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**The Report of the Independent Review of Sexual Abuse in
Scottish Football**

July 2020

THE REPORT OF THE INDEPENDENT REVIEW OF SEXUAL ABUSE IN SCOTTISH FOOTBALL

Introduction

Football is our national game. It represents, probably, our largest and most significant cultural institution. Football's reach touches almost every family and community in the land. Historically it has acted as an expression of our country's aspirations and hopes often focussing the hearts and minds of our nation. For well over a century young people have benefitted from supporting and playing the game at all levels and in all parts of the country. Currently, approximately 325,000 children and young people participate in Scottish football (UEFA European Benchmark – Kantar (2019)). This is an astounding number and makes football the leading participation sport amongst children in Scotland. Many more are spectators and supporters. For some it has been the mainstay of their formative years. It is the subject of folklore and myth, of debate and passion, hopes dashed and dreams realised. But most importantly it has been a place where young people have invested their time, their ambition, their skill and their energy for generations. For some it has provided a refuge from other stresses and concerns, for others a focal point for their personal development and wellbeing leaving them with skills and benefits to last a lifetime.

However, for others, football in Scotland has come to represent a very different picture. A source of trauma and torment, a site where they experienced the unimaginable at key points in their young lives leaving many of them with legacies of trauma, pain, depression and anxiety. Football for some young people became synonymous with experiences that left an indelible negative and distressing imprint on their lives – a legacy characterised by shame, confusion and self-doubt.

The impact of these experiences and of the actions of the individuals who perpetrated them is incalculable with significant cost to personal and family relationships; mental and physical health and wellbeing; financial and material security; education and employment; community solidarity and belonging; confidence; self-acceptance; trust; and so many other aspects of their lives. For some the struggle to deal with what has happened to them within football has been extremely arduous and marked by regular setbacks. For others they have managed to greater or lesser extents to overcome these experiences sufficiently to build successful futures. Tragically however some have not survived.

Whatever the impact and however the individual may have been able to deal with these experiences, many have largely done so in silence struggling for many years with confusion, guilt and recrimination alone, deprived of the support and understanding of those around them and from the justice to which they are unquestionably entitled.

But many have now come forward despite considerable odds to articulate their experiences, mostly for the first time, and to seek public redress for the serious wrongs which have been done to them under the auspices of our national game. Football and Scottish society are indebted to them for their courage, determination, resilience and forbearance. It is also important to recognise the difficulty faced by their families when these experiences are brought to light at the same time as recognising and commending the strength, love and support which they continue to provide to their loved ones who have been so intimately and personally affected by sexual abuse and exploitation.

The decision to be open about these experiences whether by giving testimony in legal proceedings, talking to the media or contributing to the Independent Review was for most an extremely difficult one requiring them to put into words experiences and feelings which most people would find almost impossible to describe.

The Independent Review also fully understands why many people personally affected by sexual abuse in Scottish football have still not come forward. This is not because they lack courage or are less interested in personal resolution or justice. Quite the contrary. The barriers they face are enormous.... created by a society which has historically doubted the histories of 'survivors'; attributed them with dishonourable motives; been steeped in denial; and created a narrative around sexual abuse and its impact which – sometimes but not always inadvertently – reinforces the strong sense of shame, guilt, fear and self-blame which individuals associate with their experiences.

Sexual abuse is not a "historical" issue. It is not something confined or consigned to our past. It is not an aberration driven by societal conditions long overcome or outdated. The preconditions and possibility of sexual abuse in families, in communities and in sport remain and endure. The impact on those harmed in the past endures. We may have taken steps to improve the protection of young people through

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increased awareness and creating pathways for reporting but we have not significantly tackled the *prevention* of child sexual abuse nor have we confronted fully its legacy.

The Independent Review of Sexual Abuse in Scottish Football was set up to consider these issues and to make recommendations for change. To do so the experiences and narratives of people personally affected by sexual abuse in Scottish football have been central. They were not simply the focal point of our concerns and deliberations but provided the main lens through which we viewed the past and assessed the present.

We are also well aware that the issue of child sexual abuse has affected a great number of social institutions, agencies and organisations from sport to broadcasting to faith communities to residential and foster care and more. It has also been a feature of family and community life in Scotland to an extent which is still largely unknown.

Public concern persists. Periodically allegations concerning non-recent sexual abuse in institutional settings elevates this concern as do other media reports of more recent abuse in families and communities.

Historically our understanding of child sexual abuse, how it occurs, what it is and how it impacts individuals, families and communities has come mainly from the accounts of people who have been personally affected by it.... that is, people who have been abused. Academic discourse and research as well as professional experience has also helped us to develop our understanding.

So, the primary objective of the Independent Review has been to contribute to *learning*. That is, through understanding what happened and the circumstances surrounding non-recent incidents of sexual abuse; examining the developments in Scottish football since these events concerning the protection of young players; and assessing current arrangements and issues, the Review set out to identify what lessons can and should be learned. With this knowledge it has been the intention of the Review to provide a range of recommendations aimed at ensuring, as far as is possible, that these experiences cannot be repeated and that young people are able to engage in our national game with their safety and wellbeing paramount. A range of recommendations were made in the Interim Report of June 2018 and these are repeated in this Final Report along with update positions pertinent to each so that progress since 2018 can be gauged.

The aims of the Independent Review are in accordance with the views of those who have been personally affected by sexual abuse in Scottish football. Indeed, this process and its outcomes form part of the justice to which they are entitled.....the undertaking that the possibility of sexual abuse in Scottish football is eliminated and that no young person, now or in the future, experiences what others have personally endured and the impact it has had on their lives. This undertaking is one which the Review takes seriously and which it is hoped the entire football family, and indeed all Scottish society, will share.

But the efforts and commitment of people personally affected, their families, their allies and the Review are only properly satisfied and justice met if real improvement and change is realised. The confidence of Scottish society and the football community in our national game has been damaged by the events of the past. This needs to be restored but in a meaningful and effective way – not through cosmetic change or knee-jerk. So often in the past reviews and inquiries have not demonstrably led to effective change and the right outcomes. It is outwith the ambit of the Independent Review to *deliver* the change we recommend but it is the responsibility of those in leadership in Scottish football to do so.

It is also within the gift of Scottish society through vigilance, effort, commitment and participation to see that these changes are followed through by holding football to account. This will bring us nearer than ever to a day when our young people can derive every benefit from our national game in full safety and in the knowledge that their wellbeing is paramount. It will also be an important contribution to overcoming the blight of child sexual abuse in Scotland.

How did we review these issues in Scottish football?

The Review engaged directly with 240 individuals as part of the Review process.

A further identified 71 individuals who had been personally affected by sexual abuse in Scottish Football, including family members and friends, engaged with the Review.

33 individuals provided personal accounts including actual allegations of sexual abuse in Scottish football directly to the Review. The vast majority reported relevant information to Police Scotland as

part of the criminal enquiries. These people provided their personal accounts and information to the Review mainly in face-to-face meetings and a small number by telephone conversation and/or email.

A small number of parents of these individuals also engaged with the Independent Review.

The allegations of non-recent sexual abuse provided to the Independent Review related to the activities of 11 perpetrators/alleged perpetrators. Of these 5 are believed to now be deceased. One died during the period of the Independent Review and before criminal prosecution could run its course.

The Review gathered, considered and deliberated on 251 documents related to the protection and wellbeing of young people in Scottish football, football governance and football operations across the Scottish game.

The Independent Review considered a wide range of information which, consistent with the Terms of Reference for the Review, is broadly categorised as:

- Individual accounts of the events and incidents of non-recent child sexual abuse in Scottish football mainly occurring in the 1970's, 80's and 90's.
- The safeguarding 'journey' within Scottish football from the 1990's until recent years
- The current arrangements and issues in Scottish football related to the wellbeing and protection of young people from sexual abuse and exploitation.

