



THE INDEPENDENT **FOOTBALL** COMMISSION

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**REPORT** ON  
CHILD PROTECTION in FOOTBALL

*august* 2005

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REPORT ON CHILD PROTECTION in FOOTBALL

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## CHAIRMAN'S FOREWORD

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In 2004, the Independent Football Commission produced two specialist reports in addition to its normal Annual Report. The first was on Self Regulation and the second on Euro 2004. This year we have now produced this further single issue report on Child Protection.

In recent years the complex issue of child protection has assumed growing importance, in football, in sport more generally and in our wider society. Football has certainly taken child protection seriously and, as our report shows, much commendable progress has taken place. Sir Trevor Brooking has concluded that for the full potential of English football to be exploited, attention must be devoted to ever younger children, with major initiatives at the primary school level. This brings into even sharper focus the Football Association's own objective to ensure children playing football must have an "enjoyable and safe environment and be protected from abuse". Parents and guardians have a right to expect that football will do all it can to fulfil this objective.

This report originated in a request from the Football Association for the IFC to look into recent policy and practice initiatives, which had arisen from well publicised cases in the 1990s. The report now presented is the result of some 18 months work, involving meetings with over 200 individuals and organisations. It draws heavily upon the views expressed by active and experienced practitioners and upon the thoughts and concerns of those closest to the issues of child protection. The IFC has the greatest admiration for those involved in taking forward the complex policies and procedures aimed at protecting the huge numbers of boys and girls who play football in England. We do make recommendations aimed at both grassroots and professional football. Those recommendations must be set in the context of the very positive view the IFC takes of the real progress which has been made. I hope that our report will be of interest and value to those involved and that it will contribute to the public recognition of what has been achieved.



PROFESSOR DEREK FRASER  
CHAIRMAN

# THE INDEPENDENT FOOTBALL COMMISSION

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The Independent Football Commission (IFC) was established at the end of 2001 by the governing bodies of football in England, with the agreement of government. It scrutinises the performance of the governing bodies – the Football Association (FA), the FA Premier League (PL) and the Football League (FL) – with particular reference to their role in meeting the needs of the football community in England, and the appropriateness of the rules, regulations and policies by which they govern the game. Overall, the IFC's role is to evaluate the effectiveness of football's existing self-regulatory framework and to suggest improvements. Additionally, the IFC forms the last point of appeal in football's complaints process. Further information about the IFC can be found on the IFC website: [www.theifc.co.uk](http://www.theifc.co.uk).

The IFC examines a range of issues on an annual basis, and publishes its findings and recommendations in its publicly available Annual Reports or, from time to time, in single issue reports. All IFC publications are listed on the IFC website and are available free of charge within the UK, on request.

The IFC comprises a Chairman, Professor Derek Fraser, and four commissioners. The Commission is supported by a small office based in Stockton-on-Tees. The IFC is funded by the three football authorities but is independent of them and of government.

Contact details for the IFC can be found on the back cover of this report.

## EXECUTIVE SUMMARY

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The **Introduction** explains the background to the IFC's work on child protection (pages 6-7); the following section (pages 8-9) provide the background to **child protection in football**, and includes milestones in the strategic development of football's child protection programme. In the section on the **Football Association**, the FA's aims and objectives are examined, also strategic planning to implement the child protection policy and the impact of the NSPCC's national standards, to which football is committed (pages 10-12).

**Grassroots** looks at the work of the County Football Associations and their affiliated clubs in establishing child protection measures. The role and responsibilities of **Child Protection Officers** is discussed, in particular the demands on volunteers and the skills and experience needed (pages 15-16). The FA's ***Child Protection and Best Practice Workshop*** is found to be well-received; some concerns are identified with regard to monitoring standards and the procedures for re-accreditation (pages 16-17). **CRB checks** have had significant infrastructural impact. The principle is generally accepted. The FA's CRB Unit provides a specialist administrative service that functions well. Some aspects have still to bed in; the IFC found some anxiety about re-certification and concerns about multiple checking and the time it can take to complete CRB processes (pages 17-21). **Referees** have been less persuaded than others in the football community of the need for training and CRB-checks; some thought is needed about how to make them more comfortable with the child protection strategy (pages 21-23). The IFC commends the introduction and growth of **Charter Standard**. Monitoring the standard is important, and ensuring that child protection is not confined to the sector. Charter Standard could be better promoted to communities. For clubs, access to funding is a key benefit: the FA must work with the Football Foundation review of child protection criteria applied to its grants schemes (pages 23-25). The section concludes with some thoughts **about children** themselves: how parent behaviour, policy on photographs, and scouts affect them. Laws inside and outside the game both have a function in protecting children; it is important that clubs recognise this, and liaise with local authorities, especially social services and the police (pages 25-28).

**Professional Football**, considers seven areas where child protection is significant. Systems for **compliance and monitoring** in the Premier League and the Football League are compared (page 30-31), also the roles and focus of **Children's Officers and Child Protection Officers**, which are different. The PL and FL ensure special training is given. The FA workshop is being adapted to meet particular needs: it is important that quality is consistent (pages 32-3). The PL and FL encourage **networks and partnerships**; the former could be extended (page 33). **Academies and Centres of Excellence** are the traditional focus for child welfare. Measures to safeguard the children there seem to work well. Codes of conduct encourage behavioural propriety, other policies offer a wide range of guidance: in some cases there is welfare and information overload. The IFC has some concerns about exit strategies at academies (pages 33-37). The PL applies child protection measures more evidently to **wider club activity** than the FL does. Ball boys and girls, mascots, stewards and policy on the use of photographic images are areas the two leagues need to review (pages 37-41). That there are different systems within the game for **CRB checks and referrals** is the source of some tension and may weaken the integrity of child protection in football as a whole (pages 41-44). Finally, the section considers **professional players** who are seldom included in child protection training but would benefit from it (pages 44-46).

In the last part of the report, the IFC considers the special needs of **girls in football**, which are not always given appropriate attention (pages 47-49). More listening is needed to the **voice of the vulnerable**, both children and vulnerable adults (pages 50-53).

In **conclusion** the IFC identifies four main messages: slowing the pace; proper resourcing; support from the top; and working together (page 54).

### **Summary of recommendations**

1. the FA to consider specific resourcing to enable CFA CPOs to become paid posts
2. CPOs and CWOs to be identified on county /club /league literature; the format of job/person specifications should be reviewed
3. the FA to work with the Football Foundation in its review of child protection criteria for the award of grants
4. guidelines on the use of photographic and other images to be updated and reissued
5. national strategy for ID cards/ licensing within youth football to be clarified and communicated within an overall review of monitoring
6. portability of CRB decisions to be functional on CAS in early 2006
7. CRBU to look at information flow when CRB checks fall outside target time-scales, and guidance on expediting processes. FA to consider a general rapid update system out to counties
8. roles and processes for re-accreditation of the workshop and CRB re-certification to be clearly communicated by autumn 2005
9. wider community advertising of Charter Standard clubs and their benefits
10. guidance on handling scouts to be included in training
11. slower pace for future roll-out with a limit on new initiatives
12. the FL to issue central guidance and direction on general club activity and clarify which policies and procedures its clubs must follow, and monitor compliance
13. PL and FL monitoring to include quality and measures of effectiveness, as well as adherence to rules
14. at least 2 staff with responsibility for child protection at all clubs, one male, one female
15. PL and FL to review communication to parents and children concerning the decision-making processes around release/retention at academies, and assess and assure transparency and understanding
16. minimum standards for the care and safety of ball boys/girls and child mascots, to include a requirement for guidance or training for those with direct responsibilities
17. clear instructions from the centre on appropriate child protection measures in stewarding, geared towards achieving consistent practice and the understanding of all security personnel
18. updated policy on the use of photos and recorded images of children to apply to all levels of the game
19. shared practice and closer liaison between the FA and PL on CRB checks, referrals and case management, with specific attention to portability
20. the football authorities to monitor and actively deter CRB "creep"
21. FL and PL in collaboration with the PFA and the FA to introduce basic child protection guidance and training for professional players
22. football authorities to include specific guidance on girls, as players and in other forms of participation, in their child protection policies and procedures
23. discrimination awareness to be a clear component in child protection training

# INTRODUCTION

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The IFC was asked by the FA in 2003 to look at its work on child protection. At that time the roll-out of its policy was a year old. The FA felt it was going well, that the IFC would be able to identify key areas of best practice that would benefit understanding and developing practice within the game, and that an objective overview would be helpful. The IFC readily agreed and included child protection on its equity agenda for 2004, intending to include its findings in its 2004 Annual Report.

The IFC began this work in March 2004. It soon became apparent that, to be of use, the study would be much more extensive than originally anticipated. Moreover, whereas to date the IFC's work had largely, within its terms of reference, focused on professional football under the auspices of the FA, the Premier League and the Football League, it was clear that to examine child protection, it was essential to turn to grassroots football where 99% of children in football play the game. For the IFC this was new, and large, territory.

A decision was therefore taken to give child protection the time and attention it merited and to issue the IFC's findings not as a chapter in the Annual Report but as a stand-alone publication in 2005. The IFC allowed 18 months for the study. Other IFC work continued throughout this period but child protection was its priority.

This report represents the outcome of enquiry, meetings and research during the period March 2004 – August 2005. During this time, the IFC met with some 200 organisations and individuals, and received and examined a large quantity of written and some audio-visual materials. These are listed in Annexes B and C, on pages 56-58. The IFC believes that the scope of its consultations has been appropriate and allows it confidently to say that its report is evidence-based and representative of child protection practices and principles in football within the affiliated and professional game in England in 2004-05.

The method of enquiry was to meet informally with those addressing child protection, listen to their views and exchange ideas. What the resulting IFC report offers to the football authorities and the wider public interested in the game and child protection issues within it, is a reflection of what practitioners felt were the issues at the time, what successes they identified, what challenges they face, and what their ideas for improvement are. The IFC believes this is valid and will be of strategic use. The recommendations for the future in this report reflect the messages the IFC heard, to which it adds the experience and knowledge of the Commission.

The IFC has not attempted, nor would it have been able within its timescale and resource, to consult everyone involved in child protection in football – not least because child protection literally does involve everyone. There will be those who, on seeing this report, will wonder why the IFC did not call on them. The IFC did not talk to scouts, for example, or agents, or parents, or stewards. It visited three clubs in the Championship and two clubs in each of the



League 1, League 2 and the Premiership, and one in the Conference (though it examined documentation from several more). Perhaps, for some, the most glaring absence of all, it did not talk to children<sup>1</sup>. But, as is clear from the list in Annexe B, it did talk to an enormous range of people appropriate to the subject, and is confident of the conclusions that it has drawn.

The IFC is filled with admiration for the work that all these people do and for the skills in the sensitive and difficult work they undertake in the protection of children.

The IFC makes no claim to possess their expertise. Any errors of fact or interpretation in this report are wholly the IFC's.

Much material and many views were gathered that are not used in this report. The IFC would like to reassure those who offered them that they will be passed, in confidence and anonymously, to the football authorities.

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<sup>1</sup> Although it closely examined the research findings of those who have, particularly those in the FA-commissioned research by Celia Brackenridge Ltd in 2002-03.



# CHILD PROTECTION IN FOOTBALL: BACKGROUND

Child protection was not specifically on football's radar, or that of other sports, before the mid-nineties. A number of high-profile cases, notably in swimming but including football, prompted action by many of sport's governing bodies, a sharp awakening to the complexities of the issues, an urgent need to focus on the safeguarding of the millions of children engaged in active sport outside school. The FA took an early lead and was a contributor to some key national initiatives, including the NSPCC Task Force in 2000 which led to the establishment of the NSPCC's Child Protection in Sport Unit (CPSU) in 2001. The FA continues to work closely with the CPSU and is represented on both the National Governing Body Lead Child Protection Officer Support Group, and the CPSU Steering Group.

The FA's own strategic action, and that of the other two football authorities, urgently to address child protection dates from 1997 and is illustrated in Box 1. The challenge for football was, and remains, daunting because of the sheer numbers involved. The Amateur Swimming Association (ASA) – which, in 1996, was one of the first national sporting bodies to publish Child Protection Guidelines – has just under 1600 member clubs; the Amateur Athletics Association (AAA) – which launched welfare procedures for child protection between 2002 and 2004 – has around 1400 member clubs; the Rugby Football League (RFL) – which began developing its child protection policy in 2001 – has around 400 affiliated clubs nationally. The FA has around 44,000 affiliated member clubs.

No one knows how many people play football in England. The FA estimates are that it is around 4 million children and over 700,000 adults. The vast majority play outside the professional game, in football administered and organised

## *strategic steps in child protection in football*

1997	FA <i>Charter for Quality</i> , incorporating child protection
1998	criminal records checking by self certification introduced by the FL for those working in youth football
	PL took responsibility for child protection at PL clubs
	FL Programme for Excellence in youth football
1999	FA consultation with the NSPCC
	formal child protection requirements in the PL
2000	FA child protection policy issued
	first Child Protection Officers
	training programmes for child protection tutors
	PL code of practice for the health and safety of academy students
	child protection policy included in FL regulations
2001	FA <i>Child Protection Procedures and Practices Handbook</i>
	child protection workshops
	simple <i>Guide</i> to child protection with CD ROM
	Charter Standard club scheme
2002	child protection, including CRB registration, brought into PL rules
	PL annual conferences for Children's Officers
2003	sign-up to CPSU national standards
2004	establishment of the FA's Criminal Records Bureau Unit
2005	development of Portfolio Qualification for PL Children's Officers
	100,000 people known to have completed the FA Child Protection and Best Practice workshop
	FL and FA development of new FL Child Protection strategy

BOX 1

largely by volunteers, estimated to number around ¼million. The County Football Associations (CFAs), independent bodies working with the FA, oversee the organisation and development of the amateur affiliated clubs, their leagues and development, with only a small number of paid staff and limited resources. Apart from a modest annual grant from the FA, they raise their funding themselves. The number of clubs, each often with several teams, that a county oversees can range from around 200 in a small county such as Huntingdon, to around 1800 in nearby Essex. In the PL and FL there are 92 clubs. 38 have an academy or a centre of excellence for developing young players: these will each typically have around 130 (at a Premiership club) pre-contract

students and scholars. The rest will either have a youth development programme or will offer coaching courses for youngsters through their Football in the Community scheme (FITC). FITC estimates that it reaches over a million people a year, mostly U/18s.

Safeguarding children in football is thus not a task to be under-estimated. The work that has been done in the last 5 years and the progress made is astonishing. The IFC joins the very large number of informed people who regard with great respect the individuals throughout the game who have made things happen and brought to the challenge dedication, commitment and a real care for children in football's charge.

# THE FOOTBALL ASSOCIATION

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The FA developed its strategy over a 2-year period from 1999 to 2000, during which time there was extensive consultation with the other two football authorities and with external expertise at the NSPCC and elsewhere. This was not a simple reaction to the surfacing of child abuse incidents in sport, but a recognition of the responsibility football carries for young footballers, and a taking forward of welfare initiatives initially defined in the 1997 FA *Charter for Quality*<sup>2</sup> from which the academy and centre of excellence system developed. The discrete focus on child protection was, however, new.

In conjunction with the NSPCC and others, and with the backing of the PL and FL which both subscribe to it, the FA drew up and, with Board approval, published its *Child Protection Policy* in 2000 and subsequently its *Child Protection Procedures and Practices Handbook* (June 2001).

The *Handbook* provides aims and objectives and guidance on good practice and recommended procedures. The opening message is clear:

*Every child or young person, defined as any person under the age of 18, who plays or participates in football should be able to take part in an enjoyable and safe environment and be protected from abuse*<sup>3</sup>.

## *aims of the FA Child Protection Policy*

- To develop a positive and pro-active position in order best to protect all children and young people who play football, enabling them to participate in an enjoyable and safe environment
- To deliver quality assured child protection training and build a network of tutors to facilitate this delivery, in conjunction with, and supported by, the NSPCC
- To demonstrate best practice in the area of child protection
- To promote ethics and high standards throughout football

## BOX 2

The *Handbook* introduced the main struts of the FA's policy and strategy: focus on the welfare of the child; awareness of the legal framework applying, such as the Protection of Children Act 1999; appropriate procedures to recognise and refer abuse and suspected abuse; preventative measures to minimise risk to children; codes of conduct. The Appendix to FA rules, introduced in 2001 reflects the seriousness underpinning this:

*Any act, statement, conduct or other matter which harms a child or children, or poses or may pose a risk of harm to a child or children, shall constitute behaviour which is improper and brings the game into disrepute.*<sup>4</sup>

The *Child Protection Policy*, with a foreword by the FA Chairman indicative of support at the highest level, states four aims, reproduced in Box 2. It

includes requirements that the PL, the FL and bodies affiliated to the FA through the County Associations should establish a policy statement in their rules encompassing child protection; and states as a clear objective that coaching staff, medical staff, referees, members of the PL and FL, the CFA structure and Charter Standard<sup>5</sup> clubs should be

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<sup>2</sup> *Football Education For Young Players "A Charter For Quality"*, October 1997

<sup>3</sup> *Child Protection Procedures and Practices Handbook*, The Football Association Limited, June 2001

<sup>4</sup> *The FA Handbook Season 2004-2005*, p. 398

<sup>5</sup> The Charter Standard kite mark was introduced by the FA in 2001, aiming to set a quality standard for children's football. The criteria for the award include adherence to the FA's child protection policy, and at least one person at the club having completed the FA's child protection workshop. Whilst the IFC has heard, outside the club and county structure, some doubts expressed about the focus on process, it heard little other than enthusiasm for Charter Standard amongst club personnel.

provided with on-going training in child protection. The principles underlining the *Policy* are unequivocal: the child's welfare is paramount; children and young people have a right to be protected from abuse; there must be co-operative working with those bodies with statutory responsibility for child protection.

