



GUIDANCE NOTES

POLICY FOR THE GIBRALTAR FOOTBALL ASSOCIATION



CHILD SAFEGUARDING POLICY

This child safeguarding policy has been developed by the Gibraltar Football Association as a sign of our commitment to ensuring that football is both fun and safe for all children to participate in, irrespective of their age, ability or level of involvement. The policy is centred around five goals, or areas for action that should underpin each national association's work to prevent any risk of harm to children in football and to appropriately respond.

While the child safeguarding policy aims to be comprehensive, given the diverse range of settings and levels at which football is organised and played, it is likely that there may be circumstances that are not covered or where there is question about the application of the policy. In such situations, the spirit of the policy should guide any actions, with the basis of these being the children's best interests.

THE FIVE GOALS:

GOAL 1: Laying the foundations for safeguarding

GOAL 2: Ensuring organisational preparedness and prevention

GOAL 3: Raising awareness

GOAL 4: Working with others and reporting concerns

GOAL 5: Measuring success in safeguarding



GOAL 1: LAYING THE FOUNDATIONS FOR SAFEGUARDING

1.ACCOUNTABILITY

1.1.1 Safeguarding is everyone's responsibility.

1.1.2 Everyone who works for or on behalf of the Gibraltar Football Association, at whatever level and in whatever capacity, should acknowledge their duty to safeguard and promote children's welfare and interests, as well as their responsibility to take appropriate steps to implement this policy.

2.DEFINITION OF SAFEGUARDING

1.2.1 For the purposes of the child safeguarding policy, safeguarding is defined as the organisation's responsibility to ensure that football is a safe, positive and enjoyable experience for all children and that all children are kept safe from harm (including abuse) when involved in football, in all capacities and at all levels.

1.2.2 Child safeguarding includes both preventive actions to minimise the chances of harm occurring and responsive actions aimed at ensuring that, if concerns arise, they are handled appropriately. This reflects the need to promote children's interests and comply with both international standards and domestic legislation, particularly about concerns relating to potentially criminal acts.

1.2.3 For the purposes of this safeguarding policy, and in line with the UN Convention on the Rights of the Child of 1989, a child means every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier.

3.WHAT IS MEANT BY HARM AND ABUSE?

1.3.1 Everyone who works for and on behalf of the Gibraltar Football Association, at whatever level and in whatever capacity, should be aware that abuse, harm and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

1.3.2 Harm can occur in many ways and generally means that the safety and well-being of a child is being compromised. This may be because someone is deliberately choosing to misuse their authority or trust and abuse a child, or it may be because of poor practices, potentially caused by a lack of awareness and training, such as an inability to properly supervise children or a failure to act.

1.3.3 Abuse is the mistreatment of a child that causes, or is likely to cause, harm to the child. A person can abuse a child by inflicting harm themselves or by failing to prevent harm from

being inflicted by someone else. Children may be abused by people who are known to them, either in a family environment or in an institutional or community setting. Alternatively – but more rarely – they may be abused by strangers, e.g. over the internet. They may be abused by an adult or adults or by another child or children.

1.3.4 Abuse can take various forms and includes all kinds of physical, emotional/psychological and sexual abuse, neglect and negligent treatment, violence and exploitation, whether it is inflicted in person or online.

1.3.5 Although safeguarding issues are typically thought of as involving an adult mistreating a child, children can also be the perpetrators. This normally occurs when one child is in a position of power or influence (e.g. because they are older or have authority, such as because they are the team captain) and is often referred to as bullying.

1.3.6 In cases of bullying, it is necessary both to support the child being bullied and to think how best to deal with the child doing the bullying, in order to ensure that neither child is harmed, and the welfare and interests of both children are promoted.

4. PARTICULAR SAFEGUARDING RISKS IN FOOTBALL

1.4.1 There are several very specific situations where harm and abuse can occur in football.

1.4.2 PHYSICAL INJURIES: Every sport involves some risk of physical injury, and football is no exception. However, the desire to achieve success and win can mean that children are pushed beyond what is reasonable or appropriate for their age and level of ability.