The range of information considered by the Review has come through:

- personal accounts given by those directly affected by non-recent sexual abuse in football;
- recollections of those who were active in football at the time in question or who held relevant knowledge concerning specific events or more generally about the sport at that time;
- open-source research of the circumstances within football clubs and organisations during the relevant period;
- open-source research concerning individuals especially those convicted or accused of sexual abuse in Scottish football
- discussions with investigative journalists and media;
- meetings with club officials, senior managers and relevant personnel including protection and wellbeing officers across the Scottish game;
- accounts of past professional players
- interviews of officials from football related organisations, the Scottish FA, partner agencies, Affiliated National Associations, and others
- meetings with sports agencies
- contact with relevant external agencies
- consultation events with young players
- consultation with football supporters

The Review considered and deliberated on all this information over a period of three years and reached findings and conclusions which in turn inform the recommendations for change which have been made.

Section One of this Report deals with the allegations of non-recent sexual abuse in Scottish football and essentially, as per the Terms of Reference for the Review, addresses three main questions: -

- *Who in Scottish football knew about these matters at the time?*
- *What did they know?*
- *What did they do?*

To adequately and openly answer these questions this section of the Report therefore deals with important issues of **accountability and responsibility** in relation to a duty of care to young people. But it also highlights the experiences of the individual young people concerned and the impact of these experiences on their lives growing up. These take the form of individual accounts as presented to the Review although they have been edited or redacted as appropriate to this public report. Each account is presented under a short (anonymised) reference to the offender/alleged offender concerned and their activities in Scottish football. Where more than one account of abuse concerning a single offender was provided these are grouped together.

These personal accounts, though abridged and redacted for the purposes of inclusion, make difficult reading which understandably will distress many. These are included to ensure that the reader understands the *serious* nature of what occurred and the *personal* impact this has had on those

involved. They also provide the “evidential” basis for the findings as per the Terms of Reference and most of the recommendations of the Review. Without full understanding and recognition of these the lessons which we highlight and the reasons why change is urgently needed could be minimised or overlooked. This would be a failure of those who have come forward (and the many who have not) and detrimental to the process of improvement necessary for the protection of children and young people today and in future. These accounts also form part of a more general narrative concerning the experiences of survivors of child sexual abuse in Scotland. To that extent *they contribute to a more widespread but vitally important public archive of our national life which requires to be recognised.*

Section Two describes the ‘journey’ of improvements and changes in the protection of young people and the reduction of risk in Scottish football in recent years (up to the publication of the Interim Report in 2018).

Section Three addresses the arrangements within Scottish football as of June 2018 and whether these were considered enough to protect young people in football and to reduce risk. It also contains a commentary on progress made (since June 2018) to June 2020 in implementing the recommendations of the Interim Report which was submitted to the Scottish FA and made public.

The Recommendations are dispersed throughout the Report. The Recommendations of this Final Report are, for the most part, those that have already appeared in the Interim Report. These are included again so that, where possible, their relevance to the narrative accounts of contributors as presented in Section One can be seen. It should be noted that in a few instances some recommendations are slightly altered from the version that appeared in the Interim Report. Furthermore, the recommendations are the direct consequence of what the Review was told and our deliberations on this information.

The Review is grateful to the Scottish FA for providing a progress report on the implementation of each of the interim recommendations. This has allowed the Review to present an update following each of the Recommendations in this report which had featured in the Interim Report of July 2018. This should help the reader see what progress has either been achieved or is planned relevant to most of the recommendations already made in the Interim Report.

The Recommendations are numbered but this does not infer an order of priority. We believe all the recommendations are essential to improve the capacity of Scottish football to protect young people and reduce risk. But they are not an exclusive list of measures which we think need to be put in place. A process of *continuous improvement* through proper outcomes and evaluation across the game should ensure that improvements are implemented beyond those that are reflected in the recommendations in this Report. The recommendations of the Review therefore should be seen as a *starting point* rather than an exhaustive list which, once implemented, will be sufficient to protect young people and reduce risk in the longer term.

As part of the process, consultations were also undertaken with young players and with football supporters. The findings from these exercises are looked at within the Report and the summaries of both consultations are attached as Appendices.

An Executive Summary accompanies this Report which highlights the key messages. The Executive Summary does not replace the content of the substantive report which should be read and understood if those who have been personally and directly affected by sexual abuse in Scottish football are to be properly heard and their expectations (and those of the Review) met. At its most basic, this is that the errors and omissions of the past should not be repeated and young people participating in Scottish football now and in future should never have to endure the experiences referred to in this Report.

That is a serious undertaking which this Review believes all in Scottish football should constantly make.

SECTION 1: NON-RECENT SEXUAL ABUSE IN SCOTTISH FOOTBALL

1. Introduction

1.1. The Terms of Reference for the Independent Review require that we “*review what if anything the Scottish FA and/or any of its members and/or affiliated and/or associated organisations knew in relation to these matters at the relevant time and what action did and should/could have taken place at that time; consider whether or not and to what extent the Scottish FA was aware of the matters highlighted and now brought to its attention; consider what steps were taken by the Scottish FA during the relevant periods in relation to the protection of children brought to its attention at that time and; identify any failings or deficiencies on the part of the Scottish FA in that regard; consider what steps were taken by its members and/or affiliated and/or associated organisations, either at the time of them being made aware or subsequently, and identified as relevant to the alleged incident(s) and to those concerned (including) responses, decisions and actions either taken or omitted; and, consider what lessons have been learned by the Scottish FA and its members and/or affiliated and/or associated organisations since those incidents took place and following any investigations that have taken place to ensure that the risk of abuse is reduced and where possible eliminated.*”

1.2. Essentially then the main questions for the Review were: -

- What was known about these matters at the time within Scottish football?
- Who (in Scottish football) knew at the time? and
- What action was taken (or not) as a result?

These are essentially questions of *accountability* and *responsibility*. The Review is not concerned with attributing *culpability* or *liability* – these are matters which only the Courts could decide. However, issues of accountability and responsibility lie at the heart of the Review’s deliberations and form the basis for the Terms of Reference. Attributing blame and engaging in a finger-pointing exercise is not helpful and is almost always unproductive, detracting from ensuring the right change takes place with the commitment of us all. This is all too often an aspect of our national conversation about ‘historical’ child sexual abuse, but it is one which this Review urges people within football, in the media and in the wider public to guard against. As such the narrative of ‘failure’ and ‘blame’ is one which the Review is keen to resist in order to focus on learning and improvement which is of more productive value.

Children and young people were harmed *because of the actions of individuals*. Their responsibility for their actions is inescapable and it is right that this should be made explicit where possible through prosecution. However, going beyond the actions of those individuals who actually perpetrated abuse there is a wider issue of accountability based on a *duty of care* to young people on the part of organisations and exercised by those who worked within them. If young people were exposed to risk or to harm because of the actions (by commission or omission) of those responsible for the organisation and delivery of football, then accountability for this and for its consequences need to be attributed, understood and acknowledged. However, this only has any real purpose if those **now** in positions of responsibility can draw lessons and urgently deliver improvement.

1.3. This Section of the Report addresses these questions and provides the findings of the Review. These are based primarily on the personal accounts of those directly affected which were provided to the Review; accounts given those who were around in the relevant clubs and organisations at the time; and any other party believed to have information of interest to the Review in respect of the matters.

1.4. It should be borne in mind that contributions were entirely voluntary, and the Review is extremely grateful to all those who came forward to contribute their recollections and other information.

1.5. The definition of '*non-recent*' adopted by Police Scotland and other agencies is *circumstances where in excess of one year has elapsed between when the event is said to have occurred and the event being reported*. However, to observe the Terms of Reference for the Independent Review we have included and considered *all* instances of sexual abuse or alleged sexual abuse brought to our attention which are within the ambit of Scottish football.