To implement the policy, the FA developed a strategic plan, issued in November 2000, which it has monitored and kept broadly on course. Commitment in 2003 to meeting all the NSPCC's nine national standards (see Box 3)<sup>6</sup>, by 2008, means that these became the principal driver and prompted a new 3-year overview in 2004, aligned with the standards. Furthermore the FA commissioned an ambitious research project, led by a major specialist in child protection in sport, Professor Celia Brackenridge, to monitor and assess the impact of the strategy. Scaled to run for 5 years (2002-2006), it was to be the biggest ever research project in sports studies<sup>7</sup>. At Lilleshall (the base for some FA departments and, until 1999, for its School of Excellence), an experienced staff of 8, reporting to the FA's Company Secretary, comprised the child protection team. Thus the investment in the programme, both human and financial, was significant, again underlining the FA's commitment to it.

The FA, and the PL and FL, have clearly addressed compliance with the NSPCC national standards and the criteria accompanying them. **Procedures and systems** exist and are widely available; designated persons responsible for child protection have been introduced, also referral and complaints processes. **Prevention** is addressed by vetting processes: a Criminal Records Bureau (CRB) check for all those working in youth football is mandatory. Other

#### NSPCC nine standards

1. **policy:** any organisation providing services or activities for children and young people under the age of 18 should have a child protection policy.
2. **procedures and systems:** procedures provide clear step-by-step guidance on what to do in different circumstances. They clarify roles and responsibilities and lines of communication. Systems for recording information and for dealing with complaints are also needed.
3. **prevention:** measures to help minimise the possibility of children and young people being abused by those in a position of trust
4. **codes of practice and behaviour:** codes of practice describe what is an acceptable standard of behaviour and promote good practice
5. **equity:** measures to ensure the needs of all children and young people to be protected from abuse are addressed
6. **communication:** ways of informing, consulting and listening to all relevant parties about how children involved in the sport are to be safeguarded
7. **education and training:** opportunities to develop and maintain the necessary skills and understanding to safeguard children
8. **access to advice and support:** arrangements are made to provide essential information and support to those responsible for safeguarding children. Children and young people who are being abused are assisted to get help.
9. **implementation and monitoring:** action taken to ensure that the intentions of the organisation in relation to safeguarding children are taking place and to monitor and evaluate action and effectiveness

BOX 3

preventative measures include guidance on safeguarding children in particular footballing circumstances, such as transport and tours. Steps have also been taken to discourage and in some cases ban practices previously not recognised as posing a risk to children. **Codes of practice and behaviour** exist throughout the game and, in some cases, are binding under rules and regulations. **Equity** is underlined in the policy: a child's right to be protected is cited as one of three key principles underpinning it. Policy, and information about it, is **communicated** via many channels: rules, handbooks, guidelines, websites, seminars.

<sup>6</sup> Taken from *Standards for Safeguarding and Protecting Children in Sport*, NSPCC, 2003

<sup>7</sup> Funding problems led to curtailment after year 2.

Information about external expertise and resource – police, social services – is prominent in much of the child protection literature. There is also an FA-NSPCC child protection Helpline, which is well-publicised. The FA's Child Protection Unit (CPU) provides **access and support** for child protection staff, complemented by specialist posts in the PL and FL. The expertise of external child protection agencies is drawn upon at national and local levels and working partnership with them at clubs and counties is required.

**Education and training** has been the predominant focus. The FA has devised a comprehensive and sophisticated training programme in child protection and best practice which reaches football practitioners and also parents/guardians, referees, and administrative staff throughout the game – PL clubs through to grassroots. A continuous programme of training supplies around 250 tutors – from different parts of football, including referees – to deliver the workshop and some 25 mentors to support, advise and quality-assure the product. Complementing the core 3-hour workshop is an alternative simple step-by-step “guide” with CD ROM to run on a home PC. For parents there is the interactive *Soccer Parent* course on the FA website. Additional in-service training for designated staff has been introduced. The FA, PL, FL, counties and clubs have introduced or modified rules and regulations to ensure **implementation** of the policy, also measures to monitor **compliance** with them, and with defined standards.

To enable all this, the infrastructure has needed new systems. And to win commitment, careful marketing of new requirements and practices to the football community has been, and remains, a necessity. The whole has comprised cultural change on an awesome scale. Moreover there is a considerable network of critical dependencies. The FA has

regularly underlined the importance of working with partners. A good interface with the work separately undertaken by the PL and FL is vital. Without the consistent, committed help of the counties the policy can have no effect at the grassroots. The police, local authorities, schools, education departments, social services, Area Child Protection Committees (ACPCs), and parents and guardians are just some of the sources of expertise, experience and knowledge, each of them unique, to which the child protection programme must have recourse. On their help, understanding and co-operation the football world has to rely, and on the internal dependence which looks for support and backing from the top of each participating organisation.

Since the mid- to late nineties the public has become increasingly aware of child protection issues and more alert to precautions that parents should expect of organisations into whose care a child is entrusted. Some dreadful cases of harm to children have resulted in public enquiries, legislative changes and a spotlight on society's responsibilities. Because of the nature of the sport, the spotlight is perhaps more searching when focused on football than in other areas. But football is just one, not very large section of society taking responsibility and recognising its duty of care. Failures in national and local systems ostensibly in place to protect children are shocking, but not for football to address. The only question for football is whether its policies, action plans, rules, training and preventative measures mean that, when young people are in the care of football, they are as safe as football can make them.

This question the IFC took into its enquiries.

## GRASSROOTS

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The IFC accessed grassroots football in the following ways:

- discussion at the FA's three County Support Group meetings in February 2005 at which a total of 36 senior CFA representatives were present along with relevant staff from FA headquarters
- discussions with CEOs and/or other staff at nine individual counties
- group discussion with around 50 Charter Standard club representatives at two separate meetings hosted by CFAs
- discussions with five individual Charter Standard clubs.

There are 54<sup>8</sup> county and affiliated associations. CFAs are governed by a Council of members who are unpaid, led by a Chairman. Positions on the Council are a mixture of appointment (from the staff), award (e.g. for long service), nomination (from the leagues) and other volunteers. A CFA oversees the organisation of leagues and clubs in its area that are affiliated to the FA. They are not involved with non-affiliated clubs, of which there are many. The CFAs carry numerous roles and responsibilities. These include: financial management of the CFA; disciplinary matters arising from games played under the county's auspices; establishing and monitoring rules and regulations for the playing of football, and applying associated sanctions; player registrations; sponsorship approval; control of cup and other competitions; referee and match officials administration; overseeing youth coaching and development; administering the Charter Standard Scheme; liaison with schools and the local Schools FA; fixture lists administration; staff recruitment, including attracting and retaining volunteers. Some counties also have their own football pitches which require management and maintenance. Much of the county work is organised through standing committees. Almost everything is dependent on the services of volunteers. By and large volunteers are a dwindling population and mainly male and elderly.

The roll-out of the child protection strategy in the last few years has introduced additional responsibilities. These include: establishing and implementing a child protection policy; designating a Child Protection Officer (CPO) at the CFA and providing training; organising and administering CRB checks (staff, referees, Charter Standard club personnel etc); administering the delivery of the FA child protection workshops; establishing systems for child protection referrals and record-keeping; monitoring child protection implementation and compliance; funding aspects of the programme such as workshop fees; and introducing Youth League Welfare Officers (YLWOs) into grassroots leagues. These requirements put inevitable strain on an already stretched resource.

The IFC found a great resilience within the CFAs, understanding approval of the child protection initiatives, and a positive attitude to addressing the new issues and requirements. This reflects well on the long-standing relationship between the FA and the counties, and counties' commitment and impressive capacity to take a pragmatic and practical approach to the challenge. The IFC encountered no one who felt the measures that were being introduced were disproportionate to the issues. CFAs were accepting of their role with regard to the strategy, and of their responsibility for the welfare and safety of children

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<sup>8</sup> As listed in *The Football Association Handbook Season 2004-2005*



playing football under county auspices.

Everyone to whom the IFC spoke expressed praise and respect for the team at the FA's Child Protection Unit, commending its work, the attitude and dedication of the staff, and the unit's professionalism and knowledge. Individuals in the team were known at county level and many people had personal contact with them and felt the CPU represented a resource on which they could call. At the same time concern was voiced that the unit is over-stretched; largely this served to increase admiration for its achievements.

The IFC believes that the CPU deserves great credit for establishing this credibility and for its successful dissemination of the child protection strategy across the diverse county network.

The IFC found child protection policies in place at the CFAs, also clear understanding of the strategy, its purpose and the drivers behind it. County Handbooks include the FA's Child Protection regulations<sup>9</sup>. Affiliated clubs appear to be cognisant of child protection basic requirements. The IFC examined 11 club and league handbooks/ constitutions/code of rules from four different counties, including Charter Standard and non Charter Standard clubs. All contained reference to child protection policy either by reproducing the FA's regulations on child protection; or by a short paragraph stating that the FA's child protection policy is part of the club/league rules. Three of the documents included the name and contact details of CPOs/Club Welfare

Officers (CWOs)<sup>10</sup>. One, Mitcheldean Sports Club in Gloucestershire, very usefully and clearly includes explanation of the

good  
practice

FA's position; the aims of the FA's policy and the key principles underpinning it; FA courses that include child protection training; and a brief overview of screening processes. The club also gives the number of the NSPCC/FA Child Protection Helpline as well as full contact details for its CPOs and a note that they will have attended the FA child protection workshop. This reads well.

The IFC notes that some CFA information for new clubs helpfully includes reference to child protection measures.

The IFC found a number of examples of good practice in disseminating the child protection policy, raising awareness and setting clear targets to advance implementation. For example counties produce an annual Football Development Handbook, based on a standard FA format. All those the IFC examined included a section called *GOAL*<sup>11</sup> – *Child Protection and Best Practice*, reproducing an FA text. The Handbooks also contain individual sections covering achievements of the previous year and aspirations for the current year. In some counties, Cheshire and Westmorland, for example, specific child protection matters feature. The Birmingham FA has formulated a letter to aspirant Charter Standard clubs to explain the child protection policy and CRB checking, drawing on what staff have learned themselves at the FA workshop, and underlining that,

good  
practice

*The FA and Birmingham FA take the role of Child Protection very seriously and offer training opportunities for everyone involved in the game to ensure that managers/coaches/volunteers/parents etc have the knowledge to ensure that all children are safeguarded within our clubs.*

<sup>9</sup> As in *The FA Handbook Season 2004-2005*, p. 398

<sup>10</sup> The title CPO is used at county level, at club level the designated person is a CWO – but the IFC found the labels used interchangeably. The range of labels and titles can be confusing (see p. 46)

<sup>11</sup> GOAL being the banner logo adopted by the FA for its child protection work.



CFAAs do have some misgivings, however, which may be grouped under 4 broad headings:

- communications and the pace of change
- resources and the management of expectations
- FA understanding of the realities of grassroots football
- consistency and maintaining standards.

These were recurrent themes in discussion of individual aspects of the child protection programme, discussed below.

### **Child Protection Officer role**

At county level the CPO is generally either a part-time volunteer or a member of staff who has taken on CPO duties as part of his/her other work. They are often unpaid; some get a small honorarium. Training for the role is provided through the FA's 3-hour workshop, with additional training, including legal aspects of the role, also provided. This has been developed in conjunction with the NSPCC and its *Time to Listen* programme: a new 2-day course was being piloted in Cambridgeshire in summer 2005<sup>12</sup>.

Some counties have not found it easy to identify a CPO: a mixture of reluctance from an already-stretched workforce, increasing difficulties in finding volunteers, and anxiety about what might be involved. County officials share concerns about finding someone with the right skills and personality. Some have looked – not always successfully – to Council members to take this on. Others have drawn on local contacts and networks to offer one of their volunteers or employees already engaged or

experienced in such work for a limited time each week.

*It is thus impressive that, in every county, a CPO is in place and trained to handle child protection matters.*

It is important that their identity is known. The IFC notes that the FA is producing new guidance to clubs on developing a child protection policy and hopes the FA will encourage the inclusion of clear contact details of the CPO or CWO in their literature. The IFC suggest that the CPO should be more widely listed, with a name and contact number, on CFA materials, including handbooks, and in information for young players.

Even with a CPO in place, residual anxieties remain. When the part-time CPO is not there, calls from distressed or angry parents still have to be taken, often by someone, including the County Secretary, who feels ill-equipped to deal and apprehensive of giving the wrong advice or saying the wrong thing. Having raised the profile of child protection, deferring such calls until the CPO is next in isn't seen as an option. Several counties wondered if the FA is sensitive to the difficulties.

The FA helps with recruitment by providing a person and job specification to guide counties towards the right appointment. This is appreciated and the specification appears appropriate. But appointment of a CPO seems often to come down to asking for a volunteer at meetings. This can be productive. But do the right kind of people volunteer? Volunteers won't necessarily match the specification. As one person put it, "Qualifications can't always come into it – you can't be fussy". The IFC believes that the FA's CPU recognises the potential skills gap that volunteer CPOs will encounter and that its CPO training programme addresses this. However, consideration might be given to adding to job/person specifications some brief guidance for the recruiter on how to

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<sup>12</sup> The CPSU has quality-assured the course

amend a standard specification so that it can relate to the skills an apparently mismatched volunteer has, and so that volunteers will be encouraged, rather than daunted, by their new task.

The amount of work at county level to provide the appropriate safeguards is significant. The IFC feels some concern for the dependency on volunteers, whilst both respecting and admiring the work they do. In such an important area, it would be preferable to have a properly funded resource at county level on which the county infrastructure could more reliably call and which would feel supported, appropriately valued, willing to acquire new skills and to develop the job in line with an evolving environment. With appropriate funding the counties would also be in a position to recruit, taking into account particular local needs, including appropriate gender and ethnic profiles<sup>13</sup>.

### **FA Child Protection and Best Practice Workshop**

The workshop has been a major success in the FA's strategy. Achieving the target of 100,000 having done the workshop in the 4-year period since 2001 is remarkable and though there are those that cavil at quantitative measures, it can hardly be denied that 100,000 people knowing more about child protection than they did four years ago is a good thing. The IFC also notes that the FA has received national recognition of its success with the award of a UK Skills National Training Award in 2004.

A principal aim of the workshop is to raise awareness of child protection issues. The IFC's evidence is that this is being met. Without prompting, virtually everyone the IFC invited to comment on the workshop said, in the course of

praising it, that it is good, it is relevant, it had increased their understanding.

Invited to describe the impact of the workshop at their office, club or league, the consistent response was that people are "more aware": see also Box 4.

#### *reported benefits of the FA Child Protection and Best Practice Workshop*

- increased awareness
- changes in the way people work
- more confidence in particular situations
- less "fear" about saying or doing the wrong thing
- less shouting in front of youngsters
- new agreed practices
- helping CPOs "sing from the same hymn sheet"
- discussing best practice with parents

BOX 4

Trainees said they noticed a change in behaviour at the workshop, from a wary audience sitting with arms folded at the beginning to an animated and interested group at the end.

*Much of this is credit to the design of the workshop and to a successful FA programme of training tutors to deliver it.*

The IFC thus found a ready buy-in amongst county officials, leagues and clubs and very little quarrel with the workshop content. Frustration was expressed about some infrastructure and communication aspects, however, as under:

- there is no follow-up to the workshop. This can make the benefits seem short-term and the on-going impact difficult to determine. Certification operates on a three-year cycle but what happens in between?
- there is widespread uncertainty as to how re-certification, due in 2005 for large numbers, will be handled. Will it mean doing the workshop again? doing a shortened or new version? or there being perhaps simply a checklist?

<sup>13</sup> The FA advised the IFC that no CPOs are from ethnic minority backgrounds

- throughput is mainly Charter Standard people. Many counties haven't had chance to look at other sectors of importance. Volume is a resource issue.
- especially in big counties, administering the workshop can mount an enormous administrative challenge: advertising, collecting fees / making payments; finding venues; organising tutors, support etc. CFAs cannot afford to employ people on the scale required, nor readily find enough volunteers
- at the beginning the FA had a clear intention to include a mentoring and monitoring system for the workshops and ensure the maintenance of appropriate, consistent standards. This seems to have crumbled; no one recognised its being in place
- a condition of Charter Standard status is that at least one person at the club must be certificated as having done the workshop. There is no system, nor widespread county capacity to install one, for monitoring this. Counties acknowledge that they would be unlikely to pick up that the workshop graduate had moved on to another club or region.

The IFC found the last point of serious concern. There are solutions. Birmingham FA, for example, has recently audited all the Charter Standard clubs in its area to check criteria are currently met;

good  
  
 practice

Surrey does checks on an annual basis. But on-going systems are needed throughout the network; and re-accreditation will be a further challenge. The need extends to monitoring CRB certification too. There is currently no ready way of knowing that a person doing a job that requires a mandatory CRB check is certificated. There are some individual initiatives to address this. In the

West Riding, an impressive system of ID cards carrying the individual's photograph and CRB number has been introduced. ID cards have been trialled in other regions too and by individual clubs and leagues. But they are relatively expensive on a small scale. Also the FA is understandably wary of individual schemes proliferating when a national, cost-effective scheme linked to case management and sanctions would evidently be preferable. Some form of licensing within youth football may be another alternative. The FA needs to examine a range of options and to share its thinking if one-off remedies are to be contained. But monitoring gives way to higher priorities for resources in many counties.

Finally, two marketing points. The IFC is glad to note that charges for the workshop are capped at £20 and hopes a ceiling will be maintained to protect the training from high profit margins. Secondly, the IFC was surprised how often it was put to them, in a very positive way, that the workshop is mis-named. It is, say many people, as much about protecting oneself from behaving carelessly and putting oneself at risk, as safeguarding the welfare of the child. This "sells" the workshop to those reluctant to participate and while it is important not to submerge the driving purpose, the FA might wish to think about labelling – and perhaps note that one CFA has smartly promoted the workshop to referees under the title "Referees Protection Workshop".