1.4.3 PERFORMANCE PRESSURE: Winning is an important part of football. However, pushing children to perform and placing them under extreme pressure to achieve success can be harmful psychologically, emotionally and physically.

1.4.4 PHYSICAL CARE: Changing rooms, showers and situations involving close physical contact (e.g. physiotherapy and other treatment) can all provide opportunities for bullying, inappropriate photographs or filming, and sexual abuse.

1.4.5 OVERNIGHT TRIPS: Overnight trips can present many potential risks, including inadequate supervision, children going missing, access to alcohol or inappropriate television content, issues with the use of social media and opportunities for abuse, particularly sexual abuse.

1.4.6 CLOSE RELATIONSHIPS: The team's relationship with the coach and other support staff (such as physiotherapists and doctors) is an

important and beneficial aspect of football. Many children develop close and trusting relationships with their coaches, who are often significant people in their lives, especially if the children do not have positive, supportive relationships with other adults. However, while many coaches foster empowering relationships that are in the best interests of the children in their care, there can also be opportunities to abuse that authority and trust and for children to be harmed.

5. LINKS WITH NATIONAL LEGISLATION OR POLICIES

1.5.1 This policy sets out minimum requirements. All action taken as part of this safeguarding policy must follow relevant legislation where there may be local statutory requirements that must be fulfilled.

6. ACTIONS OUTSIDE OF FOOTBALL

1.6.1 This safeguarding policy focuses on contact with children that occurs in the course of work and activities that are the responsibility of the Gibraltar Football Association, any entity controlled by the Gibraltar Football Association, at whatever level and in whatever capacity.

1.6.2 However, improper conduct occurring outside football activities, be it individually or collectively, can also infringe the principles set out in this policy and undermine the values of football, such as posting inappropriate content on social media, or private sexual activity with children.

1.6.3 If such issues arise, they need to be

considered carefully, and any decision regarding continued cooperation with the individual in question should focus on ensuring that children involved in football are kept safe and their interests are promoted. This may involve a referral to a specialist child protection or law enforcement agency.

7. KEY PRINCIPLES UNDERPINNING THIS CHILD SAFEGUARDING POLICY

1.7.1 Football should be a safe, positive and enjoyable experience for all children.

1.7.2 All children have an equal right to protection (safeguarding) and promotion of their well-being and participation, regardless of their age, gender, sexual orientation, ethnicity or social background, religion, and level of ability or disability.

1.7.3 All child safeguarding actions must be taken in the best interests of children.

1.7.4 Everybody has a responsibility for safeguarding. Children can also play a role in helping to safeguard themselves and other children, although ultimate responsibility for safeguarding remains with adults.

1.7.5 Safeguarding measures should be inclusive and non-discriminatory, recognising that some children (such as those with a disability) may be at increased risk of abuse.

1.7.6 Transparency and openness is essential when it comes to child safeguarding. Abuse and harm can flourish when staff, volunteers, partners, children, families and community members do not feel able to raise their concerns.

1.7.7 All concerns regarding the safety and protection of a child should be taken seriously. Where necessary, appropriate steps must be taken to safeguard the child, potentially including referral to law enforcement and child protection agencies.

1.7.8 No single organisation can safeguard children by working in isolation, so it is necessary to work with other organisations, government agencies (e.g. departments and ministries with a mandate to protect children) and other groups as appropriate.

1.7.9 Confidentiality should be maintained, and the personal details of those involved (including the name of the person raising concerns, the child in question and the alleged perpetrator) should not be disclosed, unless it is necessary to pass on information to ensure that a child is protected, such as when a criminal offence may have been committed.

1.7.10 All safeguarding actions should take place within the framework of relevant national and international laws and policies.

GOAL 2: ENSURING ORGANISATIONAL PREPAREDNESS AND PREVENTION

1. ADOPTION OF A SAFEGUARDING POLICY

2.1.1 The Gibraltar Football Association has decided to adopt this child safeguarding policy together with tools and guidelines. A template safeguarding policy is made available to affiliated amateur and professional clubs.