1.6. The issues of serious concern leading to the commissioning of the Independent Review and the overwhelming majority of circumstances considered by the Review relate to events which occurred in the 1970's, 1980's and early 1990's.

1.7. However, it would be a grave mistake to believe that sexual abuse in Scottish football is therefore a 'historical' issue – an anomalous set of events that belong to a past which was less aware, less responsive or less prepared. This is not the case. The sexual abuse of children and young people is not something which can be easily 'eradicated'. The risk remains across our society and of course within Scottish football. Unless concerns are satisfactorily remedied it is the view of the Independent Review that the potential for children and young people participating in Scottish football to be sexually abused or exploited may remain unacceptably high (insofar as there is a continuing level of risk across Scottish society which cannot be entirely removed). It is encouraging that the Scottish FA and its members, following the Interim Report of the Independent Review, have taken serious steps to deliver on many of its recommendations for improvement.

1.8. It is vital to acknowledge that, as a society, and as a sport, we cannot guarantee the removal of **all** risks of sexual abuse and exploitation. To an extent, we must understand that as long as there are people who have a predisposition to enter into harmful behaviour with children and young people the risks and the serious impact of this will continue. For most of us this is unpalatable yet something which has to be understood if we are to focus on doing the right thing in the right way. But nor should we simply settle for tacit acceptance that such individuals will always be in our midst therefore sexual abuse has an air of inevitability. Sexual abuse of children and young people is not inevitable and a serious responsibility lies on individuals, families, communities, institutions and society to do all that can be done to **prevent** sexual abuse occurring in the first place.

1.9. It is the view of the Independent Review that by tackling the thinking and behaviour of people with a sexual interest in young people we can, as a society, take significant steps to prevent sexual abuse from occurring in the first place or from re-occurring. We accept that the responsibility for protecting children and young people from harm lies first and foremost with *adults* and that this requires adults – across society – to adapt their thinking and behaviour to make sure that this responsibility is carried out. Therefore, as a society we understand that vital changes are needed as to how we understand this issue and how we provide for children and young people. These will make a significant contribution to reducing the likelihood of the occurrence of sexual abuse.

1.10. As far as the Independent Review is concerned it is also essential that *everyone* seriously considers and remembers the impact which abusive experiences have on the lives of those who are personally and directly affected. This endures every day in a multiplicity of ways for those concerned. Our awareness of this should not just lead to better responses and provision after the event but to a lasting and explicit commitment to ensure that across Scottish football, and more widely, sexual abuse does not occur in the first place. Those who have been personally affected by these experiences in Scottish football expect nothing less. Delivering meaningful

and genuine change to ensure that sexual abuse is prevented is as much part of the delivery of justice for them as any achievable through the criminal or civil justice system.

1.11. From the outset the Independent Review has set out to *learn* from the painful experiences of the past as well as by scrutinising recent and current processes, structures, procedures and policies. As such, the Independent Review was set up as a “review of safeguarding” – (that is with a clear focus on the protection of children and young people) - with particular attention to sexual abuse and sexual exploitation in Scottish football.

1.12. In relation to non-recent sexual abuse it was not the remit of the Review to determine *what* happened or the guilt (or otherwise) of the accused. That falls to the criminal justice process. Nor was it the business of the Independent Review to attribute liability in respect of any of these matters. This falls to the civil justice system to determine. The Independent Review set out to arrive at conclusions as to who (within Scottish football) at the time knew of these allegations; what they knew; and what they did (or otherwise) as a result so that learning can be derived, and necessary changes and improvements made.

1.13. Accounts provided by those directly affected were accepted *prima facie* by the Review as real and genuine. We have no reason to doubt the veracity of any of these accounts. We understand, as do the individuals concerned, that the time that has elapsed since may affect some of the margins or the detail of their recollection. Conversely however we have been impressed by the way in which some individuals have been able to recall even tiny details and observations relating to these events. This has, in our view, only supported our wish to ensure that contribution to the Review did not create further unnecessary distress and upset to people by prompting them to relive these experiences. We do understand however that, irrespective of the Review, many have either lived with these stark memories for a long time and/or struggled hard to ensure that these memories did not adversely dominate their lives. We are more than conscious of the price they pay in their daily lives for ‘containing’ these recollections.

1.14. The Review wishes to make sure that we acknowledge how distressing and difficult this has been for everyone directly affected and how, for some, this continues beyond the Review, beyond the criminal cases, and outside and beyond the glare of media publicity. We must also remember that many people still have not chosen to come forward (either to the criminal investigation or to the Review) and that, for them, this struggle is a continuing, real, and powerful influence in their daily lives.

Those affected who engaged with the Review

1.15. During the period in which the Review was active we consistently placed the accounts of those personally affected at the centre of our considerations. Although our recommendations have also been influenced by other factors, we have been careful to ensure that these largely also correspond with the views of those directly affected and with the circumstances leading to or surrounding these events. Accordingly, the focus of this Review was on *protecting children and young people* and the recommendations are therefore entirely directed to bring about the changes needed in processes, structures, policies, provision and culture capable of ensuring, as far as possible, that such events do not occur again.

1.16. The approach of the Review was to ensure that those personally affected were not subject to further pressure or distress in order to participate in the Review. Since most (with some exceptions) had only recently disclosed or reported these experiences and many had made lengthy statements as part of criminal investigations it was our view that such discomfort or stress should not be replicated by the Independent Review either in what we did or how we did it. The Review therefore did not seek out and pursue individuals directly. Instead, through a wide range of intermediaries, details of the Independent Review process were widely provided so that individuals could choose for themselves whether to participate and how to participate

should they wish. Although the option of contributing through questionnaire was made available no individual chose this route. All of those who engaged directly with the Review did so either face-to-face or by telephone or email.

1.17. Not only was participation in the Review process voluntary it was also made clear to contributors who wished to engage that the Review was not 'legalistic' in either its Terms of Reference or style; that contributions would remain confidential unless permission was explicitly given otherwise; and that we would not have any expectation that they reveal to the Review any more personal information than they themselves wished. Participation therefore was always, as far as possible, under the control of the individual. We endeavoured to engage with sensitivity, tact and solidarity to develop a relationship capable of maximising the learning which could be gained from these difficult and harmful events and of supporting the individual in making their contribution.

1.18. All of those who made allegations of sexual abuse in Scottish football who engaged with the Review were male. We also considered two further situations where the young person directly affected is female – however these two young women have not engaged *directly* with us although their parents (in both situations) have been contributors to the Review. The two young women concerned were aged 14 and 15 respectively at the onset of the sexual abuse that occurred. Interestingly these two 'cases' occurred in more recent years (i.e. since 2000) whereas every 'case' considered by the Review occurring before 2000 involved boys and young men. This probably illustrates wider changes in the game in more recent years particularly in relation to female participation in all aspects of football. Whilst it is vital to consider issues of prevention, occurrence, and impact of sexual abuse/exploitation in relation to the specific circumstances and needs of boys and young men, the Review is acutely aware of the risks and issues facing girls in sport (and in football in particular).

It is strongly suggested, in planning and implementing change, that the sequelae of sexual abuse should be considered separately for boys and for girls as necessary. Sex/gender differences in how sexual abuse occurs and is experienced, from a victimological perspective, are extremely important in targeting prevention measures and in determining the right responses.

1.19. In relation to those who contributed their personal accounts to the Independent Review the age range of individual young men (at the time of the onset of the alleged abuse) is between 6 and 16 years with an average age of 12 years and 3 months of age at the onset/occurrence of the abuse.

1.20. All of the circumstances described to the Review involved alleged abuse within *relationships of trust* where adults either apparently developed such relationships in order to sexually abuse or used the existence of such a relationship to create opportunities to abuse and/or persist in abusing young players.