## CRB checks

The introduction of CRB checks has been a major exercise, breaking new ground not only for the FA but for sport in England. Sport is, of course, only one of many sectors with which the CRB deals. But sport penetrates large swathes of society, while its interface with young people is

massive. And sport involves large numbers of people. As the FA has pointed out, if everyone with any involvement with young people in football alone were required to have a CRB check the Bureau would be swamped, never mind the numbers from the rest of sport. It is perhaps remarkable, given the numbers, that CRB-checking in football (and other sports and youth organisations) has been accepted with so little public demur. The check is quite intrusive and many find it bureaucratically irritating. The reasons put forward for its acceptance go back to concerns for the protection of children in sport generated in the mid-nineties, and general public anxiety following a number of tragic child abuse cases in recent years. In some cases major public enquiries and legislative change have been, and will be, the consequence. The findings of the Bichard enquiry following the conviction of Ian Huntley for the Soham murders in 2003 was high on the public agenda during the period of the IFC's examination of child protection in football.

This is the backdrop then, to the introduction of CRB checks as an integral part of the child protection policies implemented by the FA, the Premier League and the Football League.

As this report has previously said, football did not suddenly wake up to child welfare at the turn of the century. It was alert to the risks to children from unsavoury and criminal elements in society. Systems for checking the criminal records of those seeking to work in youth football had been introduced. These ranged from pre CRB systems<sup>14</sup> through to self-certification. The decision to accept only an official CRB check was taken in 2002 in the interests of efficiency and consistency

and, above all, security, so that football could be confident of the integrity of the check, in control of the use to which it would be put, and informed about the source and relevance of data that is used.

In 2004 the FA contracted a private company, the Media Group, based in Nottingham, to handle its CRB checks. The Media Group, on behalf of the FA, handles CRB checks for all affiliated football except the Premier League<sup>15</sup>. From January 2005 the FA has refused to accept any CRB check certificates other than those processed by its CRB Unit (CRBU). An FA-approved CRB check is a condition of employment in a growing number of jobs in football, and reaches way beyond the obvious, such as youth coaches, to medical staff, match officials, academy personnel, CPOs, YLWOs, FITC staff and many others.

The throughput is vast. In April 2005 the CRBU reported receiving between 600 and 800 forms a week. These arrive with the required identification for the check (passport, driving licence) which the CRBU aims to return to the applicant within 24 hours. It told the IFC in 2005 that this target is being met. The IFC heard nothing to indicate the contrary. The achievement is impressive.

The CRBU logs and processes the forms and forwards them to the CRB. About 8%<sup>16</sup> of the returned forms carry disclosures which require further enquiry. On receipt of further information the case may be referred to the CRBU panel of 9 people from a cross-section of football, the police, the social services etc, or to the case management desk at the FA in London. On satisfactory completion of the check, applicants are issued with a certificate, valid for three years, bearing a unique CRB number. The CRBU

<sup>14</sup> Such as List 99 checks and checks against the Police National Computer (PNC) where permissible. From February 2002 checks under provisions of the Protection of Children Act were withdrawn by government.

<sup>15</sup> See pp 41-43

<sup>16</sup> Compared to 33% of all males in England having a criminal record. Figures supplied by the CRBU

confirms that the majority of its traffic is from grassroots football.

At the other end from the CRBU is a more complex and dispersed machine within the counties. Its role includes: identifying who must be CRB-checked; providing them with forms and, often, helping them to fill them in; as of 2005, providing local verification of the documentation submitted; providing administrative support for the local training of verifiers; supplying advice, information and guidance to applicants; despatching the forms; monitoring who has and has not applied for/obtained/not applied for/not obtained the CRB check; managing funding and payment arrangements; fielding enquiries about the progress of the application. The counties have shouldered this but many have felt the weight of the administrative burden. Many volunteers have no appetite for this kind of work which, especially for the older generation, they feel is a considerable departure from the county football work they originally volunteered to assist.

The IFC found no questioning of the need or appropriateness of CRB checks but did encounter doubts that the FA entirely appreciates the administrative demands or the slender nature of the resource to meet them. In the case of CRB-checks for referees, the deadlines set for completion of the process were regarded as totally unrealistic and the exasperation was exacerbated by lack of consultation and poor communications (see page 21). These grievances were particularly current at the time of the County Support meetings in February 2005 where they were shared with the FA which took note and subsequent remedial action (see page 21). The FA and CRBU also acted swiftly to address problems arising from the barrier the CRB form and process itself seemed to present. A system for verifying and forwarding CRB forms and accompanying documentation locally was

introduced in 2005. This has been effective and though, for the counties, it represented another trawl for willing volunteers to be verifiers<sup>17</sup>, and a further tranche of training, the resultant resolution of local difficulties was rewarding. The CRBU's assistance in this is widely appreciated. *Visits by the unit's manager to consult locally, discuss the way forward, share problems and assist with training was cited with approving gratitude to the IFC on several occasions.*

Nonetheless, all this still has to bed in. In IFC meetings with Charter Standard clubs and counties, apprehensions about the procedures surfaced regularly. Verifiers remain, whilst willing, a bit uncertain of their role, nervous as to what their accountability might be. The security system whereby verifiers are given a unique pin number to enter on the forms they have checked seems to be not wholly understood and those waiting to receive their pin number are uncertain what to do. The overwhelming criticism, however, is of the seemingly excessively long period between submitting the CRB application and receiving the disclosure back, aggravated by the silence that accompanies the interval. Examples were given to the IFC of several months of waiting, for which the CRBU is blamed<sup>18</sup>. The reaction is a mixture of annoyance and, again, uncertainty. Can the individual whose application is pending still be employed? If s/he works with children, must s/he be supervised in the interim (strains on resources again)?

Finally, a new anxiety is looming. As with the workshop, a new 3-year cycle is on the horizon and there are questions about

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<sup>17</sup> The FA also trained members of its regional manager network to be verifiers, including regional managers for referees

<sup>18</sup> Perhaps unjustly: the CRBU has no influence on processes at the CRB in Liverpool to which it sends the forms; it cannot control the time needed for any further enquiries when disclosures are returned; it is at the mercy of clubs who may assemble forms over several weeks or months and send them in as a batch.



phase 2. There will need to be a big follow-up exercise from phase one. Who will do the chasing? CRBU or the CFAs? CRBU, it is understood, is designated to send the documentation out – but what if it doesn't, or misses people, or doesn't get a response? There is uncertainty about who does what. Some general attention to timely communications may be beneficial.

The common theme behind the majority of these issues is communication and consultation. In such a major change programme this is almost inevitable. Over the 10-month period that the IFC was in dialogue with the counties, it noticed a diminution in complaints about poor communications and commends the FA for its recognition of some specific problems and steps taken to address them. There are also several long-standing communication stratagems. The County Advisory Group, which the FA and CRBU consults, comprises senior CFA staff and gives the counties a direct voice on CRB evolving practice: some would like this group to have greater status. The FA's regular bulletins on child protection on its website are attractive and current. The distribution of GOAL briefings includes CFAs, child protection tutors, FITC personnel and parts of government. They are attractively laid out and well-received. However, they do not serve as quick information and practice updates to practitioners. A rapid release e-mail system for quick reassuring communications to the coalface might help relieve some of the bewilderment at working level as to what is happening and why. It might extend to a feedback function: the counties – clubs and volunteers as well as the executive – have ideas worth capturing.

Stepping back from the local difficulties, CRB checking has been a substantial achievement. Apart from one discrete group of stakeholders (see page 21), the IFC encountered little resistance to the principle. Asked whether the requirement

on individuals to be CRB-checked is a deterrent to volunteers or job applicants, the answer was either "no", or "decreasingly"; or a robust assertion that if people didn't want to be checked then football didn't want them.

What is the benefit to those the system seeks to protect? There is a practical and reassuring purpose. The CRB, as it itself explains,

*is set up to help organisations make safer recruitment decisions<sup>19</sup>.*

The advantages of this to the county network are apparent, especially if the counties can share decisions on individuals who may be unsuited for work with child footballers. The County Administration System (CAS) is a networked database, in place in all counties, that is, amongst other things, intended to inform and facilitate recruitment decisions. Thus appropriate personnel in county X, in receipt of an application from A for work in youth football, should be able to see on screen that county Z decided not to employ A: this decision suggests risk. As at August 2005, CAS did not carry this function. There have been, and possibly still are, technical problems with CAS that have caused delays; there is also on-going consultation about the use made of essentially sensitive decisions. The FA hopes this function will be operational before the end of 2005. In the meantime, the Media Group provides a bi-monthly update on CRB information and outcomes but this inevitably cannot be wholly current, though counties told the IFC it is regular and useful.

No one claims that the CRB check is foolproof, that it will protect youth football from elements in society unsuitable for close contact with children. It does not pick up those who have not been convicted for relevant offences or those who will offend in future. The

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<sup>19</sup> See the home page of the CRB website at [www.crb.gov.uk](http://www.crb.gov.uk)

police were, amongst those with whom the IFC discussed CRB checks, the most sceptical of their being worthwhile<sup>20</sup>. Moreover, the categories of those who should or must be CRB-checked are not foolproof<sup>21</sup> and, within football, not wholly understood (see page 42). The consensus seems to be that the CRB check is a snapshot in time, one measure amongst many – possibly better and more important – ways of protecting children. The point, however, is that the CRB policy is to make it increasingly difficult for those that pose a danger to children to be in the game. The CRB check contributes and sends a clear signal that this is football's intention.

## Referees

Referees proved to be the most contentious discussion point the IFC encountered. The key points are:

- the FA's policy is that all referees must be CRB-checked as a condition of re-registration
- the original deadline for this was June 2005; this was subsequently extended to December 2005
- the counties administer the process, including collection of a £7.50 fee for the CRB check
- the FA also asks existing referees to complete the home-based *Guide* version of *Child Protection and Best Practice*, and submit the questionnaire for assessment and approval; new

<sup>20</sup> Figures provided by one constabulary suggest that around 5 million people in the UK will have criminal records of which c. 120,000 will be sex-related convictions, of which, in turn, a very small proportion will be cases of child abuse. It is also suggested that only around 6% of child abuse criminals are known. The point is that the CRB certificate should not be relied upon as a guarantor of low risk.

<sup>21</sup> A finding of the Bichard enquiry was that Ian Huntley, the school caretaker convicted of the Soham murders, was not subject to a CRB check (his girlfriend, a teaching assistant, was).

referees must complete the workshop.

Resentment, even hostility to all of this, appears to have been pretty widespread amongst the referee community. Counties, alert to a serious existing referee shortfall, worried when referees suggested they would give up refereeing rather than comply. They were also daunted by the number of referees to be pushed through the process by June 2005 and saw this as another example of the FA not facing reality. As someone said at one of the County Support Group meetings in February, "whether it's 600 or 6,000 refs, it's still impossible to complete the process by June". The FA contracted a mailing company to distribute the CD ROM version of the *Guide*, which was also hitting resistance, directly to referees, many of whom then phoned the (unsighted) counties about it to convey their unenthusiasm. Some exasperation at county level resulted.

The FA, again to its credit, promptly took a number of corrective steps. The deadline was extended; immediate action was taken to re-route distribution of the CD ROM via the counties; local verifying provided on-the-spot help with completing the forms; and, controversially<sup>22</sup>, the FA Board decided that the £7.50 fee would, during 2005, be met centrally for referees. The counties took their own measures too. The North East and the Birmingham area, for example, were amongst those to set up specific referee workshops to provide explanation and assistance. These are reportedly well-received. Whilst no one seems to be claiming that the referee population has

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practice

<sup>22</sup> It was made clear to the IFC that the counties would have preferred to have been consulted. However, whilst some felt the decision was wrong, on the grounds that referees are the only sector at grassroots who are paid, through match fees, for their involvement in local football – everyone else has to pay – others expressed great relief that a sensible step had been taken to relieve the crisis.



been wholly converted, the heat seems to have gone out of much of the antagonism.

But some discontent remains. The IFC talked to some referees about the issues. One of its Commissioners is a practising referee himself who has done the workshop and so had opportunity to understand the context, and form some assessment of the strength of feeling. Mostly, confirmation of the counties' interpretation of the immediate situation came through. In a typical group of six referees of different levels with which the IFC met in June 2005, one had attended the workshop (which he found well-presented and informative); four had obtained the CD: of those only one had completed and returned the form; one had completed the CRB check; one had done nothing at all. Four of the six viewed the child protection requirements as unnecessary, feeling a common sense approach is good enough. All of them welcomed the FA decision to meet CRB costs. Referees generally, they told the IFC, felt more could have been done to make the whole process and the reasons for it clearer, in particular its relevance to referees. Some counties conveyed to the FA that some of the communications with regard to referees could have been better worded and softer toned.

Pervasively, both directly and indirectly, the IFC hit a real sense of grievance amongst referees that they do a difficult job for little reward in usually hostile circumstances; they are not appreciated; they feel undervalued. The likelihood is that the whole vat of resentment will boil up again when the renewal cycle comes round in three years time, especially if the costs of the CRB checks has reverted to the referees by then. The IFC has no locus on refereeing matters and reports its experience for the record.

In the context of child protection the wider issue is serious. None of the group of referees the IFC met intended to stop

refereeing, but at least one was disinclined to bother re-registering. All knew of referees who were not going to re-register, anecdotally because they "can't be bothered with the hassle". This tendency is recognised across many counties. The FA is able to show numbers holding up and suggests that seasonal variations and drop-outs are no worse than in previous years. But of the 33,000 or so referees in the system, it is not clear how many are actually registered or preparing to re-register. Estimates put to the IFC in the regions were that there could be a shortfall of as many as 7,000 registered referees. In the 2004/05 season Surrey, for example, had 1,500 registered referees; up to mid-June 2005 only 961 had re-registered.

A critical point is that referees who do not register do not necessarily stop refereeing, and that child protection requirements may be a factor contributing to a rise in the numbers of referees in this category. The IFC found no indication that the majority of clubs will ask for a referee's CRB check number before allowing him to officiate at a match; the implication was that people are usually just grateful to have anyone willing to referee. It was also suggested to the IFC that the unregistered referee is more likely to be lenient to avoid any reporting. This is unsubstantiated. Clearly evidenced, however, is the growth of commercially-run small-sided football which increasingly attracts referees as it pays generous match fees. Child protection training and CRB checks appear not to be required. The IFC understands the FA is in discussion with enterprises which stage these events. What this suggests, however, is that numbers of children are under the supervision of referees who may not be sensitive to measures to safeguard them or may not be suited to work with children, and that those enabling this have perhaps little awareness of the likely wider risk to children from the individual's encounter with them at a football game.

good  
practice

There is no bolt-on answer to many of these issues. There is a strong message about communications, though the IFC recognises efforts that have been made, from Dorset CFA's dedicated Referees' Brochure (including full-page guidance to child protection training for referees), through to the support for the workshop given by the Chairman of the Referees Committee<sup>23</sup> and the 2005 Cup Final referee<sup>24</sup>. Most tellingly, the father of one of the murdered Soham schoolgirls, himself a referee, addressed the FA's Child Protection conference in 2004.

There is another message about marketing and some pointers towards a more hybrid approach to both training and vetting. The IFC endorses the FA's position that referees should participate in the education programme but one size doesn't fit all<sup>25</sup>. The FA has already recognised that the CD is not wholly successful and is looking to move to an on-line version of the *Guide*: time will tell whether this will suit the less computer literate and endowed.

## Charter Standard

With Charter Standard things get easier! The scheme was developed in 2000 and was run as a pilot prior to its formal launch in 2001. In the years since then it has become well-established and integral to the FA's youth development programme. The workshops and CRB checks have been accepted and welcomed, the former treading the ground nicely for the latter.

<sup>23</sup> "I completely endorse the importance and relevance of this workshop to refereeing", quoted in *FA Learning – Briefing*, the newspaper of the FA Match Officials Association, February 2005.

<sup>24</sup> "For me the best thing the FA are doing is making abuse unacceptable in all its forms. Referees are no different to any other group in football. We all believe we are above reproach and that we should not have to bother." *Ibid*.

<sup>25</sup> One of the few criticisms of the workshop is that it is too "coach-oriented" and the tick-lists ditto.

The IFC found all Charter Standard clubs it met were familiar with child protection requirements and compliant with them. There was general enthusiasm for the workshop, with particular approval of its success in raising awareness.

The Charter Standard scheme is clearly contributing to embedding an informed understanding of child protection in grassroots football, within a broader success story of establishing monitorable standards, encouraging good practice and both incentivising and rewarding quality. Charter Standard status requires codes of conduct for officials, coaches, players and parents and though these vary in form and content (see also pages 34-35), they have bearing upon child protection. A further criterion is that a club representative should also have done the FA *Soccer Parent* course: many clubs make a particular point of promoting the course to parents.

The scheme has three levels for youth football<sup>26</sup>: Charter Standard, Charter Standard Development, Charter Standard Community. Qualification for the last two depends on additional criteria including a minimum number of teams, the existence of a 3-5 year development plan, a

### *Charter Standard clubs*

end 2002 :	700
end 2003 :	1090
end 2004 :	1930
end June 2005:	2319

BOX 5

Schools Liaison Officer and a Volunteer Co-ordinator. The numbers of clubs at each level are rising steadily: see Box 5. At its launch, the target for Charter Standard was 2,500 clubs by 2006. The scheme, in mid 2005 was less than 150 clubs short<sup>27</sup>. This is impressive and encouraging, especially in conjunction

<sup>26</sup> And, additionally, an adult club level

<sup>27</sup> The figures include around 260 Community Clubs which is rather shorter of its target of 500 clubs by 2006, and Development Clubs.

with the positive reaction to Charter Standard in counties and their clubs. In some areas, Durham for example, the prospect of a Charter Standard league is real. There are three areas where the IFC believes the FA might consolidate the scheme and better safeguard young people:

- monitoring
- rewards
- reaching out.