2.1.2 Everyone who has taken on a role in or related to European football, including at the Gibraltar Football Association and any entity controlled by the Gibraltar Football Association at whatever level and in whatever capacity, must agree to abide by this policy.

2.1.3 The Gibraltar Football Association will help its affiliated amateur and professional clubs to tailor the template safeguarding policy to the needs of their organisation, and these clubs commit to implementing its provisions and certain minimum requirements.

2.1.4 This child safeguarding policy will be available in ENGLISH. A copy will be provided to everyone working for and on behalf of the Gibraltar Football Association, including affiliated amateur and professional clubs through different

channels.

2. IDENTIFICATION OF SAFEGUARDING FOCAL POINTS

2.2.1 The Gibraltar Football Association will identify a safeguarding focal point at administrative level to ensure that this safeguarding policy is implemented and followed within the Gibraltar Football Association. This person will also liaise with safeguarding focal points at other organisations, including affiliated amateur and professional clubs.

2.2.2 All affiliated amateur and professional clubs will be encouraged to identify at least one person to act as a safeguarding focal point.

2.2.3 The role of the safeguarding focal point is to act as a point of contact, and to advise, support and assist the organisation in the implementation of the safeguarding policy and associated procedures, including in response to specific cases and concerns.

2.2.4 It is recommended that the role of safeguarding focal point be assigned to someone with prior knowledge of child protection or safeguarding. However, the role can be given to

anyone who is committed, has the respect of the team and can carry out the relevant tasks. [See the guidelines on the roles and responsibilities of safeguarding focal points].

3. SAFER RECRUITMENT

2.3.1 Safer recruitment procedures will be introduced to help ensure that applicants who could pose a risk to children are identified and prevented from working with them.

2.3.2 Safer recruitment procedures may include pre-selection, selection and post-selection actions to ensure that there are as many safeguards as possible in place.

2.3.3 To prevent unsuitable people from working with children, no one should start working with children until all safer recruitment processes, all background checks and all inductions and training sessions on the safeguarding policy have been completed.

2.3.4 In certain exceptional circumstances, activities can commence before safer recruitment checks have been completed. However, in such situations, additional measures (e.g. additional supervision

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and a strict ban on working alone) must be put in place so that the organisation can be confident that risks to children have been minimised.

2.3.5 Records relating to safer recruitment practices (such as references) must be kept on file. This information must be stored and destroyed in accordance with applicable data protection rules.

4. CODES OF CONDUCT

2.4.1 Clear codes of conduct apply to people working for and on behalf of the Gibraltar Football Association. These set out clear expectations in relation to child safeguarding and detail expected and prohibited behaviour.

2.4.2 All involvement with the Gibraltar Football Association and activities organised by the Gibraltar Football Association will be dependent on the individual in question signing and agreeing to the provisions of those codes of conduct, which will be linked to all employment contracts.

2.4.3 All breaches of codes of conduct will be responded to without delay, with information kept strictly confidential and on a need-to-know basis, in accordance with due process in relation to employment and legal requirements.

2.4.4 If a breach of code of conduct is suspected or reported, investigation by an independent, neutral person with the necessary expertise in safeguarding may be requested through the the Gibraltar Football Association child safeguarding team, which will follow up in accordance with the

formal procedure in place.

2.4.5 As part of any such response, the Gibraltar Football Association will take the necessary measures against the offender for harming children's rights or non-compliance with the Gibraltar Football Association.

2.4.6 Consideration must be given to assessing the risk for the children and whether the offender or offenders concerned should be suspended from the organisation pending the outcome of the relevant investigation.

2.4.7 Codes of conduct will include specific disciplinary measures for non-compliance. These could range from a warning or a suspension, potentially combined with additional training and awareness-raising measures, through to dismissal.

2.4.8 Codes of conduct apply without prejudice to any criminal sanction that may be imposed.

5. SUPERVISION AND LONE WORKING

2.5.1 In general, lone working should be avoided. At least two adults should always be present when working with children. It is acknowledged that this is not always possible, but adults should always work in an open manner where they can be observed by others, preferably working with groups of children, rather than individual children on a one-to-one basis.