1.21. There are no other significant factors concerning these young men except that the overwhelming majority were of white Scottish ethnicity. None had recorded physical disability or learning difficulty at the time of these events. We did not deliberately gather any information concerning the sexual orientation of the men affected although (as we will consider in greater detail elsewhere) many experienced significant negative confusion concerning their developing sexuality as a direct consequence of the abuse they experienced beyond the developmentally expected issues about sexual identity that arise for adolescent boys in any case. The socio-economic background of these young men was almost entirely that they came from urban/suburban working-class backgrounds where the parent(s) was/were in employment.

1.22. A number of those who engaged with the Independent Review expressed a discomfort with the term 'survivor' and did not identify with the term. For some, this may reflect how they construe their experiences. For others, it is a reflection of their personal acknowledgement of the impact of these events on their lives and they were keen to establish that these experiences are not the sole determinant of who they have become as menin other words that they have worked hard to resist these events 'defining' them as adults. Many were clear that, for them, the impact of these experiences on their life course has been (and is) significant but that they endeavour to make sure that these do not become a central aspect of their identity or current world view. For the purposes of this Report therefore we have avoided use of the term 'survivor' where possible in respect of these views.

1.23. The Review has also had the advantage of engaging with others who have been affected by these events such as family members, friends and teammates. Their perspective has also been invaluable in piecing together who may have known what at the time and what was (or was not) done as a result. They have also been important contributors helping the Review identify what needs to change to improve the protection and wellbeing of children and young people in future.

Acknowledgement and Apology

1.24. Although we are clear that the direct responsibility for the alleged abuse of these young people and the consequent harm lies with the men who perpetrated or are said to have perpetrated these acts, we are also very aware of the *accountability* which lies with clubs and organisations in football since these shared a duty of care to the young people in their charge.

1.25. Apology should be made not just because the Review recommends it but more importantly because ***it is the right thing to do***. This issue was highlighted in the Interim Report of the Independent Review in June 2018 in the hope that the clubs and organisations affected would reconsider their stance in the meantime and finally render the acknowledgment and apology so urgently needed.

1.26. The Review acknowledges that the process of apology has already been initiated by the previous Chief Executive of the Scottish FA and was further acted upon by the current Chief Executive and he is to be commended for his actions especially meeting face-to-face with the individual(s) who had come forward with allegations of sexual abuse in football.

1.27. The Review welcomes the statement from the Scottish FA in which it "*apologise(d) to the survivors and anyone who has been the victim of abuse in Scottish football*" and also the recognises and welcomes the recent public statement by Celtic FC in which it "*reiterates its sincere sympathy, regret and sorrow for those affected*".

1.28. The Review is aware of the complexities for clubs in arriving at this position but remains firm in the view that it is the interests of survivors and the compelling ethical considerations which are most important.

1.29. The Independent Review however again calls on *all* clubs and organisations involved to make a clear, unreserved, and public acknowledgment and apology to all those directly affected by the abuse which took place and for the harm which was done.

1.30. It does not require for these matters to have been tested in a criminal court for acknowledgement and apology to take place. All it needs is for individuals to adopt a compassionate response and decide, on the basis of simple human solidarity, to acknowledge the harm that has occurred and apologise for the events which took place under the organisation or club's watch. Acknowledgement and apology do not eradicate the harmful

events or the pain that has resulted. But for many this will be a starting point for reconciliation and for healing and this is of vital importance.

1.31. The Independent Review considers it inadequate for clubs or organisations to avoid this issue because, in the intervening years, they have changed their governance, their name or their company status or ownership. The ethical obligations remain and are uninterrupted irrespective of intervening administrative, constitutional or commercial changes. Since to make full apology does not affect civil litigation proceedings the Review does not consider it relevant to refuse to acknowledge or to make apology on the basis that commercial ownership and associated liability may have changed. In other words, a duty of care to young people is a constant and is, in the opinion of the Review, part of the legacy of the organisation or club and its successors.

1.32. It is understood that there is a widespread perception (within football and outside of it) that, for institutions and organisations, making a public apology would be seen as an admission of 'liability' in any possible civil proceedings. This is a regrettable position which has been a real barrier to progress in the past across many institutions affected by non-recent sexual abuse. But, in the opinion of the Independent Review, it signifies a deeper and perhaps more pernicious narrative that those who were abused and who have come forward are doing so with dishonourable intentions or for financial gain. This is contrary to the view of the Independent Review and is a position that requires to be challenged and refuted. Where compensation or remedy is available through civil proceedings this is a matter for the courts concerned and not for uninformed speculation. But it is well that we remember the very substantial and serious barriers that hinder and mitigate against people coming forward to tell of their experiences at all. For males there are some very specific barriers which are discussed elsewhere in this report. These factors persist and go a long way to explain why most people are unable to report these experiences at the time or, indeed, for many years after they have taken place (if at all). The fact that so many find themselves able to come forward at all is testimony to a high degree of resolve or courage on their part for which they are to be commended not disparaged or undermined.

1.33. The Apology (Scotland) Act 2016 however explicitly removes any perceived impediment to issuing an apology as such an apology *"is not admissible as evidence of anything relevant to the determination of liability in connection with that matter, and cannot be used in any other way to the prejudice of the person by or on behalf of whom the apology was made"*.

1.34. The Independent Review had been hopeful that such acknowledgement and apology would have been made by all clubs and organisations concerned by the time of the publication of this Report.

1.35. It is to be hoped that consideration of the accounts covered in this Report will lead other clubs and organisations to similarly express an acknowledgement and apology to those affected, and, in so doing, commit to a process of improvement to ensure that the wellbeing and protection of children and young people, and the reduction of risk, are clear priorities now and in future.

RECOMMENDATION 1

The Independent Review recommends that the clubs and organisations concerned issue an unequivocal and unreserved public apology to those who have been personally directly affected by sexual abuse in Scottish football. This apology should be on behalf of the club/organisation itself as well as the wider football family.

Furthermore, clubs and organisations concerned should openly acknowledge the impact of these events on those affected and the enduring effect this has had on them (and their families) into their adult lives.

SOME OF THE PERSONAL ACCOUNTS PROVIDED TO THE REVIEW

1.36. A total of 33 people directly provided the Review with accounts of their own personal experiences of sexual abuse/alleged sexual abuse within Scottish football. All of these were male.

1.37. There are a small number of individuals who spoke to the Review about alleged abusive experiences that occurred ***outside of Scottish football*** (either in relation to football in England or in relation to another non-football institution or organisation) and these fall outside of the Terms of Reference for the purposes of the Review. Where this was the case, we have always either passed information (with the consent of the provider) to the relevant authorities or confirmed that the provider has done so personally. Indeed, the Review has gone out of its way to engage with those individuals in the same way as we would have if their circumstances were covered by the Terms of Reference of this Review.

1.38. The narratives of people who have personally experienced alleged sexual abuse in Scottish football have provided us all with the most important information from which to learn lessons and make changes. As such the Review has been able to arrive at a number of observations and findings and to form some recommendations for change as a result.

1.39. For the purposes of this Report we have provided many (but not all) of these accounts to both illustrate the basis for our observations and findings and (where appropriate) our recommendations. These have been redacted to contain only essential detail and have been edited to observe the anonymity/confidentiality of the individuals concerned. They are presented with the full permission and cooperation of the individuals who provided them. In those accounts where the identity of the individual *is* provided this is done with the explicit written permission of the person concerned. The inclusion of these also serves another vital function to help the reader understand the general circumstances and the *impact* that this had on these young people at the time and as adults. In addition to the consent and involvement of the individuals concerned the Review has further consulted directly with a number of those concerned about the wider observations and insights arrived at by the Review.