### *Monitoring*

On page 17 this report discusses the difficulties CFAs face in monitoring clubs. The continuing growth of Charter Standard will, ironically, increase the problem. This is quite serious, given that the purpose of Charter Standard is to promote identified standards that are then maintained, and to provide some insurance that at the best clubs i.e. the Charter Standard clubs, children will be properly supervised and cared for to these standards. This offers reassurance for schools, parents and guardians. It's a kind of football MOT. But, without monitoring, that assurance is weakened and the kite mark might even be misleading. The problems for CFA staff are practical and go beyond checking names against a list. What, for example, if it's the level 1 coach who leaves a club and the new one is not level 1? Does the county intervene? Give him a deadline? What if it's missed? Stop the club training? Strip the status because of one coach? The IFC encountered some who said they would be reluctant to withdraw the standard for a sin of omission on the part of maybe just one of a club's teams. This is a sympathetic attitude and in keeping with the ethos and buoyancy of the scheme. But worrying. The FA<sup>28</sup>, rightly, asks that in such circumstances there should be evidence of plans for

corrective action. But much of the time the county doesn't know who and what has changed: a club-wide check might not be made even during a County Development Manager or Football Development Manager visit – it isn't always feasible. In turn, this means that useful information is not being entered on CAS. The issue should be addressed – provided any solution is very, very simple.

### *Rewards*

A major advantage for Charter Standard clubs is that they are entitled to use the FA logo in promotions and for fund-raising. The IFC found several instances of success, and of success building success. One youth club, for example, having been awarded £800,000 for a new clubhouse from the Football Foundation found that in itself a powerful marketing tool with local potential sponsors.

Football Foundation policy backs the FA's child protection strategy. Under its small and main grant schemes, an applicant club must have a child protection policy if the club is working with under 18's. Those who have, or are working towards, Charter Standard status are favoured. Copies of the child protection policy are requested with the application and the CFA is asked to verify the club's actual or aspirant Charter Standard status. If a club is not affiliated, the documentation is still required and its adequacy judged by assessors at the Football Foundation. Because the risks are potentially high, if child protection cannot be adequately evidenced then funding would be reviewed. The IFC's concerns are threefold:

- how much verification and assessing can the Football Foundation realistically be expected to do and from what knowledge base?
- how to balance the risk to children of funding a project with doubtful child protection credentials against those of not funding the project at all?

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<sup>28</sup> The FA confirms that Charter Standard status has been withdrawn from several clubs for failure to maintain the standard.

- is paper evidence enough assurance that key people within a project designed around young people are suitably trained and cleared to work with them?

The Football Foundation told the IFC that much of this is under current review. The IFC has no direct involvement with the Football Foundation but hopes the FA will offer its advice and experience in any review processes and promote synergy with its own strategies.

On a different note, the slowness of the CRB process is a real bugbear for clubs. A suggestion was put forward that a reward for Charter Standard status could be fast-tracked CRB checks! That apart, the suggestion was quite widely made that the reward list for Charter Standard could do with updating.

#### *Reaching out*

The IFC is delighted by the growth of the Charter Standard scheme but the number of football clubs for young people in this country inevitably means that it will be some time before Charter Standard is the majority, still longer for it to become the norm. Some county statistics provide a perspective. There are around 1,000 clubs in Gloucestershire; around 20 of them are Charter Standard. Birmingham has around 2,500 clubs, about 100 being Charter Standard. In short, the vast majority of affiliated clubs are not Charter Standard and many more are not affiliated and may have no child protection policies or practice. This is not to equate these clubs with poor quality and standards. On the contrary, the IFC was told that many of them are very good, conscientiously and well-run, with good disciplinary records and efficient basic administration. They simply lack the resource and infrastructure for Charter Standard. It thus seems a large gap between the 2,000 or so prestigious, kite-marked clubs – and the rest. Is it possible to reach out to the rest? In terms of Charter Standard,

obviously no: a standard is a standard and not to be devalued. But in terms of child protection, perhaps yes. The FA is looking to see CWOs at all affiliated clubs (not just Charter Standard) and YLWOs in place from the 2006-07 season. A target for making the CRB check a condition of affiliation for coaches by 2007-08 is also in the pipeline, and all adults in youth football by 2008-09.

The IFC welcomes these moves. The real success, however, will be when parents see Charter Standard clubs as the best and safest for their children. CFAs report this not quite to be the case at present: sporting success tends to win over child protection policies and good administration. The successful clubs need to be targeted and wooed. The IFC suggests that the Charter Standard accolade needs local publicity, and lists of Charter Standard clubs need to be readily accessible (websites, county handbooks).

To extend the CPU's embrace to unaffiliated clubs is impractical. Schemes such as Child-Safe are alternatives which can successfully reach this sector. Child-Safe is a police-backed enterprise that provides an easily-accessed local approach to organised activities for children, sporting and non-sporting<sup>29</sup>. The FA supports and endorses it centrally. Through perhaps website links and up-to-date, locally available fact-sheets, it would be good if the existence of Child-Safe could be promoted through the FA's network., along with similar community projects with a focus on safeguarding children.

#### **About children**

The FA has no direct interface with children itself. But there are four areas in particular where central guidance routes

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<sup>29</sup> Information about Child-Safe can be found on [www.child-safe.org.uk](http://www.child-safe.org.uk)

pretty sharply to children. These came repeatedly to the IFC's attention during the course of its enquiry.

The four areas are:

- parents
- photography and images
- scouts
- rules, laws and recourse.

Aspects of these, along with girls' football, are discussed later in this report. What follows is a brief comment on the topics in relation to grassroots football.

### Parents

Parents are often described as the biggest problem in youth football<sup>30</sup>. They bawl on the touchlines. They put winning before playing, being selected over taking part. They have high expectations and ambitions. They can seek to be parent, coach, agent and supporters club all in one. The FA's *Soccer Parent* course advises that the most frequent reason why children drop out of football is parental pressure. On the other hand parents are often willing volunteers.

Problems on the touchlines are very real. They do not, of course, extend to all parents. Often-cited examples of poor parental behaviour are listed in Box 6,

#### examples of poor parental behaviour

- loud, aggressive exhortation
- bad language
- audible criticism of a child's performance
- mockery
- abusing the referee
- violence to other parents
- antagonism towards a coach

BOX 6

<sup>30</sup> This was found by the Celia Brackenridge research team in 2002. A year later, the research found that "if the issue of parental behaviour in youth football was a prominent theme in our interviews last year, this year it

each of them a form of abuse.

Contending with this in grassroots football is more problematical than in the professional game. A league or county, unlike a professional football club, has no authority over spectators and no realistic sanctions. Charging a club with not keeping its fans in order is not always practical on the public pitches where a lot of junior football is played, though CFAs are known to fine clubs. Charter Standard clubs have a code of conduct for parents which they are asked to sign, and they point parents towards *Soccer Parent*<sup>31</sup>.

There are other innovative ideas: offering modest discounts if parents have the *Soccer Parent* certificate, for example; the one-hour talkshop to take parents through the downside of pressurising children. A red card system seems quite common, whereby parents are spoken to if they shout or abuse; then warned if they continue; and finally, if they persist, they are shown the red card and banned or fined. If they don't withdraw or the fine isn't paid, then the child is banned. This is effective, apparently, but punishment seems to hit the wrong spot.

The skills required to manage difficult adults are different from those needed to manage children: some specific help might be useful.

good  
practice

### Images

Guidelines are clearer on the use of images, as is advice on when photography and recording might be permitted, on what it should focus and how it should be used. This is covered in the workshop and in one of the FA's useful child protection and best practice Guidelines: *Use of Images of children/young people under the age of 18*. Issued in 2003 it gives good detail and concludes with 10 Golden Rules

was overwhelming." *Child Protection in Football Research Project 2003*, Celia Brackenridge Ltd, p. 19

<sup>31</sup> This seems to be effective, as reported in the research project, *ibid*, 2002, p. 29.

(see page 40). The IFC found general awareness of the guidelines but little reference to them, however, and some of the “rules” are alarmingly ignored (see page 41). A shorter, updated version of the guidelines and a louder platform for the “rules” would be beneficial. This is something the IFC understands the FA to have in hand.

### *Scouts*

This is an interface spilling over into professional football and is discussed further on page 35. Scouts are beyond the control or influence of the grassroots clubs. The IFC found them perceived almost in equal part as sources of grief and delight. The predatory scout seems to be a familiar figure, particularly on the fringes of the big professional football areas in the north-west, greater London, and the north east north of Darlington. He is warily regarded, as a source of grief, stripping a youth club of its prodigies only to reject and return them later when the club has broken up with the heart of its talent gone. Reassuringly there are less disturbing scenarios whereby a professional club will strike up an almost avuncular relationship with the officers of nearby clubs and discuss with them the pros and cons of giving youngsters a trial at the academy, even waiting on invitations to view the club talent. The IFC found this approach successful and welcome with regard to Middlesbrough FC, for example, and in girls football at Blackpool FC.

good  
☀  
practice

The FL and PL hold registers of scouts, who receive training which the PL and FL monitor. There are ID systems, and club protocols for scouts. But it does not seem often that a grassroots club enquires of a visiting scout if he has signed up to one, still less whether he would please be careful to observe it. The fake scout, sadly, is not unknown. The scout is particularly positioned to approach a youngster and have one-to-one conversations that may well not be supervised, in situations liable to be

misunderstood. This is another area where guidance to youth football seems to be thin: scout, club and child can all be vulnerable.

### *Rules, laws and recourse*

The IFC was surprised how often application of the rules was raised in discussions with clubs and counties. The point made was that the rules of the game are the same for all of football: Chelsea and Manchester United, Teesside Athletic Juniors and Belgrave Bullets – they play to the same rules. The feeling is that the rules are more scrupulously applied under the counties’ jurisdiction, however, where the prevailing ethos is one of education and discipline. Offences such as pushing the referee or spitting will probably result in a fine and suspension in a county. On television at weekends the juniors will see the same behaviour at a professional club not only unpunished but almost the norm. This sits uneasily with the emphasis on values and the use of role models and “ambassadors” from the professional game that are part of the child protection strategy<sup>32</sup>. The subject would be an interesting discussion topic within the child protection training programme, with guests invited to join from the professional game.

Above the rules of football are the laws of the land. On occasion, the IFC encountered some feeling of helplessness at grassroots that football’s rules and structures are simply not enough to combat the spectre and spectrum of child abuse. Local knowledge may mean, for example, that a known offender is in the area and likely to target children’s Sunday football; or abuse of a child may be known but concealed in a refusal to report it. The help available from the NSPCC, the police and social services, amongst

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<sup>32</sup> The IFC was pleased to note that, immediately ahead of the start of the 2005-06 season, the three football authorities issued a joint statement endorsing the professional game’s intention to clamp down on poor player behaviour.



others, is clear in the FA *Child Protection Procedures and Practices Handbook*, and covered in the FA Workshop<sup>33</sup>.

However, the contribution football can make to police intelligence-gathering may merit greater emphasis. Police forces need information on child abuse, for example, regardless of whether a charge is brought or to be brought. Records can be held, with no police action, but used in the case of a further report. Restrictions<sup>34</sup> can be placed on offenders that can prevent them going to public parks or sports grounds for example.

The FA rightly emphasises, above all, that it is inappropriate for a county or club to investigate a suspected case of child abuse: that is the exclusive role and responsibility of trained experts. Forging links with local ACPCs is not always easy, and the bureaucracy around local authority proceedings can also be daunting.

However, most social services departments stress that in any eventuality and ahead of any formal procedures, they are ready to give advice, whether it is about identifying decent, low-cost, child-safe pitches for hire in the area, or checking the appropriateness of some practice inside or outside a club.

The IFC heard some regret that links between these authorities and the whole football network are not stronger. Reiteration of the primacy of these partnerships may be needed more frequently, and through a range of outlets that both inform and update.

## Conclusion

The FA's strategy has, in the last 5 years, driven and facilitated an enormous programme of change and represents remarkable achievement at all levels.

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<sup>33</sup> See *Child Protection and Best Practice Workshop Pack*, section 4.1 p. 58, "The experts".

<sup>34</sup> Under the Sexual Offences Act 2003, see *Guidance to Part 2* of the act, published by the Criminal Justice System, April 2004

Regularly, from organisations outside football and including other sports' governing bodies, the IFC heard unsolicited acknowledgement that football was ahead in many areas of child protection. This was yoked to a sense of awe with respect to the scale of the challenge that football has addressed and the publicity that surrounds most of its actions. Other sports and other FAs borrow child protection measures from English football and have sought the FA's advice, which is readily given. This contributes to a general pattern in sport and one that the FA's strategy has pursued to great effect:

- strong emphasis on education
- trained network of tutors and mentors to deliver it
- CRB checks
- codes of conduct
- designated persons locally
- partnerships: NSPCC, social services, police, CRB
- commitment to the NSPCC standards to drive the programme.

The pace of change has been steady, and often accelerated. Everyone has (just, in some cases) stayed aboard. The FA Child Protection team deserves great credit. Indubitably there have been times when the ride has felt too fast for comfort, especially when, albeit for good reasons, new initiatives have been driven forward in succession.

*The FA has skilled and sensitive staff in its CPU whose greatest success has been in preparing the ground for change and guiding a diverse population across it.*

But in some sectors, the impression is that the pace has not always permitted a thorough preparation of the ground and its bumpiness has resulted in some sense of injury, referees being a case in point. In others some quality (monitoring, quality assurance, clear



and assured information) has had to give way. It is no criticism of the FA to note that some of the targets in its original 5-year plan have been missed: the programme was very ambitious.

**What has, not what has not, been achieved must be recognised.**

The 2005 action plan, *Safeguarding and Protecting Children in Football*, is equally ambitious. Questions of resourcing and support beg to be asked. Is the funding, and with it the staffing, commensurate with the ambition? Is there support at the highest level – the FA's executive and board, leading members of CFA Councils – and is it in evidence? The

IFC, in full recognition of a whole raft of imperatives, believes there is a case for slowing the pace, consolidating and polishing, bedding in existing systems and, through consultation, establishing achievable priorities that are qualitative as well as quantitative, activity-based, and set in achievable timescales. That said, the IFC takes its hat off to the achievements of the counties, clubs and the FA.

## Recommendations

- the FA to consider specific resourcing to enable CFA CPOs to become paid posts
- CPOs and CWOs to be identified on county /club /league literature; the format of job/person specifications should be reviewed
- the FA to work closely with the Football Foundation in its review of child protection criteria for the award of grants
- guidelines on the use of photographic and other images to be updated and reissued
- national strategy for ID cards/ licensing within youth football to be clarified and communicated within an overall review of monitoring
- portability of CRB decisions to be functional on CAS in early 2006
- CRBU to look at information flow when CRB checks fall outside target time-scales, and guidance on expediting processes. FA to consider a general rapid update system out to counties
- roles and processes for re-accreditation of the workshop and CRB re-certification to be clearly communicated by autumn 2005
- wider community advertising of Charter Standard clubs and their benefits
- guidance on handling scouts to be included in training
- slower pace for future roll-out with a limit on new initiatives

## PROFESSIONAL FOOTBALL

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The PL and the FL both accepted the FA's Child Protection Policy issued in 2000 and, with the FA, adherence to the NSPCC's nine standards<sup>35</sup> for child protection established by the CPSU.

Each has reflected this by bringing in rules under their own authority and taking measures specific to the professional football they oversee. Initially, the main emphasis was on child protection at club academies and centres of excellence, the concept of which was introduced in the FA's *Charter for Quality*. However, in recent years attention has been given to child protection beyond the academies and centres of excellence to address the duty of care in the wider club environment, particularly on matchdays. In 2002 the PL introduced a new rule (Section O) specific to child protection<sup>36</sup> to which all its clubs, including those newly promoted from the Championship, must comply. Whilst the underlying principles are the same as the FA's, and cross-reference to the NSPCC's standards, the PL rules are individual to the PL. The FL has no detailed club rules but states in the Youth Development section of its regulations that Child Protection policies, practices and procedures will be applied to all aspects of club activities involving children<sup>37</sup>. The FL's Child Protection Policy<sup>38</sup> replicates the FA's as set out in the 2000 policy document and the FL explicitly states that its "Regulations on child protection are defined in the FA Handbook."<sup>39</sup>

Thus the FA has a dispersed influence on child protection strategies in the game. Its guidance and regulation is total at grassroots; it heavily influences the FL which uses the FA's structures to implement child protection policy at FL clubs; the PL has affinity with FA policy but opts for procedural independence.

In examining how successfully this works, the IFC looked at seven areas:

- compliance and monitoring
- CPOs and COs
- networking and partnerships
- academies and centres of excellence
- wider club activity
- CRB procedures
- professional players.

### Compliance and monitoring

FL rules and regulations on child protection are contained in the sections of the *Handbook*

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<sup>35</sup> See p. 11

<sup>36</sup> Section O sets out the PL's child protection policy and procedures and includes CRB processes, the role of the Children's Officer, obligations of other staff, monitoring and compliance. Source: *The FA Premier League Handbook Season 2004-2005*, pp 99-103

<sup>37</sup> See *The Football League Handbook Season 2004-2005*, regulation 53.5, p. 153

<sup>38</sup> See the Football League's *Youth Development Players' and Parents' Guide 2003-2004*, p. 38 (p. 37 in the 2005-2006 edition).

<sup>39</sup> *ibid.*

on *Youth Development*, which are comprehensive; child protection is handled through the academies and centres of excellence under the umbrella Programme for Excellence. A system of action plans and annual reporting is in place for establishing standards and monitoring application of rules and standards, and checking clubs' compliance. This is overseen by regional managers who visit the clubs to inspect performance and report centrally. Sample reports seen by the IFC include a section on education and welfare, including checks that education, child protection and equity policies are in place and implemented. This is impressive.

The PL described to the IFC similar practice within its Youth Development programme, which is governed by Section N of the PL rules, which require monitoring visits to academies three times a season and bi-seasonal reporting. Section N specifies that the provisions of Section O (child protection) apply to all academies, centres of excellence and development centres. Additionally, the PL also employs external consultants to monitor compliance with Section O rules. The PL gave the IFC a copy of the report for the 2003/04 season, which reported enthusiasm for the monitoring exercise, and compliance throughout the clubs - though "stronger and more comprehensive" at academies than in other club activities<sup>40</sup>. The PL rules on child protection specifically apply to any activity, "activity" being defined as anything arranged "for a Child or Children by or in the name of a Club"<sup>41</sup>. The requirement for all club activities to comply with specific PL rules on child protection enables a holistic approach and progress towards common quality standards. This is less the case with the FL, and the IFC noted that FL club literature refers variously to the FA, the FL and the PL in presenting policy and demonstrating compliance: some examples

are given in Box 7<sup>42</sup>. This may affect standards.