2.5.2 Enough adults must always be present to ensure proper supervision of children, bearing in

mind the context and the ages and capacities of the relevant children. Issues regarding supervision and lone working should always be considered as part of any risk assessment.

2.5.3 the Gibraltar Football Association recommends the following adult-to-child ratios: 1 adult per 10; children aged 13 to 18; 1 adult per 8 children aged 9 to 12; 1 adult per 6 children aged 5 to 8; 1 adult per 3 children aged 4 and under

2.5.4 If the number of adults is not enough to achieve the required level of supervision, the activity will be cancelled.

2.5.5 If medical or other intimate care is provided, children should be entitled to have another child or adult of their choice present.

2.5.6 There are certain specific requirements for collecting anti-doping samples from a minor that must be adhered to in the test procedures. Athletes who are minors should be notified of their selection for a doping control in the presence of an adult and may choose to be accompanied by a team representative throughout the entire sample collection session. Should an athlete who is a minor decline to have a representative present during the sample collection session, a witness of the doping control officer must be present during the urine sample provision to observe the doping control officer.

2.5.7 Affiliated clubs participating in [NAME]

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competitions undertake to ensure that the enclosed 'acknowledgement and agreement form for minors' is duly completed and signed for each minor participating. The completed forms must be kept by the national associations or clubs and submitted to the Gibraltar Football Association on request.

2.5.8 Children should not be given personal care (such as washing) if they able to do it themselves.

2.5.9 Changing rooms, showers, etc. should be supervised, but in ways that ensure that children's privacy is protected [see the Safeguarding Toolkit for guidance]. Only adults responsible for the supervision of children should be in the changing room while children are changing. No one else (e.g. photographers) should be in the changing room while children are changing. They should be told when they can enter and when they should leave.

2.5.10 During overnight stays (e.g. in the context of away matches and training camps), children should not sleep alone in the same room as supervising adults, unless the child is related to the adult or the adult has been tasked with acting as the child's guardian by the child's parents or carers.

2.5.11 Clear procedures should be established to deal with situations where a child becomes lost or goes missing or a parent or carer fails to collect a child.

2.5.12 If children can travel to and from activities alone, written permission for them to do so must be given by the parent or another person with the authority to give such permission (e.g. a legal

guardian).

2.5.9 Changing rooms, showers, etc. should be supervised, but in ways that ensure that children's privacy is protected. Only adults responsible for the supervision of children should be in the changing room while children are changing. No one else (e.g. photographers) should be in the changing room while children are changing. They should be told when they can enter and when they should leave.

6. VISITORS, INCLUDING MEDIA REPRESENTATIVES, AT THE GIBRALTAR FOOTBALL ASSOCIATION YOUTH COMPETITIONS AND OTHER EVENTS

2.6.1 The Gibraltar Football Association and everyone tasked by the Gibraltar Football Association with performing a role at the Gibraltar Football Association youth competitions should ensure any visitors for whom they are responsible (including media representatives) are made aware of and understand the principles of this child safeguarding policy and agree to its terms and conditions before the visit takes place.

2.6.2 Visitors (including media representatives) should always be accompanied and should only be left unattended with children in exceptional circumstances (e.g. if conducting research). In such cases, additional precautions must be taken to

ensure that the visitor or observer does not pose a risk to children.

2.6.3 The safety and well-being of children must not be compromised in dealings with the media. Private information such as addresses must not be given to media representatives.

7. ONLINE PROTECTION AND SAFETY

2.7.1 A risk assessment will be undertaken on how the use of technology and media affects the safety of children and the steps that should be taken to eliminate or minimise those risks.

2.7.2 the Gibraltar Football Association will provide guidance on the appropriate use of technology (the internet, mobile phones, social media, etc.) in relation to child safeguarding and the implementation of its safeguarding policy.

