

- Is ENTIRELY consistent with the relevant code(s) of conduct, policies and the law
- Constitutes a Low-Level Concern (LLC)
- When considered with any other LLCs that have previously been raised about the same individual could now meet the threshold of an allegation and should be referred to relevant external agencies

Responding to a Low Level Concern

During the initial assessment it may be identified that the concern is a 'low level concern'. It may be appropriate to:

- Speak to the person who raised the concern (unless raised anonymously)
- Speak to any potential witnesses
- Speak to the person about whom the LLC has been raised

Next Steps

- **Where behaviour is potentially criminal**
Where the nature and seriousness of the information suggests that a criminal offence may have been committed, or that to assess the facts may jeopardise evidence, advice will be sought from the police before the adult is approached.
- **Where behaviour is potentially not criminal**
Subject to the nature and seriousness of the situation, if it is not clear at this stage whether a criminal offence may have been committed, the member of staff/volunteer may be approached as part of the information gathering process.

Speaking to the child/young person

An initial assessment of the basic facts may require the need to ask a child some basic, open-ended, non-leading questions solely with a view to clarifying the basic facts. It may also be necessary to ask similar basic questions of other children, or other appropriate individuals.

Interviewing children about possible abuse and criminal offences is the sole remit of specially trained police officers and social workers. Questioning of children by those conducting an initial assessment will always be avoided as far as possible. If it is necessary to speak to the child or young person in order to clarify the basic facts, consent will be obtained from a parent/carer.

Case Management Thresholds

As part of the initial assessment, the CPSU [Case Management Thresholds](#) should be referred to in order to establish whether the next steps are managed by the Club CWPO or

SCA CWPO. If the concern does not relate to a club context, all concerns will be managed by the SCA CWPO.

- Level 1 concerns - notify SCA CWPO as per reporting procedures and agree club level management of the concern
- Level 2 concerns - notify SCA CWPO and agree whether club level or SCA level management is required
- Level 3 concerns - must always be referred to SCA CWPO without delay and will likely be managed by SCA CWPO or another delegated person/panel

Primacy and Jurisdiction

In addition to the case management threshold identification, it is necessary to identify any potential cross jurisdiction issues to establish which organisation will take the lead in the future steps of managing the concern.

Examples of cross-jurisdiction issues include an adult operating in more than one club or in more than one country.

The initial assessment will consider:

- where adult of concern lives (i.e. country of the UK or internationally)
- where the adult of concern operates (country and/or club),
- what role adult of concern holds/activities they engage in,
- membership and/or club affiliation
- where the concern arose
- where any potential victim lives,
- where potential victim operates,
- whether there is an ongoing or historic concern previously managed by a specific National Association

If this initial assessment identifies cross-jurisdiction issues between SCA and British Canoeing/Canoe Wales/Canoe Association of Northern Ireland, the agreed process will be followed to establish primacy.

It is recognised that;

- there may be some circumstances where the jurisdiction for safeguarding matters concerning members of the British Canoeing, Canoe Wales or The Canoe Association of Northern Ireland, shall vest exclusively with SCA. Appendix 3 to the UK Agreement sets out the agreed circumstances where SCA has exclusive jurisdiction for a matter and such Appendix 3 shall be amended by agreement in writing between SCA and the other relevant parties from time to time.
- there may be some circumstances where safeguarding matters fall within the jurisdiction of SCA but also one or more of British Canoeing, Canoe Wales or the Canoe Association of Northern Ireland. Appendix 3 to the UK Agreement sets out the circumstances where cross jurisdiction arises, the process for identifying the National Association with primacy for investigation and determination of the relevant safeguarding case. The National Association all agree to uphold and be bound by the determination of the safeguarding case by the National Association with primacy. Where SCA is determined to hold primacy, the matter will be dealt with in line with this Responding to Concerns Procedure. Where another National Association is determined to hold primacy, the matter will be dealt with under their relevant safeguarding procedure and the decision will be binding

on SCA.

Pursuant to Appendix 3 of the UK Agreement, SCA agrees to be bound by the decision on a safeguarding matter determined by British Canoeing, Canoe Wales and/or the Canoe Association of Northern Ireland where that National Association has determined primacy over the matter. This decision will not be subject to any appeal within SCA.

B.4 Precautionary Suspension

Suspension is not a form of disciplinary action. The adult involved may be suspended whilst an investigation is carried out.

Suspension will be carried out in accordance with the Club or SCA Disciplinary Procedures. The adult will be informed of the reason for suspension (within the confines of sharing information) and given the opportunity to make a statement should they wish to do so.

Notification of the suspension and the reasons will be conveyed in writing to the individual in accordance with the Club or SCA Disciplinary Procedures.

An adult who is precautionarily suspended will be kept regularly updated about their suspension and will also have regular contact with their manager.
The adult will be supported during this time by a relevant other person in the club/SCA.

B.5 Possible outcomes of initial assessment:

1. No further action (facts do not substantiate complaint or low level concern). Update the individual(s) involved as appropriate, feedback to person raising concern.
Consider: - Is Code of Conduct clear? How is the individual's behaviour being perceived by others?
2. Concern relates to poor practice and/or misconduct (not of a criminal nature) and situation is dealt with under organisation Disciplinary Procedures (B.6)
3. Concerned deemed to be a Low-Level Concern, recorded and managed under the LLC guidance (B.7)
4. Concern supports possible criminal behaviour resulting in any of the following: (B.8)
 - a. Child Protection investigation, jointly by police and social work services.
 - b. Criminal investigation by the police. The results of a criminal investigation may well influence the disciplinary investigation, but not in all cases.
 - c. Disciplinary investigation by the organisation at conclusion of statutory agency involvement.