#### *examples of FL clubs' policies and procedures*

- the club's child protection rules and procedures meet the requirements of the Premier League and the FA (no mention of the FL)
- the Centre of Excellence adopts the policy of the Football League on Child Protection
- the FA Premier League Code of Conduct is to be observed when students are taken on tour
- the club adheres to the FA on Child Protection
- all academy staff should read the FA's *Child Protection Procedures and Practices Handbook*.

BOX 7

### **Child Protection Officers and Children's Officers**

The FA itself has a full-time Child Protection Manager. Under the FA's direction, every CFA and every Charter Standard club has a designated CPO/CWO. In line with FA policy, Football League clubs also have a designated CPO. There are some full-time, dedicated incumbents at FL academies and centres of excellence but often CPO duties are part of a post or are part-time. An academy/centre of excellence will often have more than one person handling children's issues, all typically academy-based. There is no member of staff at the FL with specific designated responsibility for children but the Head of Youth Development incorporates this role with regard to the Programme for Excellence.


The Premier League has a full-time Education and Child Protection Manager. PL rules require each club to

<sup>40</sup> Source: *The FA Premier League Season 2003/2004 Section O Rules Child Monitoring Report*, Mereside Associates

<sup>41</sup> Paragraph 3 of Section O in the PL *Handbook*

<sup>42</sup> Examples drawn from 4 clubs – 2 from the Championship and one each from League 1 and League 2 in the 2004-2005 season. None of the sample clubs was recently in the PL.

have a designated Children's Officer (CO): this may be full or part-time. The PL requires a CO for each activity at the club; all Heads of Education and Welfare in club academies are also designated COs, some, as in the FL, designated for the academy only.

**good**  
  
**practice** In July 2005 the PL had 35 COs across its 20 clubs, 18 male and 17 female<sup>43</sup>: a good record and model – especially as in 2003 the

Brackenridge research found only five PL clubs with COs. The IFC believes all clubs – including non-professional clubs – should designate at least two people as CPOs, and preferably one male and one female. This has the obvious advantage of sharing the load and providing cover in the case of absence but, more important, the arrangement gives children an alternative to turn to, besides catering for any situation where a CO/CPO is either accused or offends.

The IFC found no stated qualifications for a CO/CPO. The IFC agrees with the FA's line to CFAs that CPOs don't need child protection experience: experts exist elsewhere. The same approach applies at many FL clubs. At some PL clubs, however, experienced and knowledgeable specialists have been recruited specifically to lead child protection policies at the head of a team of activity-based non-specialist COs who may often add CO duties to existing responsibilities in other areas. The IFC recognises the benefits of having in-house skills on which to draw at a big club and is aware that there are those who strongly advocate that a CO/CPO should be practitioner-based. It is appropriate for football to accept both models, given the enormous range in the volume of people interacting with football clubs and the difference in club resources.

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<sup>43</sup> Source: FA Premier League. The PL was able to give a further breakdown: 2 full-time officers, 28 full-time designated, 5 part-time. The PL also advised that 2 of the COs are from ethnic minorities. The IFC had no statistics from the FL.

The FA and PL issue specifications for a CPO/CO; the former in a document available to the counties and FL<sup>44</sup>; the latter in the PL Child Protection rules<sup>45</sup>. These are broadly similar. Beneath this guidance, a range of job descriptions exist, particular to individual club circumstances.

All three football authorities emphasise education and training in taking forward child protection strategies, and stipulate that designated persons must receive particular training. At all levels, down to and including Charter Standard, they complete the FA's workshop on *Child Protection and Best Practice*. There is thus a commonality of awareness and insight. In professional football, as in the grassroots game, the IFC found endorsement of the workshop and a wide consensus that it is good, appropriate, well-structured, valuable.

The FA provides additional training for CPOs (see page 15). The PL provides its own additional training, based on individual CO development plans. Current intentions are for "differentiated training" geared to individual experience, qualifications, needs, in tandem with a CO portfolio qualification. The PL education programme is impressive.

The IFC notes that the FA workshop is frequently adapted for particular use. The FA appears to be relaxed about this, provided that outcomes are defined, understood and met. Birmingham City's CO is adopting an interesting three-tier system to cover all staff judged to need child protection awareness. This has a handbook and briefings at the minimum level; a club-specific induction course of 1½ hours for the middle; and the workshop plus the club course at the top.

Diversification gives added emphasis to the need for quality assurance and

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<sup>44</sup> Reproduced in the FA *Child Protection and Best Practice Workshop Pack*, p. 60

<sup>45</sup> Paragraph 12 of Section O

maintaining standards: the quality of delivery is important, not least in relation to NSPCC standards. Opportunity for tutors to exchange ideas is essential. The FA is planning to convene tutors in the summer of 2005 for some generic training and specialist work. After something of a gap in such events, this will be welcome. The IFC hopes such meetings will continue regularly, and become a vehicle for generating more sophisticated quality measurement.

The IFC notes that all three football authorities have extended child protection training to headquarters staff. The IFC commends this initiative.

### Networking and partnerships

Within the professional game itself, the IFC found many active networks that facilitate the sharing of good practice and the germination of good ideas. Both the PL and FL hold biannual seminars for specialist staff: COs in the case of the PL; Programme for Excellence staff in the case of the FL. The PL also provides networking and opportunity for clubs to share ideas at its annual Children's Officers' conference, to which former PL clubs with a comprehensive approach to child protection are also invited. The 2004 agenda included a session on extending child protection in the club. The FA's annual child protection conference is open to all. When the authorities work together, the capacity of the game to ensure children's welfare and build employee confidence in its management is strengthened. A further example is the regional networking amongst clubs with an academy or centre of excellence. The FL has developed an annual series for customer relations personnel: including child protection on the agenda would be a good way of giving focus to child-protection in wider club activity in the FL. There is further scope for sharing knowledge and practice: regional meetings for key staff at clubs from Charter Standard

to the premiership, led by all three authorities, might be a possibility.

External partnerships are as important. The PL requires its clubs, under Section O, to have their child protection policies and procedures endorsed by their ACPC. This isn't always easy: the monitoring exercise in 2004 found that linkage with ACPCs is variable although most COs have made efforts to develop them. Some clubs clearly have succeeded and can cite consultation at the front of their policies; the PL told the IFC of one club, Tottenham Hotspur, whose CPO sits on the ACPC. Other clubs, especially where there are specialist COs, take care to clarify to staff how relationships with social services works and particularly caution against any attempts to investigate alleged child abuse without recourse to social services or the police. Uncertainties evidently remain, however, in particular around whether social services or the police can be invoked without the consent of a victim or parents/guardians or other authorities.

The IFC found that clubs are aware of other sources of expertise and experience and turn to them: the local Barnardo's, for example, other sports and leisure activities. Clubs also pay attention to co-operation with local schools, both in managing a child's sporting activity and identifying and addressing abuse situations. EWOs clearly put much time and personal effort into these relationships. The IFC was not able to determine whether the FL or PL obtain feedback from the schools but hopes they do and recognise the value of EWOs' perseverance.

### Academies and Centres of Excellence

The IFC discussed academy/centre of excellence child protection procedures at four clubs it visited and examined



literature from a further five FL clubs, one PL club<sup>46</sup>, and three club websites.

There are around 8,500 young players, aged 9-19, registered at any one time across the 72 FL clubs. PL academies have approximately 2,650 young players 9-19 across its 20 clubs.

Players' welfare is subject to careful guidelines and strict rules. Academies are required to have a Head of Education and Welfare who is a qualified and experienced teacher. An EWO role often incorporates that of a CO/CPO. Responsibilities typically include scholars' education and accommodation, CRB administration, schools liaison, relations with parents/guardians and with host families, involvement in assessment meetings, child protection record-keeping.

Alongside players' physical welfare measures have been adopted to bring about not only recognition of the rights and needs of young players, but also behavioural change in adults. In compliance with NSPCC standard 4, a range of codes are in place to define acceptable standards of behaviour and promote good practice. They typically cover players, coaches, parents, and some others, such as scouts. At governing body level they set a baseline. The PL and FA codes of conduct for coaches/managers provide a good example, both binding under the rules of each organisation<sup>47</sup>. The FA code is widely replicated: in child protection workshop literature, the *Good Practice Guide* for Charter Standard clubs<sup>48</sup> and in CFA handbooks. The two codes have themes in common, illustrated in Box 8, alongside some differences in emphasis reflecting different

readerships, the PL tending towards regulation of the professional game, the FA towards the softer world of amateur football, including encouragement to coaches "to disassociate themselves from a 'win-at-all costs' attitude." The differences perhaps reflect the contrasting nature of the game at the top of the professional leagues and at

*common themes in FA and PL codes of conduct for coaches/managers*

compliance with laws, rules, guidelines  
not using or tolerating bad / discriminatory language  
respect for / co-operation with officials and other specialists  
no conflicts of interest  
high standards of behaviour  
promoting the game

BOX 8

grassroots.

Below these are a whole range of codes of conduct for coaches, individual to clubs. Some good examples of their content are given in Box 9. It is clear that much thought goes into these codes and that they are sensitive to the coach-young player relationship. Unlike those of the football authorities, the IFC found no mention of sanctions; a code carries less weight without them. How adherence to the code is monitored is not entirely clear. The Programme for Excellence relies on what the regional managers observe, and feedback from parents and children, contained in the club Annual Report. Seeking the child's view is an attractive idea (though, for protection of their own interests, children may use varying levels of veracity) as is the reported practice in some clubs of involving young players in the development of the codes of conduct

<sup>46</sup> The IFC found academy literature more difficult to obtain from PL clubs, only one (of 10 approached) agreeing to supply its brochure on telephoned request.

<sup>47</sup> See *The FA Handbook Season 2004-2005*, p. 417; *The FA Premier League Handbook Season 2004-2005*, pp 260-1

<sup>48</sup> *The FA Football Development Programme Charter Standard Clubs Good Practice Guide* p. 8 (including clause 12). It is also in *The Football Association Football Administration Handbook* for those new to coaching and included in the *Charter Standard Clubs Club Development Manual* (p. 40).

*examples of club codes of conduct for coaches*

- 9 principles for academy and FITC coaches e.g. "respect the rights, dignity and worth of each player ... encourage and guide players to accept responsibilities" (Manchester United)
- in 3 parts (i) setting an example e.g. arriving 20 minutes before the session is due to begin, (ii) coach's responsibilities e.g. contact players if a match is cancelled or changed (iii) further reference e.g. the coaches' charter produced by the national Coaches Foundation (Queens Park Rangers)
- focus on desired behaviour towards young players e.g. "No bullying of players ... Do not instruct players on their next pass... At full time, however desperate the situation, look for something positive ... " (Reading)
- 7 simple bullet points expecting coaches to act as role models, seek ways to improve players' development and finally to be "gracious in defeat and dignified in victory" (Oxford United)
- advice e.g. "Be constructive and positive with the children ... Teach our players how to win and lose games in the right manner" interspersed with required practice e.g. "... changing rooms must be left clean and tidy ... " (Blackpool girls team)

BOX 9

themselves<sup>49</sup>. The PL relies on observation during monitoring.

Codes of conduct are widely recommended<sup>50</sup> and football has done well to bring them in and to do so creatively. It would be interesting to know the impact and effectiveness of club codes on those they address: how familiar they are with them; what imperative they feel to observe them. Some objective measure of the codes' effectiveness would surely be useful, especially in relation to scouts, for example, whose conduct on professional duty will not immediately be observable by the club.

<sup>49</sup> See *Children in Football: Seen But Not Heard*, Pitchford, Brackenridge et al in *Soccer and Society* vol 5, no. 1, spring 2004, p. 55 – drawing on the Brackenridge research commissioned by the FA.

<sup>50</sup> E.g. *Working Together to Safeguard Children*, Dept of Health, Home Office, Dept for Education and Employment, 1999, paragraph 3.17. *Protecting Children, a guide for sportspeople*, published jointly by sports coach UK and the NSPCC, 2005, contains key principles for a code of practice for sports coaches. In other sports, the AAA and RFL, for example, have a coaches' code of conduct broadly similar to the FA's.

Preventative measures (NSPCC standard 3) are handled differently. Bullying, for example, is covered by specific anti-bullying policies addressed to parents, coaches and others. The IFC found anti-bullying policies regularly in place. They vary in style and content, but have the common aim of preventing bad practice. How successfully is impossible to say. There is a school of thought that positions football in a man's world where children have to learn to stand up for themselves, be resilient, and take some "bollicking" and all that goes with it. On the other hand, anecdotal feedback from the FA workshops suggests that training can provide an eye-opener, especially where bullying has been inadvertent, the result of football traditions that put down the under-achiever. Bullying, its forms and consequences, were reported in the first report of the *Child Protection in Football Research Project* in 2002; it would be interesting to know what use the FA has made of the data and whether it has been used to map progress in the four years since the data was collected. The IFC notes the PL is considering commissioning research into bullying.

It would seem that bullying remains prevalent in sport<sup>51</sup>. The Brackenridge report found bullying second (marginally) only to physical abuse in case referrals in football; the NSPCC reported at the FA's Child Protection conference in November 2004 that 31% of children experience bullying during childhood.

*Stating the unacceptability of bullying in football and providing a framework for it to be recognised, reported and dealt with indicates football's determination not to tolerate it.*

<sup>51</sup> Not only football. In 2002, the ASA examined 78 cases of abuse 1997-2001. Sexual abuse accounted for 63%. A further analysis in 2003-2004 found bullying to have increased to 34%, overtaking sexual abuse and prompting the ASA to introduce an anti-bullying policy.



Other areas too are covered by child protection policies and guidelines at academies and centres of excellence. Some are subject to a wide range of controls and precautions. Tournaments and overseas tours are particularly complex and difficult to protect absolutely: the FL's procedures revised for the 2005/06 season run to nearly 50 pages; 28 pages in the PL 2004-05 *Handbook* are devoted to tours, festivals, tournaments and visits; the FA provides full guidance for grassroots. Topics of some other policies and guidelines are illustrated in Box 10. The range of guidance, rules, policies is impressively thorough. The IFC noted however that, especially to smaller clubs, it can be overwhelming, especially when hearsay is added in and suggestions from outside football (social services, for example). As one club said,

*It would be nice if the FA could collate some of the information and get one standard document ... there should be a standardised something, - something clubs can follow and know that they are doing the right thing.*

Simplification can be very effective.

Doncaster Rover's one-page of simple do's and don'ts in child protection, for example; Reading's attractive and readable academy brochure with it all (or a lot of it) in around 40 pages; the FA's credit card sized card (Beckham on the front) giving four key child protection sources of help.

good  
☀  
practice

The three authorities might consider collaborating to produce a succinct summary of core essential "policies" common to all football, and desirables according to size or league status. This could also carry suggestions where good practice can be found at clubs willing to help. The IFC was quite often asked questions about other clubs' practice on practical points that policies don't lay down. Do academies ban bladed boots? Is it permitted to let U/11's shower? What do big clubs do if it's the boss who fails to collect his kid from training? There is

always a club that has thought about this somewhere.

*A few hub clubs, rich in experience and with known good practice at their academies, willing to be a telephone or e-mail source of advice and reference, would be a welcome innovation, a source of real reassurance.*

There are three further areas that came to the IFC's attention whilst looking at academies and centres of excellence. Two are CRB-checking and policies on images: these are discussed on pages 40-44. The other is release strategies.

The vast majority of young boys who get a place at a football academy or centre of excellence, whether as student/scholar, triallist or trainee, are either rejected or drop out. The failure rate is vast, can hit a child's self-esteem hard and will probably generate a sequence of negative effects: taking the failure back to the child's previous club; not getting his place back in the team there; alienation because old friends have found new

friends, and so on. The IFC found awareness of the problems; sensitivity varies.

The FL and PL have similar rules governing termination<sup>52</sup>.

Actual criteria are left to the clubs.

Some clubs simply echo the rules in their printed material, limiting information to the process.

Others go to considerable trouble to explain the practicalities: how

*some policy and guideline topics*

transport and travel  
education  
missing persons  
staff recruitment and induction  
residential courses  
the employment of young people for promotional purposes  
conduct and standards  
photography  
pick-up procedures  
release arrangements  
liaison with schools

BOX 10

<sup>52</sup> Quoted in the FL's *Player and Parents Guide*, p. 27, and PL rule N 65 - 69

meetings will be conducted and how parents will be involved. Reading provides a good example in its academy brochure, using sympathetic language to explain in summary

good  
practice

how the process will be conducted, encouraging players to treat their time at the academy "as an enjoyable experience for however long it lasts<sup>53</sup>."

Some clubs pin notices to a board, arguing that the boys like to find out in their own way and time. Some meet the parents but not the child, delegating the breaking of the news. Some child protection literature wraps the rules in wider explanation of how they will operate. Some ensure that at least two members of staff will be at release meetings, including the EWO, likely to be trained in handling sensitive issues. There is clearly no easy way.

The IFC was struck, however, by how little information seems to be given about the actual decision-making process. Clubs provide regular systemised assessments, which are inspected, and for which there are report forms shared with the player. Clubs will generally include some briefing on technical assessment at induction. But the link between these actions and the final decision; and whether, over the period of a scholarship or trial, the player and family are reminded of such a link, is not clear. The IFC found one club, Oxford United,

good  
practice

providing this clearly in its printed information, along with the assessment criteria in FL club use and the grading system that will be applied<sup>54</sup>. It may be that other clubs inform their academy students in documentation outside that pertaining to child protection; that FL and PL monitoring may include dialogue about assessment criteria directly with the child; or that coaches brief the students verbally on how a decision on their future will be reached. The IFC did not hear of these practices. The pressure on players is

enormous, especially as they approach 16 and exit from a protected playing environment. As one manager, quoted in a club's academy literature has said:

*When I started out you had to aim to be the best in Britain in order to make it; now you have to be the best in the world.*<sup>55</sup>

De-registration is perhaps the most damaging blow young footballers get. Communication about how the assessments inform the ultimate decision is surely owed each child. The IFC was disconcerted at one club to be told that release decisions are down to the coaches "because they just know". At bottom this is an area where football fails children because of the numbers taken into the academies, in full recognition that hardly any of them will be retained. It seems cruel.