2.7.3 Wherever a child can access the internet, filters and blocking software will be installed to ensure that unsuitable, including offensive, material cannot be accessed. Sites that promote the abuse of children or contain images and information that are harmful to children will be blocked on all devices provided by the Gibraltar Football Association.

2.7.4 If offensive material or unsolicited messages are received, the safeguarding focal point should be notified, and they must report the issue to the IT security team so they can improve internet safety, and to the relevant law enforcement agencies. Note that the material or messages in question must not be sent electronically as part of reporting the issue, as this may constitute an offence under international law.

8. THE GIBRALTAR FOOTBALL ASSOCIATION PARTNERSHIPS

2.8.1 Considerable attention should be devoted to issues relating to child safeguarding. Specific references to child safeguarding measures should be included in partnership agreements and contracts, and there should be clarity regarding the actions that will be taken in the event of any child safeguarding concerns arising.

2.8.2 If concerns about child safeguarding arise in relation to a the Gibraltar Football Association partner, consideration should be given not only to whether the concerns need to be reported to the appropriate authorities, but also to whether to suspend the partnership. The procedures agreed to in the contract should be followed. For further guidance, see Section 4.3 on the reporting of incidents.

2.8.3 The raising of a child safeguarding concern in relation to a partner does not automatically mean that the partnership must be terminated. Any decision on whether to continue with a partnership must consider the reaction of the partner and their commitment to addressing the situation.

GOAL 3: RAISING AWARENESS

1.AWARENESS RAISING AND TRAINING

3.1.1 Everyone working for and on behalf of the Gibraltar Football Association, including affiliated amateur and professional clubs, as well as communities, families, children and other stakeholders, should be made aware of the child safeguarding policy and understand how to recognise child abuse and report concerns.

3.1.2 The Gibraltar Football Association will provide dedicated safeguarding training modules (both online and offline) to support affiliated amateur and professional clubs.

3.1.3 Special consideration will be given to how to increase children's awareness of the policy and the various ways that they can help to keep themselves safe. This may involve developing a child-friendly version of the policy and the training modules in cooperation with children.

3.1.4 Specialist training on child well-being, protection and safety may be provided, depending on the nature of the work being undertaken and the role of the relevant staff, volunteers, coaches, etc. together with their backgrounds and experience.

3.1.5 The Gibraltar Football Association will

provide regular updates on child safeguarding, either formally, e.g. in the form of training or supervision, or more informally, e.g. through discussions at team meetings.

3.1.6 While the Gibraltar Football Association provides guidance and training on this policy regarding the responsibilities and duties that are specific to individual roles, all adults have a personal responsibility to seek further clarification and advice if they are not clear about the expectations relating to their role. The Gibraltar Football Association child safeguarding team or the safeguarding focal point is the first point of contact for such requests.

3.1.7 Records must be kept of all training and orientation sessions that are conducted, including dates and lists of attendees. These should be retained in accordance with the relevant data management procedures.

2.RISK ASSESSMENTS

3.2.1 Risk assessments are an important element of any safeguarding process. They form the basis for preventive action by making sure that activities are safe, and any risks identified are eliminated or minimised, and they also determine the specific action that should be taken in the event of any safeguarding concerns.

3.2.2 When organising activities (such as competitions), a risk assessment should be undertaken to identify any potential dangers, with a plan put in place to minimise those risks. The responsibility for ensuring a risk assessment is undertaken rests with the person with ultimate responsibility for the activity.

3.2.3 If an assessment concludes that there are too many risks that cannot be reduced to an acceptable level, the activity should not go ahead.

3.2.4 Emergency contact details and medical information must be collected for children before they participate in physical activities, and that information must be available to everyone who has a duty of care for those children at those events.

3.2.5 Risk management measures are reviewed on a regular basis, both during and at the end of activities, so that lessons learned can feed into future activities and necessary adjustments can be made.

3.CREATING A SAFE CHANNEL

FOR RAISING CONCERNS

3.3.1 A clear procedure for reporting concerns must be established and communicated to everyone working with the organisation. Including children, families and communities.

3.3.2 A reporting flowchart will explain how concerns are managed. The main point of referral will be the safeguarding focal point.