1.40. Where legal (criminal) proceedings are currently ongoing it has been necessary to omit some accounts so that such proceedings are not jeopardised or influenced.

1.41. All those referred to in this Section who committed offences against young people have been subject to proceedings which are now complete unless they were deceased at the time of allegations being made or died before proceedings could be brought or completed.

1.42. Including individual accounts in this Report is not something that is done lightly. However, it is our responsibility not only to include the “voices” of those who have been abused but to place them uppermost in our considerations. The same applies for anyone reading this report. These narratives should be at the heart of future decision making and always act to inspire and motivate change. That principle is fundamental to this Review and to our recommendations.

1.43. We do well to understand that we are involved with people’s most intimate and vulnerable stories. While many get to “walk away” at the end of the day it is vital to remember that these accounts are an important part of the lives of those affected. We all have a serious

commitment to them that we will never lose sight of the very real impact of these experience on their lives.

1.44. The following personal accounts (as provided to the Independent Review) have been presented in relation to each offender or alleged offender. Each edited and redacted personal account is preceded by a simple anonymised indicator of the role which the Review was told that the abuser/alleged abuser held and where.

1.45. The Review acknowledges that there is a difference between “hard” knowledge of someone’s abusive activities brought about by actual detailed allegations and the risk/harm it presented and *suspicion* brought about by hearsay or by witnessing situations that caused discomfort or through cumulative exposure to “low level” information. The Review however believes that suspicions should have been checked out and, as necessary, acted upon. Actual allegations by young people are not necessary when serious suspicion exists to allow an organisation, a club or an individual to act to protect young people and exercise a duty of care towards them.

1.46. Although the Review urges everyone interested or concerned to read these accounts carefully in order to fully understand the seriousness of what has occurred and the impact on those involved, it is important also to exercise some caution before doing so. ***Anyone who has experienced similar issues in their past or who has personal experience of other traumatic or distressing events should consider carefully the impact which reading these accounts may have on them. Before reading further in this chapter anyone who may be caused emotional distress or mental health problems as a result may wish to seek out professional or further personal support before deciding whether to proceed or not.***

A

A was a registered referee, a coach and a scout (simultaneously) and died in 2004.

Mr P Haynes

Note: Mr Haynes has waived anonymity for the purposes of this Report.

Mr Haynes comes from a stable and settled working class family and was born and brought up in a large town in west central Scotland. He participated in football since primary school playing regularly for teams from the age of 10 years. At secondary school he showed sufficient promise to be approached by other youth teams. It was known at the time that scouts would regularly attend youth football matches and, where they wished, make contact directly with parents and young people in respect of progressing the young player in the game.

Mr Haynes told the Review that when he was about 12 years old he was approached in the street by **A** (who was well known in the community as a registered referee with the Scottish FA). He had no idea who **A** was although it was clear to Mr Haynes that **A** recognised him as a young player, having seen him before. **A** lived in the same locality as Mr Haynes and told him that he could "open a lot of doors" in football and arrange introductions to a range of clubs.

According to Mr Haynes, **A** was the outward picture of respectability and credibility – he wore a football blazer and presented himself as if he had wide influence in the game.

A also visited Mr Haynes's parents and was able to win their confidence. Consequently, he obtained their permission for the young Mr Haynes to accompany **A** to a Cup Final in Glasgow in 1979. Mr Haynes has alleged that on the way back from the match **A** stopped

the car and sexually assaulted him, including forcing the boy to perform sexual acts on him.

According to Mr Haynes, the pattern of abuse quickly escalated thereafter and usually occurred in **A**'s home nearby. The Review was told that this occurred several times a week and included oral sexual acts and rape. Mr Haynes explained that he was unable to extricate himself from this and could tell no-one because he believed others would blame him; or stigmatise him (especially thinking he was 'gay' which was, and continues to be, considerably stigmatising for many young men in Scotland particularly in football and other sporting activity); would jeopardise his football career which was extremely important to him; and would cause him to be ridiculed and rejected by his peers. He also saw **A** as a powerful and influential figure who would always be believed before him.

As **A** lived locally, Mr Haynes often would sometimes take lengthy detours out of his way to avoid possibly crossing paths with him.

Mr Haynes told the Review that he believed a number of boys may have been similarly abused by **A** over the years, as he observed many boys leaving **A**'s home. He himself was advised by another boy to avoid **A** because he (**A**) was "weird". Mr Haynes also speculated that adults in the community may also have had suspicions given the numbers of boys visiting **A**'s home and seen in his car although he also thought any suspicions may have been dismissed because of **A**'s known profile within football.

By the age of 16 years Mr Haynes had started to play at a senior professional club but then suddenly decided to stop playing. This was mainly because of the effect that the ongoing experience of sexual abuse was having on him psychologically, emotionally and physically. He told the Review that around this time he felt able to resist any further attempts by **A** to abuse him and so the abuse stopped. In any case he felt that **A** had, by this time, "lost interest" in him as **A** would have been more interested in younger pubescent or immediately post-pubescent boys.

No attempts were made by anyone in football to establish with the young Mr Haynes why he had suddenly given up a promising career in the game.

As a teenager and as a young adult Mr Haynes lived in constant fear that he had contracted HIV/AIDS as a result of the alleged rape(s). His thinking was that the alleged abuse was somehow associated with homosexuality mainly also influenced by the publicity about AIDS in the 1980's. His anxieties about this ran high for some time afterwards.

Mr Haynes informed the Review that in the early 1990's, then in his mid-20's, he reported these events to the Police but no proceedings were taken against **A**. Mr Haynes does not know why.

The Review was told that he also directly reported his experiences to the Scottish FA in the early/mid 1990's. He was told that the Scottish FA had 'no jurisdiction' over **A** so nothing could be done. Mr Haynes does not know what was meant by this.

The Review understands that the previous Chief Executive of the Scottish FA visited Mr Haynes at his home in 2017, discussed these matters with him, acknowledged the impact of what had happened and expressed regret at what had occurred. The Review considers this approach welcome and positive and is aware that Mr Haynes viewed it similarly.

Mr Hayne's adolescent and adult life have been proliferated with difficulty including poor attainment; disruptive behaviour; drug issues; relationship problems; chaotic lifestyle; serious mental health problems and hospitalisation; difficulty making or keeping male friendships; and suicide attempt. This pattern commenced in adolescence (at the time of

the onset of sexual abuse) and is in stark contrast to a hitherto well-adjusted, settled childhood and exceptional footballing ability.

From his 30's onwards, Mr Haynes has stabilised his life, has completed a university degree and is in a stable relationship.

Who in Scottish football knew at the time?

Mr Haynes was unable to confide in anyone about what was happening therefore the Review concludes that no-one in Scottish football knew *at the time* of these allegations.

A few years later he reported his experiences to the Scottish FA and to the Police. The Review understands that the Scottish FA took no further formal action in relation to his allegations and also that there were no proceedings taken as a result of his complaint to the Police.

Young person 'Z'

Z recalled playing for two junior clubs (neither of which currently exist) when he was about 17 years old. He doesn't recall clearly how this came about but thinks he was perhaps scouted and encouraged to go along.

Z told the Review that he also played football midweek and **A** would pick him up and drive him to training and back. Z was always on his own during these times. His recollection was that **A** would touch him on the thigh and this was always in the context of a 'joke' or innuendo and Z would push his hand away. He said that this didn't happen every time **A** gave him a lift but occurred regularly. Z believes that **A** knew he "wouldn't get anywhere" with Z so he didn't push further by escalating his behaviour.

Z reported to the Review that further banter concerning **A** took place amongst young players inferring they knew of his sexual activities with young players and referring to him as "a weirdo". Z also spoke of another young player who he recalls the team being told would not be returning to training and now wonders if he too may have been a victim of sexual abuse at the time.