### Wider club activity

Professional football's initial focus on child protection in youth development is understandable. That is where the children are. However, children need to be protected at football clubs, whether they are scholars, spectators, ball boys, mascots, junior club members, shop customers, participants in FITC activities, learning centre pupils, sponsors' guests, stadium tourists ..... The PL's decision to recognise and direct this has not been followed by the FL, although a new strategy under development with the FA may do so. The IFC believes FL clubs would welcome a wider focus from the FL and that this would benefit clubs and **help raise club welfare practices to the high standards found in the FL's Programme for Excellence, which has made exceptional progress, in a short time, and from a low base.**

With the introduction of Section O, PL clubs were faced with unexpected

<sup>53</sup> Reading FC Youth Academy 2003/4: *Creating Excellence*, p. 41

<sup>54</sup> Oxford United Football Club Centre of Excellence and Youth Development pp 15 – 22.

<sup>55</sup> Gordon Strachan, quoted on Southampton FC's Saints Academy site on [www.saintsfc.co.uk](http://www.saintsfc.co.uk)

challenges and often a major review of practices. One club explained to the IFC that one of the first exercises it felt should be undertaken was to establish how many under-18s the club had close contact with: no one knew. But evidence suggests that, to quote the independent consultants' report on PL clubs in 2004,

*Premier League Clubs have made a sound start in establishing effective and appropriate Child Protection arrangements for children who participate in their Activities.*

The PL and its clubs have developed a professional approach. The PL's own assessment is that the policies are working well. It has concerns about the FL's distance from child protection issues outside the Programme for Excellence, citing promoted clubs' struggles to comply with Section O, despite often dedicated help supplied through the PL. They may also lose incentive if, as their first season in the PL progresses, it looks likely that they will be relegated at the end of it. Some relegated clubs try to maintain PL practices but the PL observes that (re)promoted clubs have difficulties meeting Rule O. That said, there is a great deal of excellent club practice in the FL. One of the most forward-looking approaches to child protection is at Norwich City, initiated when it was in the Championship and being taken forward in the Championship, after one season in the PL. But overall, strategies to address the potential risks to children on matchdays are, in the IFC's experience, patchy in the FL.

The IFC took interest in three particular aspects of club operations on matchdays, in all four professional leagues: ball boys/girls and mascots; stewards; photography.

#### *Ball boys and girls and mascots*

The IFC found very varying practice with regard to ball boys/girls. Responsibility for them at matches and guidance on their role sometimes but not always rests with FITC staff, who will be used to working with children, have been CRB-checked and will have done the FA workshop. This is

appropriate and it is reasonable to expect that attention will be given to ensuring ball boys have appropriate changing facilities segregated from adults and, if there are ball boys and girls (and mascots), separate from each other. However, a diverse range of club arrangements for ball boys means there is no generally accepted best practice. And there are issues. The IFC came across instances where ball boys/girls have been the target of abuse from players and sometimes coaches. This may be when the child is not aware of conventions, particularly towards the end of professional games, regarding how quickly or slowly a ball is thrown back into play. There is at least one instance of a player angrily throwing the ball back at a ball boy, causing injury; and several of unacceptable language being directed at ball boys. The IFC did not find COs and CPOs very alert to systems for protecting ball boys and girls; there was greater awareness amongst EWOs/ Heads of Welfare.

The IFC found similar uncertainty about child mascots. Again some clubs take care that they have their own area prior to the match, and that someone at the club takes responsibility for them and for escorting them to the point where they will be led on to the pitch, and receiving them back once the game starts. That there is a point of responsibility is obviously important. In several cases the IFC found that mascots were the responsibility of the Marketing Department who may not be CRB-checked or have staff trained in child protection. If the CO/CPO is in a position to provide overall supervision this may not matter. On the other hand, the policy of Manchester United, for example, that all staff looking after matchday child mascots must be CRB-checked and accompanied by a parent/carer, is sensible, as is the PL idea of trained "family co-ordinators". Clear

guidelines on ball boys/girls and mascots should be in place at all clubs.

There are also issues around the other mascots, the adult ones inside funny costumes who entertain the crowd and frequently have an extended role at the club, usually interfacing with children. The IFC did find that some club mascots are CRB-checked but found, in its fairly limited but representative sample, limited instances of guidance or training. This should be given attention. Those acting as club mascots are vulnerable to their actions being misinterpreted, especially when they are posing for photographs with children or when asked – often by parents – to hold children or take them on their knee.

### *Stewards*

The IFC found a range of child protection measures applying to stewards, with greater attention paid to the risks at the larger clubs. At most of the clubs the IFC visited there was uncertainty about what training is given to stewards with regard to child protection, and uncertainty whether they are, or should be, CRB-checked. The IFC found varying planned or existing practice with regard to child protection measures for stewards: some examples are given in Box 11.

#### *child protection measures for stewards*

- CRB checks for stewards with contact with U/18s and/or
- workshop training for stewards with contact with U/18s
- CRB checks for all club-employed stewards
- matchday briefing and/or other briefing for senior stewards / stewards' supervisor
- CO / CPO attendance or participation in stewards' briefing
- inclusion of child protection in guidelines for stewards
- club child protection procedures issued to all club-employed stewards
- CRB and workshop for the Safety Officer
- no CRB checks for stewards but alternative vetting e.g. by a security officer
- limited steward training other than the workshop
- some guidance in stewards' handbook

#### **BOX 11**

The stewarding issue is serious at the larger clubs. The numbers involved can be significant, with between 600 and 800 stewards employed on a matchday at a PL club, some of whom may be casual labour. Clubs appropriately focus on areas where children obviously congregate – family stand, junior supporters' area etc. But the stewards' role extends to children throughout the ground including search procedures on entry (which might include frisking); lost children (who may get lost anywhere); ball boys (who are often told a steward is their point of reference during the match if necessary); evacuation procedures (in which event there will be large numbers of unaccompanied U/18s to care for).

The IFC found some clubs addressing the problems actively. Birmingham City, for example, has a range of good practices in place regarding stewarding. It has a good missing children report form for stewards<sup>56</sup>; guidance to stewards on away game coaches; and has a policy on frisking and accordingly amended ground regulations.

good  
practice

The football authorities have also to take into account legislation designed to prevent unsuitable people from working in the security sector. This requires certain categories of security personnel, which may include some stewards at football grounds, to be licensed. Discussions were on-going in mid-2005 between the Security Industry Authority (SIA), responsible for implementing the legislation, and the football authorities and the Football Licensing Authority (FLA). The legislation allows for exemption, provided certain conditions are met, including CRB-checking and specific training: the latter has been developed by the FL and the FLA. The

<sup>56</sup> It is equally important to have a missing person procedure for academy children and the IFC found these in place – but not always with a matchday equivalent



current (July 2005) CRB position is that clubs can only check their stewards if they are satisfied they meet the criteria e.g. child or vulnerable adult protection. Whatever the decision on exemption, the IFC suggests there should be clarification for all clubs about avoiding CRB "creep" (see page 40), and what is an identifiable child or vulnerable adult protection role for a steward. This may go beyond the family stand and junior areas and may need to take into account other areas, e.g. youth groups in the open stands and evacuation procedures.

### *Photographic images*

Football has tried to take a firm grip on photography and other recorded images of child footballers. There is a recognised risk, and a body of evidence, that published photographs of children can identify them and, especially if the images find their way on to the internet, can render a child vulnerable. Photographs and videos can also be edited for inappropriate use. Many sports recognised these hazards some years ago and acted to guard against them<sup>57</sup>. The CPSU issued advice to all sporting organisations in relation to photographs and images of children in 2002. In 2003 the FA issued its *Use of images of children/young people under the age of 18*, containing the "ten golden rules to remember" (reproduced in Box 12). The topic and the "ten golden rules" are also part of the FA *Child Protection and Best Practice* workshop, and are included in the workshop pack..

The IFC found general awareness of the issues. Some academies and centres of excellence have comprehensive guidance, often based on the FA's. In some cases the "ten golden rules" are reproduced and the FA general guidelines seem to be used for academy/centre of excellence matches. Several clubs showed the IFC parental permission forms they use, some of which

include a section for the child's consent too. The rules on photography at academies vary, from a complete ban to no photography at all except for that officially contracted by the club. It is not always clear that parents (and children) are told why photography is banned or that they or staff understand all the implications. The IFC found only limited recognition of the extended risks to children e.g. parents editing videos of their child for home coaching or even to "sell" edited highlights of the child's performance to other clubs. The IFC

### *TEN GOLDEN RULES TO REMEMBER*

1. All children must be appropriately dressed
2. Photography or recording should focus on the activity not on a particular young person
3. Images should focus on small groups rather than individuals
4. Images of a child who is under a court order should never be used
5. If a young person is named avoid using their photograph
6. If a photograph is used avoid naming the person or use their first name only. Personal details should never be revealed
7. Make sure parents/carers/young person have signed and returned the Parent/Carer and Young Person Permission Form
8. Use photographs that represent the broad range of youngsters participating in football
9. All people taking photographs or recording footage at a football event should register with the event organiser
10. All concerns regarding inappropriate or intrusive photography should be reported to the appropriate organisation.

BOX 12

was pleased to find some academies (and counties) in touch with the Internet Watch Foundation<sup>58</sup> which works to minimise the availability of on-line illegal content, particularly child images. In general the academy / centre of excellence lends itself to close control

<sup>57</sup> The ASA published guidelines in 1999, for example, which have been used by other sports, including athletics.

<sup>58</sup> Information available on [www.iwf.org.uk](http://www.iwf.org.uk)

and by and large it seems likely that appropriate measures are in place.

Outside the academies the IFC found lower awareness and looser control. The issue is immediately much more complicated. Grassroots clubs find it virtually impossible to control photography. Games are often played on multiple pitches in a public park over which the clubs have no rights. Deciding whether an individual is from the local press or a player's relative or a potential paedophile is impossible. The IFC acknowledges the general difficulties.

Key people at Charter Standard clubs will, having attended the FA workshop, be aware of the risks and the need for a policy but the majority of clubs are pretty helpless to implement one effectively. Creditable effort is made, but controlling photography continues to be a grey area.

At professional clubs the IFC found awareness of the issues but uneven attention given to the risks. The PL and FL leave management of the issue to individual clubs. An area of concern brought to the IFC's attention is the use of photographs in matchday programmes. This is widespread and popular with children, their families and friends. But the IFC found in a survey of 24 matchday programmes randomly taken across all the leagues<sup>59</sup>, that FA "golden rules" 5 and 6 are regularly breached and that clubs do not recognise the risk to children if they are traceable to their school or home from an image in a programme. Photographs most commonly used are those of mascots, but pictures of ball boys and girls are also used. Children also feature on "news" pages (e.g. birthday notices) and where children have won prizes in club competitions. The findings from the survey are shown in Box 13. In all but two photographs, children are fully identified. The IFC understands that the FA is working

on revised guidelines and hopes these will be in a simple and accessible format and will be widely promoted. The IFC suggests they should include suitable cautions about mobile phone photography: the technology seems to postdate the guidance issued so far. It would, furthermore, be appropriate for the PL and FL to address images issues with their clubs ; clearly it is not only in matchday programmes where the misuse of child images can occur.

#### *photos of children in matchday programmes*

number of programmes	:	24
number of photographs	:	95
forename only	:	2
forrename and town	:	2
full name	:	35
full name and town	:	7
full name, town and personal information	:	2
full name and school	:	23
full name, town and school	:	4
full name and address	:	2
full name, town, school and personal information	:	16
full name, full address, school, personal information:	:	2

**BOX 13**

### **CRB checks and referrals**

There is extensive CRB checking in the professional game. Their use and usefulness seem to be generally accepted. In the academies and centres of excellence it seems clear who must be CRB-checked: all those registered as working with children and young people, and some others such as host families. Members of the FA Coaches Association (FACA) and referees are checked, also FITC staff. Beyond them there is a varying pattern of checking. Some of the bigger clubs extend CRB checking to all

<sup>59</sup> 5 from Premiership games, 5 from Championship/Div 1 games, 4 from Division 2/League 1 games; 8 from Division 3/League 2 games. Period covered: season 2001/02 - season 2004/05



club-employed personnel likely to be in contact with children. This might include shop staff, the Safety Officer, some stewards, volunteers in the crèche, receptionists, scouts, agents etc. Learning Centre staff are expected to have been checked through Local Education Authority procedures. Where cleaning or catering is franchised, some clubs formally expect the franchise company to be responsible for vetting<sup>60</sup>. Professional clubs are taking precautions and trying to take practical steps appropriate to the perceived risks to young people.

A number of issues arise. The Police Act and related legislation<sup>61</sup> controls who is eligible to be asked for a CRB check and in what circumstances. The football authorities and football clubs cannot necessarily decide. The situation in 2005 has been fluid. Findings of the Bichard enquiry has led to government examining which categories can be eligible for CRB checks; existing ones may, in due course, be extended. The FA has contributed to this enquiry and has a close working relationship with the CRB.

In these circumstances, and taking into account the newness of CRB-checks<sup>62</sup>, hard and fast rules about CRB-checking are difficult for football to lay down. Caution must be exercised. It is important that the PL and FL are mindful of this in respect of individual club's policies. The IFC found grey areas where clubs are uncertain about the need for CRB checks; a finding

reflected in the 2003/04 monitoring report on PL clubs.

The authorities should check that at county and club level, opportunities and information exist to ensure individuals are aware of their rights<sup>63</sup>. The instinct to check everyone's criminal record just to be on the safe side is understandable, but unacceptable CRB "creep". Such action is likely to infringe people's rights, also covered by legislation.

CRB-checking, after all, is not about protecting football but about protecting children.

The CRB process has yet to bed down in football. What is in place is admirable. The speed and efficiency with which structures for a vast and complicated process, new to football, have been put in place is deeply impressive. But there are some areas that cause concern. The IFC is aware that most, if not all of these are under attention by the FA, the CRBU or the PL – or all three.

The first is the fact that two different systems operate within football. The PL has its own good reasons for insisting that its clubs register independently with the CRB and are in control of data pertaining to individuals in, or wishing to be in their employ. The separation of functions between the FA and PL may not necessarily be in the best interests of children, however. It is possible for someone to be rejected for work with children in football by the FA, but accepted by a PL club, for example. It may also be that, when a disclosure on an individual is received from the CRB, different thresholds of acceptability for work in youth football apply within the

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<sup>60</sup> Catering is a potentially difficult area for football clubs. Franchising is common and many staff are casual and very temporary labour. It is not unusual for waiting staff to be female and under 18 and to be vulnerable in some hospitality areas to more attention than might be appropriate, albeit good-natured. Preventative measures are not straightforward. But clubs are vulnerable to adverse publicity and assumptions that they carry responsibility.

<sup>61</sup> E.g. as well as the Police Act 1997, part V: the Rehabilitation of Offenders Act 1974; Criminal Justice and Court Services Act 2000, Care Standards Act 2000; also Human Rights legislation.

<sup>62</sup> The CRB itself was established only in 2002

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<sup>63</sup> Anyone concerned about the need for a CRB-check has the right to an explanation from the requesting organisation – ultimately, in football, the FA or PL. If dissatisfied they may ask the CRB direct. Adherence to the CRB code of practice should not be regarded as tacitly providing this right.

FA and PL systems. The IFC has no way of knowing whether this is the case but the risk is there. It is also possible that an individual rejected for work with children might be in a position to compare the processes used and challenge the decision.

Following on from this are the two separate systems for examining reported allegations or cases of child abuse referred by counties and clubs. Case management for the FL and counties is handled by dedicated, qualified personnel in the FA's Compliance Unit. There is a full referral form used by the counties and all FL clubs. In the event of a child abuse allegation or incident in the PL, clubs are asked to use a summary form to notify the PL and the Child Protection Manager at the FA of referral to the police or social services<sup>64</sup>. The FA in 2005 had around 250 cases on-going. The PL told the IFC that it had had four cases since 2003, which it commissioned an independent company to investigate. All were resolved; a further two were ongoing (July 2005). The numbers of referrals relative to the number of clubs and their populations are not high. But, as a system for protecting children, the bi-model is flawed. Shared processes and a predominant will to protect all children in all parts of the game would carry a stronger public message about child protection.

Children stand to be better protected if there is uniform case-handling and, more important, confidence that, whichever body is deciding who is appropriate to work in football, the response to an individual would be the same.

A third issue is the sharing of data. There are two aspects to this. The first is the legal impediment, under CRB legislation, to sharing information about an individual. Football is permitted to seek enhanced disclosures<sup>65</sup> from the CRB i.e. information

beyond that of recorded convictions but the law does not permit the information to be shared, only the decision that took it into account. The law permits CRB checks to be handled through an umbrella organisation, which is what the FA has done with the Media Group. This arrangement permits decisions – not information – to be shared with others under the umbrella: appropriate personnel at FL clubs and counties – but not at PL clubs which equally cannot share decisions with the FA. Whilst a PL club's decision to refuse employment might be picked up in a subsequent CRB process at a FL club, there is no guarantee. While this general unco-ordinated situation obtains, the protection football offers children is imperfect. Portability i.e. data-sharing must be a target, within football and between football and other sports. The FA has been exploring this through a pilot scheme in Birmingham, in conjunction with the City Council. There are also on-going discussions between the PL and the FA about working together. The IFC hopes these will be fruitful.

A further, related aspect is multiple checking. This is a great source of grief and was raised again and again with the IFC. A CRB check can be required of an individual several times over. Someone working for the local scouts, driving a bus for the youth rugby team, working part-time as a coach at their child's amateur football club and holding a full-time job as a teacher is likely to need four separate checks – because data cannot be shared. The FA, for the same reasons, does not accept CRB check certificates

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<sup>64</sup> Form 38, contained in the PL Handbook. The FA told the IFC it had received no PL referral forms.