Case Management Support Service

The Case Management Support Service for Scottish Sport (CMSS) is a service provided by Children 1st under contract to **sportscotland**. It is a fully independent and impartial service designed to support Scottish Governing Bodies of Sport (SGB's)

CMSS provides back-end support to SGBs. The SGB will remain front facing and lead the process of receiving and responding to concerns & complaints.

In exceptional cases, Children 1st will establish a Wellbeing and Protection Panel to provide independent case management services in these situations with the jurisdiction and decision-making responsibility remaining with the individual SGB.

SCA may engage the CMSS during the routine management of concerns.

B.6 Initial assessment supports concerns about poor practice and/or misconduct (not of a criminal nature)

The line manager/ CWPO will deal with the situation in line with the SCA HR Handbook (in the case of staff), the SCA Disciplinary Policy or Club Disciplinary Policy (depending on who is leading the process).

Any impact on a child's wellbeing caused by an adult's poor practice or misconduct will be managed under the disciplinary policy. Pending the outcome of the initial assessment, precautionary suspension will be considered in all cases where there is a significant concern about the conduct of an adult towards a child.

Where the circumstances meet the referral criteria set out in the Protection of Vulnerable Groups (Scotland) Act 2007, the Club or SCA has a duty to make a referral to Scottish Ministers.

B.7 Initial assessment identifies the concern as a Low Level Concern

Where the concern has been assessed as being a low level concern, the following actions are possible

- No further action,
- Management guidance issued
- Individual to complete training
- Discussion with individual*
- Disciplinary, Grievance or Capability Procedure

*During any discussion with individual:

- Clarify why behaviours were concerning and inappropriate
- Clarify the change required
- Identify any support required
- Set out consequences if behaviour repeated
- Complete any action plan or risk assessment required

Low Level Concerns should normally be recorded securely on the SCA / Club case management system for future review in the event of further concerns being raised.

B.8 Initial assessment supports concerns about possible criminal behaviour

If the initial assessment gives reasonable cause to suspect an adult's behaviour has been a criminal offence, the CWPO will report the concerns to the police as soon as possible on the day the information is received.

Referrals to the police will be made by telephone and confirmed in writing by the CWPO within 24 hours. A copy of the Concern Recording Form (or equivalent) will be provided to the police on request. The name and designation of the social worker or the police officer to who the concerns were passed, together with the time and date of the call, will be recorded by the CWPO.

Appropriate steps will be taken to ensure the safety of the child or young person who may be at risk. The parents/carers of the child or young person involved will be informed as soon as possible following advice from the police.

Advice will firstly be obtained from the police about informing the adult involved in the concerns. If the advice is to inform them, they will be told that information has been received which may suggest an allegation of abuse or possible criminal offence. No details will be given unless advised by the police. All actions will ensure the best evidence is preserved for any criminal proceedings while at the same time safeguarding the rights of the adult.

B.9 Disciplinary Investigation

Following advice from the police, cases that also involve a criminal investigation, will not preclude disciplinary action being taken provided sufficient information is available to enable the line manager/ the SCA Safeguarding Officer to make a decision and that to do so does not jeopardise the criminal investigation.

B.10 False or Malicious Allegations

In the very exceptional circumstances that an investigation establishes an allegation is false, unfounded or malicious:

- The adult involved will receive an account of the circumstances and/or investigation and a letter confirming the conclusion of the matter. They may wish to seek legal advice.
- All records pertaining to the circumstances and investigation will be destroyed.
- The line manager/ CWPO will take all reasonable steps to support the individual in this situation.
- In these circumstances SCA will review the child's participation in paddlesport.
- Data collected for the investigation will be destroyed in accordance with the requirements of the GDPR Regulations.

B.11 Non-recent Allegations of Abuse

Allegations of abuse may be made some time after the event e.g. an adult who was abused as a child by someone who is still currently working with children. These procedures will be followed in the event of an allegation of non-recent abuse.

B.12 Self Reporting

An aim of this guidance and the incorporation of Low Level Concerns within the guidance is to create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour which are set out in codes of conduct are constantly lived, monitored, and reinforced by all staff and volunteers.

An individual who wishes to self report their own behaviour or actions should do so by contacting their line manager or the CWPO. Such reports should be handled in line with the procedure in the same way as a report from a third party.

B.13 Media

All media enquiries relating to the conduct of a member of staff will be referred to the SCA Chief Executive or General Secretary and/or the Safeguarding Officer.

B.14 - Volunteers/Staff considered for listing

If the club is notified that a member of staff in regulated work with children is under consideration for listing by Disclosure Scotland, a precautionary suspension will be put in place pending the outcome.

B.15 Referrals to Disclosure Scotland

Where the circumstances meet the referral criteria set out in the Protection of Vulnerable Groups (Scotland) Act 2007, the club / SCA will fulfil its legal duty to make a referral to Disclosure Scotland.