Z also spoke of other coaches who offered to be available to give young players transport including at times outwith football training which now makes him suspicious of their motives. He also recalled hearing that one coach and others also took young players to a house with their girlfriends where the young players were encouraged to take part in sexual activity with the girls in front of the coaches.

Z is currently still active within Scottish football and provided the Review with his views and suggestions on a number of issues which are reflected in the recommendations in this Report.

Who in Scottish football knew at the time?

Z told no-one in Scottish football of these alleged experiences therefore the Review concludes that no-one in Scottish football knew at the time.

Further information

The Review is satisfied from information received that some knowledge of **A's** (alleged) activities in Scottish football was subsequently held by the Scottish FA following a complaint made in the early/mid 1990's (some time after the events are alleged to have occurred).

The Review has no information to confirm whether the Scottish FA shared this information with the Referees Association or the Police or undertook basic inquiries as a result of that complaint.

The Review has also received a number of accounts which indicate that other young players at the time may have had, at least, suspicion of **A**'s conduct at the time. This appears to have been subject to rumour, innuendo and banter between them.

B

B worked as a scout for several professional football clubs including one senior club in Scotland and various senior clubs in England.

B died in 2017.

Mr L Stephen

Note: Mr Stephen has waived anonymity for the purposes of this Report.

Mr Stephen was brought up in a relatively deprived working-class area in a city in the north east of Scotland. At the age of 8 he started playing football and immediately showed an aptitude for the game. He played for a local boy's club. As he entered his teenage years there was substantial interest in his emerging skills from clubs around the country.

In the 1980's it was common for scouts to approach the manager of a boy's club if interested in a young player and thereafter the parent would either receive a letter from the club or the scout would directly approach the parent.

B introduced himself to Mr Stephen's mother via letter and subsequent phone calls and explained that he could offer Mr Stephen a trial for an English club for which he was acting as scout. He was told that this trial would be at a match to be held in Edinburgh and that a number of young players from across Scotland would be taking part.

Mr Stephen (then aged 14 years) told the Review that **B** suggested that he stay with him at his flat in Edinburgh. Mr Stephen believes he met **B** once prior to going to stay with him.

The Review was told that **B** met the young Mr Stephen at the station in Edinburgh and took him to his flat and the first night was uneventful. The following day Mr Stephen played in the trial match. Later back at **B**'s flat the Review as informed that he suggested that he might have something to help Mr Stephen recover from the game and massaged his legs. Mr Stephen, at that point, thought little of this.

Mr Stephen told the Review that **B** then ran a bath and told him to get in but Mr Stephen protested that the water was too hot. He also said that **B** encouraged him to get in even though the water was at an almost unendurable temperature making the boy feel faint.

Mr Stephen informed the Review that **B** then helped him out of the bath and made him lay on a bed, almost naked and exhausted by the temperature of the bath. Mr Stephen told the Review that **B** then proceeded to engage in sexual activity with him and then retired to his room. Mr Stephen says he was left unsure of what had happened and confused about his physical response during this sexual act.

It is understood that the next morning **B** mentioned nothing about what had taken place. He then took Mr Stephen to a large market on the outskirts of Edinburgh where he purchased sports clothing for him.

Mr Stephen told the Review that when they returned to **B**'s flat as soon as he got through the front door **B** tripped him up causing him to land face down on the floor. Mr Stephen alleged that **B** then attempted to rape him and, when he realised what was happening, fought him off which was difficult as **B** was a large man.

Mr Stephen told the Review he then spent the remainder of the day in a state of fear and alarm and had to have **B** constantly within sight fearful of what might happen if he turned his back on him. He had no option but to wait until it was time for him to return home as he was a young person alone in an unfamiliar city with no means of getting home independently. **B** then took him back to the station where the boy caught a train back to the north east.

On returning home Mr Stephen told his mother what had happened, but at his behest she did not tell the police because her son was convinced this would end his (promising) football career and cause him intense shame and stigma.

Mr Stephen was offered a contract with the English club and went on to have a successful career in professional football for some time. He later became aware that **B** had moved on to a scouting job with another senior English football club.

B died in November 2017 during the period of this Review and before the conclusion of criminal proceedings. It is understood that his activities are also subject to independent review in English football.

Who in Scottish football knew at the time?

The young Mr Stephen did not confide in anyone in Scottish football therefore the Review concludes that no-one in Scottish football knew of these allegations at the time.

Further information

The Review also learned that a youth football coach was increasingly aware that **B** may have posed a risk to young players and we understand that he reported this to the English clubs where **B** was acting as a scout. The Review understands that this coach also informed the Scottish FA of his concerns at the time.

The Review concludes that, as a result, it is possible that the alleged activities of **B** were suspected by some in Scottish football *at the time* including coaches in youth football in Edinburgh (who took appropriate action in reporting this to the police at the time even though there were no formal protocols in place requiring them to do so); a senior official at the Scottish FA (it remains unclear as to what action this individual took as a result of receiving this information); and a group of young players (of unknown number) across Scottish youth football at the time who appear to have had some suspicion although the Review does not know what the reasons for this may have been.

C

C was a coach at (then) Celtic Boys Club for six years and then, some years later, in a fundraising capacity for a second tenure.

Mr K Campbell

Note: Mr Campbell has waived anonymity for the purposes of this Report.

Mr Campbell joined Celtic Boy's Club when he was aged 13 (in 1986) after answering a newspaper advertisement looking to recruit players for trials. He was a devoted fan of

Celtic FC with which Celtic Boys Club had an association at the time. Both he and his family were therefore very proud when he was chosen to play for Celtic Boy's Club.

At the time, the Review understands that Celtic Boys Club engaged several coaches. Mr Campbell told the Review that soon after joining Celtic Boy's Club one of the coaches (C) began to touch him sexually. This allegedly happened in C's car and at his home. Mr Campbell alleged that three other boys were frequently sexually abused while he was present.

Mr Campbell recalled that he held C in high esteem and he was apparently very popular with all the young players. These events, the Review was told, happened "dozens of times" over a four-year period.

At first Mr Campbell was confused about what was happening. He told the Review that C gave him money and took him and other boys on trips and holidays to destinations including England. Later, when he was aged 17, Mr Campbell realised what was happening was wrong and felt guilty for accepting money and gifts from C. He became very confused about his 'relationship' with C whom he respected, which made him unable to accept what was happening to him. He even went so far as to 'defend' C against other young players claims that they too had been sexually abused by him. Mr Campbell now feels that this demonstrated the level of control C was able to exercise over the boys he is alleged to have abused.

The Review understands that Mr Campbell went on from Celtic Boy's Club to play for the Celtic FC Reserve team.

The alleged sexual abuse that Mr Campbell told the Review that he experienced at the hands of C ended in the early 1990's.

Mr Campbell's recollection was that there was favouritism shown by some coaches at Celtic Boy's Club at the time leading them to play young players off against one another, depending on their respective talent. Mr Campbell told the Review that some boys were routinely "humiliated" in front of the others and made to do menial tasks around the club. He now feels that this culture at Celtic Boy's Club made it easier for his abuser to target the more obviously 'vulnerable' young players for sexual abuse.

He told the Review that it was common knowledge amongst his peer group that C was engaged in sexual activity with young players.

The young Mr Campbell didn't tell anyone of these allegations at the time because of strong feelings of guilt and shame. These alleged experiences appear to have contributed to drug and alcohol issues and relationship problems as well as severe and ongoing mental health issues into his adult life. He has attempted suicide several times over the years.

Who in Scottish football knew at the time?

Mr Campbell was unable to confide in anyone concerning what was happening. The Review therefore concludes that no-one in Scottish football, including Celtic Boy's Club and Celtic Football Club, knew of these allegations at the time.