<sup>65</sup> This is well-explained in the *Child Protection and Best Practice Workshop Pack*, p. 17: "A CRB Enhanced Disclosure (discloses) a person's recorded convictions

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and also ... other concerns such as ongoing prosecutions. It may also pass on information regarding children on the child protection register or ... that a person is not a suitable person to work with children (or) ... that further investigations are required, for example if the person has a history of drug dealing or violence."

from any other source but the CRBU – because it would not have the enhanced disclosure. This policy too can mean multiple checking – some of it within football. The FA (and by extension the FL) and the PL will not accept each other's CRB checks. Football can even require three checks from one individual: a PL club, the FA /FL, and separately within the FA to travel abroad as an official supporter of the England team. The latter does not involve a CRB check but it does require a PNC check and to the individual the distinction is slight. Moreover, the same individual could get three different decisions. Some unrest amongst those on the receiving end is understandable, as are calls on the CRB to introduce some kind of national or core check<sup>66</sup>. Football is not in a position to sort out the national position though it may contribute views. Reconciling the position inside football is within its power. Some decisions will be necessary at the PL if CRB consultations on raising the threshold on the size of organisations permitted to register independently with the CRB become law in 2006. The PL tells the IFC that its clubs are concerned that deregistration would be a retrograde step, reducing efficiency.

Developing, with the FA, a unified system for football would be an option that the IFC hopes will be considered, and the benefits to children in football permitted to weigh heavily in the balance.

### Professional players

Professional players featured little in the IFC's meetings and discussions, or in documentation it received on child protection in football. Codes of conduct for players are codes for young amateur players. In discussing child protection measures, professional clubs stopped short of the players whose contracts, as one put it, are "out of reach". Even shortened,

adapted versions of child protection training do not seem to extend to the players, reasons given ranging from "they wouldn't do it" through to "they don't have anything to do with children".

There are cases of child abuse amongst sportspeople in many sports, including the elite sectors. These include child abuse involving professional football players, one at least as recently as 2004, which was the subject of considerable publicity. Safeguarding children rightly drives the agenda but also of importance is making it difficult for situations to arise that might get out of hand – "horseplay" with youngsters, for example – and also protecting athletes and players, by raising their awareness.

Far from having nothing to do with children, professional players are frequently not only asked but required to interact with children. Some examples are given in Box 14.

Players are not CRB-checked and it is doubtful that they should be in their capacity as players. They are not – with a few exceptions - offered child protection training. The Professional Footballers Association (PFA) has nothing specific in place for players in this respect, except for those who may be interested in moving into coaching or management and may take the level 1 coaching course, which includes a child protection element. But this is only brief and less likely to capture the younger players. A consideration to take into account is the growing number of foreign players in the professional game, some with little knowledge of English, some from cultures with different recognition of children's rights.

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<sup>66</sup> The sports sector is to looking into forming one CRB channel so that inappropriate individuals can be tracked across the sector

*players' contact with children*

- player visits to club Learning Centres, where they are encouraged to interact with the children
- leading mascots out on to the pitch: always children, sometimes with disabilities, always involving a photograph
- community visits to schools in connection with FITC or to promote the club
- training and/or changing facilities in close / adjacent proximity to academy juniors
- hospital visits on behalf of charities, very often to children's wards
- teenage girls wanting body autographs
- photo calls for national campaigns, often featuring children

BOX 14

good  
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practice

A very few clubs are becoming alert to the precautions that can be taken. Norwich City took a decision, at CEO level in the 2003/04 season, to put its first team players, manager and physios through child protection training. 31 attended the full *Child Protection and Best Practice Workshop*. Their feedback was very positive. Contrary to assumptions, the squad did not find the three-hour session too long. It was led by the County CPO and the PFA: the players and manager commented that it was professionally run, well-delivered, interactive and interesting. The style of "guiding not telling" was appreciated. The benefits identified were similar to those from other sectors: raising awareness; discovering the relevance of issues not previously recognised as relevant to themselves; recognising appropriate behaviours and precautions for themselves in particular situations; knowing what they should be doing when with children. The Norwich team understood the resistance other clubs might feel and had suggestions: a shorter version "a little eye-opener" each year for new players; starting with the young players, and including the 17-year old scholars, for example, so that players understand the issues from the start. Scholars – and scouts – at the club do the workshop and the entire child protection

programme is firmly backed by the CEO. The club shows a commitment and seriousness in several other ways: a FITC initiative with Ipswich Town FC, for example where players from both clubs combined to promote the *Child Protection Guide* in a project to help socially excluded children; backing *A Solid Defence*, a campaign in Norfolk to alert events organisers to the risks of their occasions being used to gain illegitimate access to children. Norwich sets a good example which, it is hoped, will interest other professional clubs. The IFC was told by the PL that at least one other PL club has now offered child protection awareness training to its players: the signs are good.

There are other clubs alert to the vulnerability of players and taking precautions. In the case of schools visits, for example, some clubs will advise the school in advance, particularly if the players are to be invited to do any coaching, that they are not CRB-checked. FITC staff will often accompany schools visits. Others go further. At Blackpool the Head of PR accompanies players on all community visits. It can be a thankless task. A club official may step in to stop a player posing for a photograph with a 12-year-old girl on his knee, or may intervene if a player is asked to sit on the bed of a sick child in hospital – but refusal may prompt disparaging remarks about highly-paid players being too big-time to care. It's not easy. Some PL clubs have the intention of CRB-checking their professional players (though this should be done with caution (see page 42). Manchester United has required the first team manager to have a CRB check and the annual child protection report is copied to him. The League Managers Association, incidentally, is a strong supporter of the child protection strategy.

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With the occasional exception such as Norwich, there appears to be few if any guidelines or policies in child protection awareness for players, from any of the football authorities, or the PFA. The IFC feels the authorities should look at this, in conjunction with the PFA, in the interests of professional players and the children they try to help.

There is a duty of care both ways.

## Conclusion

All three football authorities have achieved a tremendous amount in the last four or five years. Professional clubs are evidently alert and sensitive to child protection needs. The CO/CPO structure is in place and established. Child protection has been incorporated into the rules and regulations governing professional clubs. Care is taken to make public professional football's concern for young players, through academy/centre of excellence literature, through club practice, and through the behaviour of trained staff.

Differing policies, procedures, rules, standards do, however, inhibit widespread sharing of good practice and a common stand for the professional game on safeguarding children. This is a major concern.

Diversification and a mixture of over-cautiousness and enthusiasm can make child protection over-complicated and sometimes excessive. Common sense, communication, and clear, simple procedures need to be kept to the forefront. At a more fundamental level, standard terminology and, between the PL and FL, a basic scheme of standard club practices would make it easier for staff to share and develop experience and understanding. That there can be at least seven different acronyms<sup>67</sup> for the designated person in the various

environments of the game, and that these have to be explained to mixed audiences, perhaps encapsulates that, on occasions, the fundamental aim of protecting children can get a bit lost amongst rival procedural interests.

## Recommendations

- the FL to issue central guidance and direction on general club activity and clarify which policies and procedures its clubs must follow, and monitor compliance
- PL and FL monitoring to include quality and measures of effectiveness, as well as adherence to rules
- at least 2 staff with responsibility for child protection at all clubs, one male, one female
- PL and FL to review communication to parents and children concerning the decision-making processes around release/retention at academies, and assess and assure transparency and understanding
- minimum standards for the care and safety of ball boys/girls and child mascots, to include a requirement for guidance or training for those with direct responsibilities
- clear instructions from the centre on appropriate child protection measures in stewarding, geared towards achieving consistent practice and the understanding of all security personnel
- updated policy on the use of photos and recorded images of children to apply to all levels of the game
- shared practice and closer liaison between the FA and PL on CRB checks, referrals and case management, with specific attention to portability
- the football authorities to monitor and actively deter CRB "creep"
- FL and PL in collaboration with the PFA and the FA to introduce basic child protection guidance and training for professional players

<sup>67</sup> CWO at grassroots clubs, YLWO in youth/mini soccer/girls leagues; CFA CPO at a CFA; EWO in the FL Programme for Excellence; Head of Education and Welfare at a PL academy; FL CPO at a FL club; CO at a PL club

## GIRLS IN FOOTBALL

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Football is perceived essentially as a male game. There is no professional football for women in England, so career prospects for girls are limited, even those who have attended a school for excellence. The number of female physiotherapists is growing however and they are entering the men's game. The number of female coaches and referees are also increasing though no one the IFC met could think of a female coach in professional football, and there seems to be few A-licensed; female referees at the top of the game are rare. Male-dominated football is wary of girls. The Brackenridge research found, in 2002, "that boys in football were seen as far safer than their female counterparts."<sup>68</sup>

Girls football, however, is said to be the fastest growing sport in England and the favourite sport for women: 41,000 U/14s were playing the game in 2001-02<sup>69</sup>. This is reflected at grassroots where girls and boys teams are common, as is mixed football for younger children. Even so, the specific needs of female children and adolescents are given little attention; club child protection policies are usually applied to both genders which, on the face of it, is reasonable but perhaps short-sighted.

The positive side of all this, however, is that the growth and popularity of girls football is itself becoming a dynamic in child protection, prompting new thinking about behaviours such as which adults might go into changing rooms, where body-handling should stop in coaching practices.

The IFC found little sensitivity to girls' needs at clubs offering girls football and, in some cases, something approaching uninterest. Professional clubs will often regard girls football as the responsibility of FITC – appropriately enough in practical terms as FITC staff are trained in child protection and used to working with mixed gender groups in school and community work. The girls/women's teams at professional clubs, if they have them, will often be excluded from the club's ground and main facilities though they will play at the training ground or use academy or youth football facilities. This in itself should give rise to some consideration of measures that need to be put in place to protect young girls and achieve appropriate segregation. The IFC found nothing specific, still less detailed, in child protection guidelines and policies with regard to girls' participation in football. There are exceptions. At a couple of professional clubs the IFC found codes of practice for "Football in the Community Women and Girls' Football" (though they did not seem at all female-specific). But at another professional club the IFC was told that one of the staff responsible for child protection had raised the issue of sexist language with one of the football authorities and had been laughed at. The same club had expressed concerns about girl mascots having to go into all-male environments often without a parent. Others mentioned the unavailability of lockers at mixed training grounds and the general lack of anti-discrimination awareness. Separate changing rooms for female officials do tend to be provided these days. But, in general, as one CO put it, "an infrastructure for feminine arrangements simply doesn't exist."

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<sup>68</sup> *Child Protection in Football Research Project 2002*, Celia Brackenridge Ltd, p. 74

<sup>69</sup> Figure given in *The FA National Football Development Programme*, 2003. The 2005 Handbook states that 1.66 million girls took part in some form of football in 2004.



At grassroots, the IFC found considerable pride in girls football but often inability to provide particular facilities and very uneven awareness of what the particular needs of girls, particularly the over 10s, might be. Charter Standard is one driving force for good. The criteria for Community status, for example, include there being a minimum of one male and one female team, and a plan for developing both male and female football. Some CFAs have issued some guidance, usually, it would seem, in reaction to encountering specific problems such as a young girl being the last passenger on a coach with a male driver, or mild embarrassments resulting from mis-scheduling the use of changing facilities. Some counties e.g. Dorset, have girls schools of excellence.

But grassroots clubs are enthusiastic about girls football; female coaches are not unusual, working with both boys and girls teams, as do male coaches, and mixed teams do well. Several clubs expressed surprise at how quickly boys, from a position of deep initial scepticism, quickly not only accept girls in the team but respect them, even, as one coach put it, "treating them as equals". A survey of the participation in sport by children in care, published in 2004, found that playing in mixed teams was the most popular way to participate for 42% of those questioned, and that:

*considering that 60% of respondents to the survey were male, this is a huge vote of confidence in mixed teams and shows that even though traditionally 'male' sports such as football and rugby are still the most popular, mixed participation is increasingly the norm for young people<sup>70</sup>.*

There are some excellent developments in girls football, and examples of sensible thinking about caring for girls,

<sup>70</sup> *Who cares? About sport: the participation of young people in care*, The Who Cares? Trust and The Football Foundation, 2004

understanding their needs and the different psychology they bring to playing football. Both well-established and new girls teams at professional clubs have introduced some good practice. At Blackpool, for example, which introduced girls football only in 2004, the club has immediately provided separate toilet facilities, sanitary machines, and ID cards for the players (through the Lancashire CFA). There is always a female escort at training and the club welcomes and accommodates an ethnic mix: this has prompted specific practice to accommodate welfare needs during Ramadan. Doncaster Rovers is famous in female football for the Doncaster Belles, founded nearly 40 years ago. The club has developed a mentoring scheme for the Belles linked to opportunities for players to coach at centres of excellence, part of a programme to encourage young girls to stay with the game.

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practice

There is one theory that, ironically, the rapid predominance of child protection in sport has pushed women and girls' rights down the agenda<sup>71</sup>. This may be one of the reasons for football's perhaps casual attitude to girls. The impression the IFC formed, however, was that there is slowly increasing attention given to girls in football. Many clubs, at all levels, had suggestions about what would be useful areas to cover if there were specific guidance about protecting girls and being sensitive to their needs; several men volunteered a recognition that girls see football as male environment and may be extra hesitant about raising "female" problems. Some of the suggestions are listed in Box 15.

<sup>71</sup> *Women and Children First? Child Abuse and Child Protection in Sport*, Celia Brackenridge, 2004

*some female-specific points in child protection*

- use of mixed changing facilities
- showers
- who may enter changing rooms
- toilet facilities, including sanitary bins and machines
- provision of games and entertainment in clubhouses and professional clubs, to appeal to girl players, mascots etc
- protection of U/18 female employees from unwanted attention
- inappropriate language e.g. language denigrating women or offensive to women
- kit (should it be different?)
- equal opportunities
- harassment
- diet and dieting
- bullying, both by girls and of girls
- "de-masculising" an environment
- identifying and using female footballer role models

BOX 15

## Recommendations

- football authorities to include specific guidance on girls, as players and in other forms of participation, in their child protection policies and procedures
- discrimination awareness to be a clear component in child protection training

## THE VOICE OF THE VULNERABLE

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This report has reflected the tendency in football to regard child protection as being about the protection of under-18s i.e. literally children. The wider definition includes the protection of vulnerable adults, and is the one used by the CRB, for example. The FA is aware of this: The *Child Protection and Procedures Handbook* notes that "Disabled children and vulnerable adults will have to overcome additional barriers before feeling they can disclose abuse" and includes an appendix from a Sport England publication about protecting young people and vulnerable adults. The FA's November 2000 Strategic Plan includes "disabled people" in its title and includes specific targets for the sector, though it acknowledges that many of these have slipped. The 2004 strategic overview added a tenth standard: Protection of Disabled People. The FA child protection materials do attempt to include disability awareness: for example, the CD that accompanies the *Guide* features a disabled young woman and a child with a disability in section four about the need to act if there are concerns about possible abuse; the workshop includes a task concerning young disabled footballers<sup>72</sup>. But overall concern for "vulnerable adults" is very much secondary to the focus on children.

The value and importance of listening to the vulnerable – whether child or adult, able or disabled – is not a strong emphasis in the child protection programme nor, some would argue, football as a whole.

The IFC looked at two aspects of vulnerability:

- child protection in disability football
- consultation with children and vulnerable adults.

As a preliminary, it should be noted that the definition of a "vulnerable adult" is not clear. The best the IFC has been able to find is that quoted in the Home Office publication, *Caring For Young People and the Vulnerable*:

*a person who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation*<sup>73</sup>.

In considering child protection in disability football, the IFC takes into account the same publication's note that all those with physical or other disabilities should not be classed as vulnerable.

### Disability football

The FA has a thriving disability football programme. It launched a specific strategy for it in 2004 with a stated aim of becoming the world's leading governing body in the development of disability football in the next five years. In 2005, there were 14,000 participating in disability football<sup>74</sup>. There are 50 "Ability Counts" clubs nationally, providing opportunities for boys and girls. A stated aim in the November 2000 Strategic Plan was to extend the child protection policy to this sector to include:

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<sup>72</sup> See the *Child Protection and Best Practice Workshop Pack*, p. 91

<sup>73</sup> *Caring for young people and the vulnerable? guidance for preventing abuse of trust*, Home Office

<sup>74</sup> Figure given in *The FA National Football Development Programme Handbook*, 2005

*The protection of vulnerable disabled people, who play and participate in football, enabling them to do so in an enjoyable and safe environment, and the delivery of quality-assured training in the protection of disabled adult and children and the delivery of a network of accredited tutors to facilitate this delivery, with appropriate support.*

However, specific training in the protection of disabled children has yet to come on line, also the tutor network and specialised materials. The FA has a course for coaching disability football, and a section in the FA's *Coaching Disabled Footballers* addresses safeguarding and protecting disabled people<sup>75</sup>. There is also something approaching the designated persons system in that a lot of disability football is in youth clubs and these will have someone knowledgeable about protecting young, disabled people. All players of course should be protected by a club's child protection policy. The IFC understands that the two national U/18 squads each have a designated person responsible for child protection. The CPU advises those working in disability football and is central to the development of materials. Any referrals would go to the CPU and/or case management at the FA, though the IFC is not clear that existing child-oriented systems are sensitive to vulnerable adult cases. All staff working with the national teams go through an enhanced CRB check and Ability Counts clubs are run by FITC staff who are also CRB-checked. Charter Standard criteria also apply to clubs with disability teams seeking the kite mark. In the professional game there is some recognition of special needs. Manchester United is one club whose Child Protection policy includes a code of practice for coaches working with children with disabilities, for example; and Birmingham City's guidance for stewards on away game buses includes reference to vulnerable adults. But there seems to be

little consistent inclusion of vulnerable adults in child protection literature generally, and the feelings described in the Brackenridge report in 2002 are probably still there:

*Clubs wanted specific guidelines to deal with abuse – in particular in relation to wheelchair users, vulnerable adults and those with learning disabilities. Many felt that some of the procedures and knowledge that were taken for granted in the mainstream game are simply not there in disability football. Communication and collaboration on future guidelines was seen as essential*<sup>76</sup>.