3.3.3 The reporting flowchart and associated procedures will be discussed with the relevant child protection or law enforcement agencies to ensure that processes are aligned (see also Goal 4 below).

3.3.4 The Gibraltar Football Association will allow for concerns to be raised (including anonymous reporting). Written complaints can also be sent to the Gibraltar Football Association.

3.3.5 The Gibraltar Football Association guarantees the total confidentiality of the process and the documents to which it would gain access as part of the informal procedure.

3.3.6 If concerns are raised but not substantiated, no punitive action should be taken against the person raising those concerns, provided that there was no malicious intent.

3.3.7 Written records of all reports received (even vague reports) must be kept in a secure, confidential location by the safeguarding focal point.

3.3.8 All concerns raised will be taken seriously and responded to in accordance with this safeguarding policy and the procedures established under this policy. See also Goal 4 below.

GOAL 4: WORKING WITH OTHERS AND REPORTING CONCERNS

1. ESTABLISHING LINKS WITH CHILD PROTECTION AGENCIES

4.1.1 Links must be established with the police and relevant child protection and law enforcement agencies with a view to facilitating referrals where concerns arise and seeking specialist advice and support as necessary. This will also be necessary so the police and relevant agencies can sign off procedures for the reporting of concerns.

4.1.2 Local contacts at child protection and law enforcement agencies should be identified in advance in order to facilitate referrals. Contact details should be retained so that cases can be referred quickly and efficiently.

4.1.3 Safeguarding focal points and other staff are encouraged to attend child safeguarding and child protection training offered by other organisations.

2. CREATING AN OPEN WORKING ENVIRONMENT

4.2.1 If support or advice is sought regarding child safeguarding, this must be taken seriously. The seeking of advice or support should never be regarded as indicating that someone lacks ability or knowledge or is spreading rumours, etc.

4.2.2 If people working for or on behalf of the Gibraltar Football Association are involved in child protection incidents – either as the subject of an investigation or as a witness – appropriate support must be provided. This may involve additional supervision or counselling.

3. REPORTING OF INCIDENTS AND FOLLOW-UP MEASURES

4.1.4 All reporting, investigation and management of safeguarding incidents must be in line with national law. When considering whether to refer a child to an outside agency for protection, the legal framework in the relevant country and the best interests and wishes of the child must always be considered.

4.1.5 Therefore, only people whose participation is necessary for investigating concerns or supporting the child, be it medically or psychologically, may be involved. A record of each intervention must be drawn up, signed by the people involved and sent to the the Gibraltar Football Association child safeguarding team.

4.1.6 Referrals to local child protection and law enforcement agencies should be made in the manner prescribed by the agency; agencies may, for example, have a preferred format for reporting. If a referral is made verbally, it must also be confirmed in writing.

GOAL 5: MEASURING SUCCESS IN SAFEGUARDING

1.AWARENESS RAISING AND TRAINING

5.1.1 Ultimate responsibility for the implementation of the child safeguarding policy lies with the the Gibraltar Football Association child safeguarding team.

5.1.2 At least once a year, the Gibraltar Football Association will assess its safeguarding arrangements and the implementation of its safeguarding policy.

5.1.3 Based on that assessment, an annual plan of action should be developed to address any gaps in the implementation of this policy and minimise any risks identified.

5.1.4 At least every three years, the Gibraltar Football Association will ask affiliated clubs to assess the situation at their own organisation, to provide an overview of safeguarding arrangements across the country.

5.1.5 This child safeguarding policy is a living document and will be reviewed every three years.

5.1.6 Periodically, the Gibraltar Football Association may seek an external evaluation of the implementation and appropriateness of its safeguarding policy and the associated procedures.

FINAL PROVISIONS

This policy was adopted by the Gibraltar Football Association on and enters into force on the same date. The Gibraltar Football Association empowers the administration to adopt any guidelines or other documents deemed necessary to implement this policy.

For questions regarding this policy, please contact the Gibraltar Football Association lead safeguarding person.



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