Young person 'Y'

Y began playing at Celtic Boys Club in 1989 at the age of 13.

We understand that one of the coaches (C) at Celtic Boy's Club asked him to help with his business at the weekends as well as running him home from training.

Y gave a general account to the Review stating that he was sexually abused by C. However sadly Y died in a tragic accident before being able to provide a detailed account in person to the Review.

However, family members and a friend have also spoken directly to the Review and given their recollections of what Y told them about his experiences. These include that he was allegedly sexually abused by C at C's place of work and in C's vehicle and that he was allegedly given money, football boots and other material gifts apparently to ensure his continuing silence concerning these incidents.

It has also been reported in the press that Y said that he was regularly sexually abused by C and if he refused to do C's bidding he would be dropped from the team.

We understand from family members that Y's father grew suspicious about C spending so much time with his son but because of Y's dream of becoming a professional footballer and the position of C to help his son he pushed his concerns to the back of his mind.

Y stopped playing football when he was 16 although the Review was told that he continued to be pursued by the coach via telephone calls. A friend of Y told the Review that, at the age of 16, Y told him of his experiences but made him promise never to speak of this again as he feared what his father's reaction might be.

Family members also told the Review that Y's behaviour and mental health deteriorated, he misused drugs and had a gambling problem, his employment prospects and close relationships were affected and that he attempted suicide on at least one occasion.

Who in Scottish football knew at the time?

The Review understands that Y did not confide in anyone in Scottish football and therefore concludes that no-one in Scottish football, including Celtic Boys Club, knew of these allegations at the time.

Further information

The Review received further information indicating that C left Celtic Boys Club as a result of some suspicion about his activities. Some years later it seems that he was permitted to return to Celtic Boys Club apparently in a fundraising capacity although the Review understands (from young players at the time) that he may also have become involved, once again, in coaching. Subsequent press reports a number of years later appear to have led to him again leaving the club.

The Review has been provided with personal accounts alleging sexual abuse by C during his second tenure at the Celtic Boys Club.

The Review concludes, from the accounts received that it is possible that a number of people in Scottish football may have had some *suspicion* regarding C's alleged activities at the time including former managers at Celtic Boy's Club; a former senior manager and a former Board Member at Celtic FC at the time; and a group of young players at Celtic Boy's Club (of unknown number).

The Review concludes that when the first suspicions arose as a result of allegations some appropriate action was taken by Celtic Boy's Club. However, the Review is unable to confirm whether this matter was reported to the authorities at the time.

The Review finds it concerning that C was permitted to return to Celtic Boy's Club in another capacity after only a few years.

D

D was a coach at a youth football club in Edinburgh (now no longer in existence) and at Hutchison Vale Football Club. He was later employed as a youth coach at Hibernian FC and as a scout at another senior professional club. He subsequently held the position of Head of Youth Development and youth coach at Rangers FC.

He died in 2014.

Mr J Cleland

Mr Cleland has waived his anonymity for the purposes of this Report.

Mr Cleland joined Hutchison Vale (Youth) Football Club in the early 1980's when he was aged 10. Additionally, **D**, a coach at Hutchison Vale at the time, set up another 'club' as an extension of footballing activity. The club effectively acted as a 'youth club' offering snooker, pool and table tennis during the evenings to young players who were, according to Mr Cleland, singled out by **D**. It was also used as the basis for boys being chosen to be taken or encouraged to go for weekends away to venues in rural Perthshire with other boys. Mr Cleland told the Review that **D** was always the only adult taking care of the boys during these trips.

The Review was told that, during the trips away, **D** told ghost stories, woke the boys suddenly in the middle of the night, and took them out for woodland walks apparently in an effort to frighten them. Mr Cleland told the Review that stunts were used such as 'floating lights' and **D** would suddenly reappear claiming to have been "fighting with ghosts" and appearing dishevelled [as a result].

Mr Cleland informed the Review that on one occasion, when he was aged 10, **D** removed his shorts and pants and spanked him for a minor misdemeanour such as getting his clothes wet. Mr Cleland also told the Review that, on another occasion a short time later, **D** took him to a back room at the football club, removed the young Mr Cleland's clothing under a pretext of treating an injury then allegedly raped him. Mr Cleland was aged 10 at the time.

The Review was told that **D** also took Mr Cleland away on his own, under the pretext that he required a massage for an injury and took him to the treatment room at the club house where the young Mr Cleland was then sexually assaulted or raped. Mr Cleland also told the Review that **D** sexually assaulted him in **D**'s car.

By the time Mr Cleland was a young teenager (around the age of 12 years), he was playing for Hutchison Vale and had also signed for Hibernian FC's Youth Team. He also alleges that, in a room at both Hibernian FC Stadium and at their training ground at Riccarton, he was raped by **D**.

Mr Cleland alleged to the Review that he was raped by **D** on between 8 and 10 occasions in addition to being sexually assaulted or abused on numerous other occasions. This is said to have occurred over a period of 18 months and ended when Mr Cleland suddenly stopped playing football due to his inability to deal with the abuse any longer. At this time, he was also playing for the national youth squad as well as at Hibernian FC. The Review understands that no officials of either organisation made any approach to Mr Cleland subsequently to try to determine why he had decided to quit football so abruptly.

Mr Cleland did not speak out about the alleged abuse as he was initially unsure what was happening to him (he was aged 10 years) and thought that he was being punished for doing something wrong on the football field. When he realised later that this was wrong, he felt embarrassed and ashamed and also wanted to protect his parents who were keen for him to pursue a career in football. Because he gave up football his potential as a

player was never realised. The Review was told that no-one in Scottish football contacted Mr Cleland to enquire as to his reasons for discontinuing his football activity even though he had been an exceptional player who had represented Scotland at under 15's level.

Mr Cleland has suffered from depression throughout his life since and has difficulty sleeping. His experiences and the trauma brought about have had a considerable impact on his close relationships particularly with his parents and wife. He told us that his parents now experience immense guilt for sending him to the club and a strong sense of betrayal as they considered **D** a friend of the family.

Who in Scottish football knew at the time?

Mr Cleland was unable to confide in anyone in Scottish football. The Review therefore concludes that no-one in Scottish football, including Hutchison Vale FC and Hibernian FC, knew of these allegations at the time.

Young person X

X was a keen footballer who was being monitored by a host of Senior Clubs even as young as 13 years of age.

An opportunity arose and in early 1990 when he was aged 13 he joined Rangers FC. Initially he played in his age group but was soon invited to train with the age group a year senior to him.

X told the Review that one evening at training at Ibrox Stadium he was instructed by a coach to go and see another coach (**D**) in his office. **D** was the team coach in the squad X was currently playing for as well as being Head of Youth Development at the club (therefore having an office in Ibrox Stadium).

X informed the Review that when he arrived at **D**'s Office, he was accused of smoking and drinking at the weekends. He was told by **D** that the club had received a call from an unidentified third-party reporting this.

X told the Review that **D** then offered him three options: - to never play for Rangers FC again; for **D** to inform X's parents; or to "sort it out **D**'s way".

X was desperate to play for the Club and he did not wish his parents to find out so he asked what option 3 was. X said that **D** told him that they could go through to the en-suite bathroom of his office where **D** would spank him.

X told the Review that he felt compelled to go with this option and went with **D** to the en-suite bathroom where he alleges that he was told to take down his tracksuit bottoms and pants which he did. X told the Review that he was then instructed to lie across **D**'s knees which he said he also did. He told the Review that he felt **D** raise his hand but the blow never came. X told the Review that **D** then told him to get out of the office and get ready for training.

X later confided in his parents about this event. His parents then contacted members of the Management Team at Rangers FC who confronted **D** who was immediately dismissed from the Club.

The Club have since said publicly that this matter was reported to the Police at the time however the Independent Review is unable to confirm whether a formal report was made.