It seems to the IFC that child protection measures are coming into place for disabled players, however, and that progress has been made since the Brackenridge research looked at this area. Understanding and awareness should be spreading through the *Coaching Disabled Footballers* course, for example, and events such as the FA's first Disability Football Conference – *The Ability to Succeed* – in December 2004, which included a workshop on child protection in football for disabled children and young people. There are other sources of guidance, from Sport England, for example<sup>77</sup>. It is probably a question of pulling the elements together into a coherent programme and reminding clubs at all levels of the game that vulnerability is not limited to children.

Most important is to give training in the protection of vulnerable adults and disabled children the same attention and status as in the rest of the child protection programme.

## Consultation

In *Working Together to Safeguard Children*, the first measure listed in the section covering

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<sup>76</sup> *Child Protection in Football Research Project 2002*, Celia Brackenridge Ltd, p. 75

<sup>77</sup> *Protecting Disabled Children and Adults in Sport and Recreation: the Guide*, Disability Sport England and BBC Children in Need, 1999

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<sup>75</sup> *Coaching Disabled Footballers*, p. 17

the abuse of disabled children is, "making it common practice to help disabled children make their wishes and feelings known in respect of their care and treatment.<sup>78</sup>" Around this simple precept there should be no differentiation between disabled and non-disabled children. There is a widely-articulated view, however, that football is not yet very good at listening to children, that its culture is anchored in a top-down command approach. The following is perhaps typical:

*For all that the 'Charter for Quality' and the league's own statement of values both have a strong child-centred emphasis, there has been little or no attempt to discover children's perspectives on football ... and football has certainly not provided a forum for children's voices to be heard<sup>79</sup>*

The Brackenridge football research project in 2003 found the child's voice "largely absent", though notably Celia Brackenridge acknowledges this as a problem across sport:

*in sport ... it is still rare to find children consulted or represented in the decision-making process, even in matters of direct concern to them<sup>80</sup>.*

The general concern is shared by the NSPCC. Under the implementation standard, the CPSU will check that stakeholders have a voice and that children can influence development e.g. through child user groups.

In discussion with the IFC this topic was raised quite often and examples given of football omitting to consult or listen. Those who have misgivings about mini soccer for example, questioning whether it is right to give children simply a miniature version of the adult game, suspect that

children weren't asked for views when it was devised. There seems to be little dialogue with academy scholars, students, trainees in decision processes about their future (see page 37). No one ever mentioned to the IFC consultation with children as an element in preparing child protection policies and procedures: this is not to say it doesn't happen or hasn't happened but may indicate low frequency and low prominence. The exclusion of young people from child protection initiatives was picked up by the Brackenridge research team too, which also quoted some CPO/EWO ideas for addressing this<sup>81</sup>: have any been adopted? Children are invited to the FA's annual child protection conference but their role seems to be presentational, though there could surely be opportunity to have them participate in workshop activity. The PL told the IFC that children are included in its COs' conference but how interactively the IFC does not know. On the playing side there seems to be a readiness to involve the children themselves in coaching and team selection, and doing so is encouraged in coaches' training and at academies<sup>82</sup>. At the same time there is evident caution: children cannot always be wise about guarding against injury or exertion, and their competitive instincts can be quite as aggressive as adults' so that giving everyone a chance is not always a priority. Nonetheless, the belief that the coach picks the team, directs the training and knows best seems to prevail. An approach the IFC found at more than one club hits a nice compromise, however. When asked if the children take these decisions, the answer is, "No. We let them think they do. But they don't."

<sup>78</sup> *Working Together to Safeguard Children*, Dept of Health, Home Office, Dept for Education and Employment, 1999

<sup>79</sup> *Football for Children or children for football? A contemporary boys' league and the politics of childhood in British Football and Social Exclusion* ed. Stephen Wagg, Routledge, 2004

<sup>80</sup> *Women and Children First? Child Abuse and Child Protection in Sport*, Celia Brackenridge, 2004

<sup>81</sup> *Child Protection in Football Research Project 2002*, p. 71.

<sup>82</sup> Also found in the Brackenridge research: see 2003 report p. 18



An attractive initiative in the professional game has been the idea of creating a Junior Council to mirror the main Club Board and formally to address some of the issues facing the club. Apparently they

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come up with some very good ideas. This is in place and successful at Blackpool and is being tried elsewhere. Another departure the IFC heard of is having the children and their families, rather than the club, write the club Family Stand newsletter. In academy and youth development literature, the IFC was noted that formulas exist to allow students and scholars to complain, including, in some cases, information about access to a higher authority outside the club. This might be a large step and the process intimidating for a school-age child to take but complaints procedures do offer a hearing. Tranmere and Bolton provide examples.

The line between involving children and giving them unfair responsibilities can be a fine one to judge. An area where this is the case is often in the conflict between school and club, or school and academy, when a child playing for both. There are clear guidelines that, in term-time, the school takes priority when it comes to fixtures. This may not be the child's preference, of course but on the occasions when children are, by both parties, offered the choice themselves, EWOs in particular recognise the potential for subsequent damaging tensions (should, for example, the rejected team lose, or should parents disagree with the decision). Some clubs

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liaise with schools to run child protection workshops at the schools. These seem to work well and genuinely to access childrens' views.

This whole area is one that can arouse strong feelings. One particularly active project, soccervation, feels passionately about it and has initiated a web-based system for consulting children and giving them greater ownership of the game. The projects works with schools in a drive to

bring into football a child-centric bottom-up approach.

Football's child protection strategies have produced a lot of information and advice. It is, largely, passed down and has, largely, been gratefully received. The success in embedding child protection in football's consciousness perhaps has now reached a stage where the game can have the confidence to give more of a voice to recipients, to the beneficiaries. It does happen and this is encouraging. Despite its concerns about football's tendency not to listen, the Brackenridge research acknowledged that:

*This is not to say that the voices of young people are marginalised throughout the game. Interviews at the sample clubs revealed a range of approaches to consultation with young people in developing codes of conduct for parents to the promotion of democratic coaching styles in which young people are invited to question and contribute to tactical and team decision making.<sup>83</sup>*

There is a strong platform on which to build.

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<sup>83</sup> *ibid* 2002, p. 42

## CONCLUSION

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There is not a lot of public interest in youth football, despite its vast popularity in Britain's most popular of sports. Working in this huge unnoticed arena to protect its population may go unnoticed. The IFC hopes this is not the case. The strongest point to come out of the IFC's work on child protection is the immense achievement of English football to maintain a vibrancy in the junior game and to create a genuine culture of awareness and caring about the rights and needs of its participants. Even two or three years ago, the FA's own commissioned research found low levels of awareness and understanding. In almost every situation, the IFC found that progress has clearly been made and that child protection is recognised as fundamental in both the professional and amateur game. Football should be proud of this, and also of the opinion in many quarters that football has led the way in sport and is ahead of other parts of Europe in weaving the protection of children and the vulnerable into football's psyche.

The IFC draws four main conclusions:

1. The achievement is impressive. Now it may be time to slow down a little. The guidance, training, regulation, information have been very professional, comprehensive and manifold but there is a real sense of overload.
2. To maintain the professionalism there has to be a review of resourcing, both human and financial. "Overstretched" was the adjective the IFC heard repeatedly. The commitment of personnel in all areas is wonderful, but there must be a focus on sustainability, ensuring viability is there and that on-going needs such as training can have the necessary investment.
3. The FA's strategy and the PL and FL programmes are supported and respected. The FA and the PL underlined to the IFC that they have the backing of their top management. It is important to the teams, and to those delivering the strategy in the field, that this support is steady and evident at the top of each structure throughout the game.
4. That the best way to build on what has been achieved and strengthen their future in football for the young and vulnerable, is for the three football authorities to work together, with aims and practices common across football. In the combination of all its parts lies football's strength. It is not worth letting tensions get in the way.

The IFC has tried to identify good practice and places where there is real opportunity for consolidation without going back to square one. Looking at the matchday experience is one such area. Campaigns to raise racial and disability awareness have been very effective in football. The matchday platform is a great stage for messages about the value football places on its young and vulnerable, especially demonstrated with behaviours and practice that provide the best kind of example.

The IF will be interested in the next stages of the child protection programme and will willingly contribute to future review and development where it can.

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## SUMMARY SCOPING DOCUMENT FOR WORK ON CHILD PROTECTION IN 2005

The IFC's work in 2005 will follow on from the child protection work initiated in 2004. The principal focus will be on the implementation of central strategies.

In particular , the following issues will be explored:

- the nature and effectiveness of child protection policy and strategy at the FA, the FA Premier League and the Football League
- how this is assisted and monitored
- current priorities and the achievement of key objectives
- provision made at club level to protect children playing, officiating and otherwise being involved in the game
- provision made for girls and the disabled
- the strategic impact on referees
- resourcing
- partnerships
- challenges in the immediate and longer term
- an assessment of the stated achievements and aims of the football authorities in the field of child protection; the perception of stakeholders and, where possible, target beneficiaries.

The work will *exclude*:

Legislative matters; comment on government agendas; the armed services; unaffiliated leagues and clubs; on-field matters and any related disciplinary procedures.

*A copy of the full version of this document is available on request from the IFC office.*

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Amateur Athletics Association	Football League
Amateur Swimming Association workshop	Football Licensing Authority
Audit Commission	Gloucestershire County Football Association
Avon and Somerset Constabulary	International Children's Game Symposium
Birmingham Football Association Charter Standard Clubs Euro 2005 Festival	League Managers' Association*
Birmingham City Football Club	Manchester County Football Association
Birmingham Football Association	Manchester United Football Club
Birmingham Pilot Scheme	Media Group, The
Blackpool Football Club	Middlesbrough Borough Council
Blandford Youth Community Club	Norwich City Football Club
Cambridgeshire County Football Association	Notts County Football Club
Carlisle United Football Club	NSPCC
Celia Brackenridge Ltd.	Oxford United Football Club
Charter Standard Clubs Meeting, Durham	Professional Footballers' Association
Cleveland Constabulary	Queens Park Rangers Football Club
County Support Group Meeting, Cambridge	Reading Football Club
County Support Group Meeting, Leeds	Regional Manager Referees, North-East
County Support Group Meeting, London	Rugby Football League
Criminal Records Bureau	Security Industry Authority*
Doncaster Rovers Football Club	Soccervation
Dorset County Football Association	Sport England
Durham County Football Association	Sportscoach uk*
Essex County Football Association	Stockton-on-Tees Borough Council
FA Premier League	Surrey County Football Association
Football Association	Teesside Athletic Junior Football Club
Football Association Child Protection Conference	University of Gloucestershire
Football Foundation	Woking Referees Association
Football in the Community	

\* consultation by correspondence and/or telephone

### **The Football Association**

*The FA Child Protection Policy*, September 2000

*Strategic Plan for the Protection of Children/Young People and Disabled People in Football*, November 2000

*Child Protection Procedures and Practices Handbook*, June 2001

*Safeguarding Children and Young People in Football: child protection policy, procedures and implementation guidance for grassroots football*, revised edition (draft) June 2005

*Child Protection and Best Practice: workshop pack*

*Child Protection and Best Practice: a guide* (with CD)

Information Sheets: 1 *Advice and support for individuals receiving a disclosure*, 2 *Advice and support for those who have experienced abuse*, 3 *Information for those against whom a complaint of poor practice or an allegation of abuse has been made*

Child Protection and Poor Practice Referral and Information Form

Football Development Programme Charter Standard Clubs: *Club Development Manual*

Football Development Programme, *Disability Football Strategy 2004-2006*

*National Football Development Programme*, 2003 and 2005 editions

*Child Protection Briefing*, issues from 2002 - 2005

Charter Standard Newsletters 2003 -2005

Child Protection Conference: *Doing the Right Things*, conference documentation, 2004

*Handbook*, season 2004-2005

*The Power of Football*, July 2005

*FA Learning – Briefing*, FAMOA newspaper February 2005

*FA Learning – Coaching Disabled Footballers*

*Safeguarding and protecting children in football*, action plan January 2005

*An introduction to child protection and CRB checks*, brochure

*Child protection and best practice: Accredited Workshop Organisers Information Pack*

*The Football Development Strategy 2001-2006*

*Time to Listen: training pack for designated persons for child protection/ welfare in sports organisations*, Reader (jointly with NSPCC)

*Football Education for Young Players "A Charter For Quality"*, October 1997

thefa.com: website downloads on child protection from May 2002 – June 2005

### **The Football League**

Youth Development Annual Reports (anonymised)

*What the Future Holds: options outside of professional football*, 2003

*Youth Development: information for trialists*, 2003

*Youth Development: players' and parents' guide*, 2003-2004 and 2005-2006 editions

*Youth Development Team Record Book season 2003-2004*

*Handbook Season 2004-05*

*Tours and Tournaments Forms*, revised 2005/06 season

www.football-league.premiumtv.co.uk

website downloads on child protection from www.football-league.premiumtv.co.uk

### **The FA Premier League**

*Child Protection at the Premier League*: portfolio submitted to the IFC, 2005

*Handbook Season 2004-05*

*Academy League Handbook Season 2005-2006*

### **Clubs**

Birmingham City: *Child Protection Procedures*

Blackburn Rovers: *the academy prospectus*

Blackpool: *Induction Booklet: Girls Development, Players and Parents*, season 2005-2006

Bolton Wanderers *Academy*

Doncaster Rovers: *Rovers in the Community*

Doncaster Rovers: *Child Protection Foundation Course*, September 2004

Manchester United: *Child Protection Policy and Procedures*, September 2004

Middlesbrough: *Community Project: working in partnership with South Tees ACPC – Child Protection Policy and Guidance*



Notts County FC: *Doing Good For People Doing Good For Football*  
Oxford United: *Centre of Excellence and Youth Development Handbook*  
Preston North End: *Youth Development, Centre of Excellence 2003-04*  
Queens Park Rangers: *Centre of Excellence, Child Protection Document, 2003-2004 season*, and related documents  
Reading: *Youth Academy 2003/04* and related documents  
Tranmere Rovers: *Youth Development Business Plan, 2002-06*  
West Ham United: *Child Protection Policy*

### **County Football Associations**

Football Development Handbooks, 2005  
Essex County FA *Coaching, Referees', Medical and Child Protection courses January-June 2005*  
*Referees' Brochure Season 2004-2005*, Dorset CFA  
Child protection literature (various)

### **Clubs**

Club handbooks, constitutions, child protection policies, regulations (various)

### **Other**

*Refereeing Today*, April 2005

### **Government and government agencies**

The Bichard Inquiry : *Report*, June 2004, *Recommendations*, December 2004  
*Security Industry Authority: licensing door supervisors*, December 2004  
*Caring for young people and the vulnerable? Guidance for preventing the abuse of trust*, Home Office  
*CRB Compliance Report on the FA CRBU*, October 2004  
CRB: *Code of Practice and Explanatory Guide for Registered Persons and other recipients of Disclosure Information*  
*Working Together to Safeguard Children*, Dept of Health, Home Office, Dept of Education and Employment, 1999  
Criminal Justice System: *Guidance on Part 2 of the Sexual Offences Act 2003*  
*What To Do If You're Worried A Child Is Being Abused*, Department of Health, 2003, also summary version  
*Safeguarding Children: Safer Recruitment and Selection in Education Settings*, Dept for Education and Skills. June 2005

### **NSPCC**

*Worried? Need to Talk?*

Review 2003, 2004: *Someone To Turn To For Every Child*  
Child Protection in Sport Unit documentation (various)  
*Full Stop*, NSPCC campaign and appeal to end cruelty to children, November 2004  
NSPCC and Sports coach UK: *Protecting Children, a guide for sportspeople*, third edition 2004  
*Standards for Safeguarding and Protecting Children in Sport*, CPSU, 2003

### **Other organisations**

International Children's Games, Amateur Swimming Association workshop materials, July 2005  
*Child-Safe: a crime reduction initiative*, materials pack  
Doncaster Metropolitan Borough Council: *Child Abuse*  
Football Foundation and Who Cares Trust: *Who cares? about sport*, 2003  
Internet Watch Foundation materials (various)  
*Kidscape Annual Report 2003 -2004*  
Middlesbrough Borough Council: *indecent images of children and the internet*  
Rugby Football League *Child Protection and Implementation Procedures*  
Sport England: *The Framework for Sport in England*  
Disability Sport England: *Protecting Disabled Children and Adults in Sport and Recreation, The Guide*  
Sports coach UK: *Code of Practice for Sports Coaches*  
Sports coach UK: *Are your young people safe? Is your coaching sound?*  
UK Athletics: *Athletics Welfare Procedures (incorporating Child Protection)*

### **Books and research publications**

*British Football and Social Exclusion*, ed. Stephen Wagg, Routledge, 2004  
*Soccer and Society Journal* offprint, Spring 2004. *Children in Football: Seen but not Heard*, Pitchford, Brackenridge et al  
*Women and Children First? Child Abuse and Child Protection in Sport*, Celia Brackenridge, 2004  
*Child Protection in Football: research project reports*, Celia Brackenridge Ltd, 2002 and 2003

## ABBREVIATIONS

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AAA	Amateur Athletics Association
ACPC	Area Child Protection Committee
ASA	Amateur Swimming Association
CAS	County Administration System
CEO	Chief Executive Officer
CFA	County Football Association
CO	Children's Officer
CPO	Child Protection Officer
CPSU	Child Protection in Sport Unit
CPU	Child Protection Unit
CRB	Criminal Records Bureau
CRBU	Criminal Records Bureau Unit
EWO	Education and Welfare Officer
FA	Football Association
FACA	FA Coaches Association
FC	Football Club
FITC	Football in the Community
FL	Football League
FLA	Football Licensing Authority
IFC	Independent Football Commission
NSPCC	National Society for the Prevention of Cruelty to Children
PFA	Professional Footballers Association
PL	FA Premier League
PNC	Police National Computer
RFL	Rugby Football League
SIA	Security Industry Authority
UEFA	Union of European Football Associations
YLWO	Youth League Welfare Officer



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