X returned to Rangers FC the following week. However, the Review was told that the repercussions of his allegations continued for him at the club. This mainly included a coach openly threatening that whoever had "grassed" his friend and "got him the sack" had

better “watch his back” as he would “make his life hell”. The Review is concerned that, even following the dismissal of **D** from the Club, a colleague of **D** was able to intimidate young players (including X) as if to enforce their continued silence about any possible experiences which rightly should have been reported and dealt with.

X told his parents of this but the family decided not to complain in case this might mean that X would be seen as a troublemaker. X soon after left the club and went on to play for another senior club youth team in Scotland. The Review was told that no-one at Rangers FC attempted to establish why X had decided to leave the club.

His promising career in professional football was thereafter cut short because of a serious injury.

Who in Scottish football knew at the time?

X told his parents at the time. His father then went on to inform senior managers at Rangers FC about what had allegedly taken place and appropriate action was taken to remove **D** from the club. In turn other coaches at the club appear also to have been informed of **D**'s dismissal and that this was due to a complaint from a young player.

Young person W

W participated in football from an early age and it was clear that he had some talent in the game.

When he was aged 10 he played at Rangers FC.

W alleged to the Review that one evening before training, when he was aged 11, he was in the home team changing room and was told by a coach to go and see another coach (**D**) in his office. **D** was at the time the Head of Youth Development at Rangers FC and had an office inside Ibrox Stadium.

When W arrived at **D**'s office he said he was told by **D** that he was carrying an injury. W felt this was reasonable as he was carrying a slight injury and his form had dipped as a result. W informed the Review that **D** told him to remove his shorts and lie on the physiotherapy table within the office. It is not clear why someone who was not a qualified physiotherapist or indeed employed to carry out physiotherapy was permitted to have a physiotherapy table in his office.

W alleged to the Review that **D** started rubbing the upper area of W's thigh and he advised W that he had a hip and groin issue and that he would “get to the root of the problem”.

W told the Review that he recalls digital penetration taking place. As an 11-year-old, W did not know what was happening but he knew that it did not feel right.

W states from that moment onwards he lost all motivation and passion in respect of playing football. He was also very bright academically but after this incident his schoolwork suffered.

W did not tell anyone about the incident as he felt ashamed, was worried about how his parents would react and that his opportunity to play football at a high level would be adversely affected.

W has not told the Review of any further incidents involving **D** but thought that **D** and the rest of the coaches side-lined him the following season.

Following the alleged incident, W recalls that he started gambling and subsequently developed a gambling addiction. In addition, he feels that he developed mental health problems and his studies also suffered at that time.

W has found it very difficult to form and maintain intimate relationships throughout his life and he has intermittently had a gambling addiction, mainly as he sees this as a 'coping mechanism'.

W remains troubled by his experiences and has self-harmed and attempted suicide on three occasions.

Who in Scottish football knew at the time?

W was unable to confide in anyone in Scottish football. The Review therefore concludes that no-one in Scottish football, including at Rangers FC, knew of these allegations at the time.

Young person V

V played football as a boy and trained with Rangers FC from aged 11 to 16. At 16 years of age, he went on to play with another senior club then left football aged 19 to pursue another career but continued to participate in football until he was aged 25 when injury and other changes in his life lead to him stopping playing.

When he was at Rangers FC, V told the Review that he had different coaches.

On one training night when he was aged about 12 years V told the Review that he injured his back. Two other boys in his team also had injuries at that time. He informed the Review that he was told that D (a coach at the time) was acting to coach the team and said he would need to examine him. V recalls that D asked his father if he could examine V. V said that his father thought this unusual as it didn't appear that D had asked the same of the parents of the other two boys.

V told the Review that he was taken to D's room in Ibrox Stadium where he said that he was told by D that this lower back injury required to be treated 'internally'. V reports that D told him to lie on his front and take his pants down. He alleged that he was told by D that treatment meant applying an anti-inflammatory gel which D then put on his fingers and digitally penetrated V.

V alleged that as he turned his head round he saw that D had his trousers open at the front and was touching his own penis.

V told the Review that D then told V to pull up his pants and V then left the room. He said that D said nothing further to him.

V said that at that age he didn't know much about what was expected and thought that this must be the right thing but was uncomfortable enough about the incident that if he was told that D had to 'treat' him again V would have refused.

V told no-one of this incident until contacted by the Police when he gave a statement. V's father still does not know of this incident and V is insistent that he should not know. V's contact with D after the alleged incident was minimal. He said he saw him around the Club and occasionally D would have coached his team but this didn't involve any individual contact with him.

V also recalled a bus journey to play a tournament when he said a young player made jokes about D and his sexual activities with boys. V said this further triggered his own memory of what happened to him but also would have acted as a further disincentive to ever disclosing what had happened for fear of being thought of as gay.

V told the Review that the incident has not dominated his life but is significant for him to remember it every time a report or discussion of this sort of issue arises.

Who in Scottish football knew of V's experience at the time?

V did not confide in anyone in Scottish football therefore the Review concludes that no-one in Scottish football, including Rangers FC, knew about this allegation at the time.

Young person U

U was brought up in Edinburgh where he participated in football from an early age. He played for a Boy's Club in the west of the city as well as at a community football club which is no longer in existence.

U told the Review that at the age of about 12 or 13 years of age when he was at a local social club (where the club held training) along with other young players he was playing a game of snooker. He told us that he had been fooling around and had accidentally broken a window with a snooker ball.

U told the Review that, as a consequence, he was told to stay behind after training to speak with **D** who was a coach at the club regarding the broken window.

When he did so U informed the Review that **D** told him he had three options. One was to be put out of the football club; another was for his parents to be told and for them to pay for the damage; and the final option was to be spanked. U told the Review that he did not want his parents to find out and wanted to continue playing football so chose the third option.

He alleged that he was then taken to a room upstairs in the social club where he was told to take down his pants and further alleged that he was spanked by **D** on the bare buttocks about 12 times with a rubber gym shoe. U remained at the club for a period of time but had no real interaction with **D** again.

He did not confide in anyone at the time or subsequently and is not aware of anything happening to other young players at the club.

U gave a number of suggestions to the Review for improvement and these are reflected in the recommendations in the remainder of this Report.

Did anyone in Scottish football know of this incident at the time?

U did not confide in anyone so the Review concludes that no-one in Scottish football knew of this allegation at the time.

Further information

It is understood from accounts provided to the Review that Hibernian FC received allegations from some parents concerning **D** and that this coincided with an approach from Rangers FC to employ his services. Hibernian FC were unable to confirm to the Review whether allegations were received or not and, if they were, whether they were acted upon and there is no other supporting information about any action that may have been taken if this was the case. The Review is therefore left to conclude that either a) no allegations were received or b) they were received by Hibernian FC but no further action was taken. There is no supporting information available to the Review to suggest that **D** was dismissed by Hibernian FC before taking up a post at Rangers FC but that **D** was permitted to leave the club to take up a post at Rangers as head of youth development/youth coach following an approach from Rangers FC.

If information was available to Hibernian FC concerning his behaviour or activities in respect of young players at the time of **D**'s move from there to Rangers FC then there is no information available to the Review to confirm whether this information was passed to Rangers FC. Four years later, following a report that **D** attempted to engage in a sexual act with a young player, the Review confirmed that senior managers at Rangers FC dismissed **D** immediately.

Recently the Review has learned that an article was published in The Ranger News magazine in March 1991 (some months after his dismissal) in which the Club extended its thanks and warm wishes to **D** for his future. The reason given in this article for **D**'s sudden departure from the Club was that he had left to pursue personal business interests elsewhere. The Review did not learn of this article by those currently at Rangers FC although it is very likely that they were not aware of this article's existence. No mention was made of the article by the previous senior managers who had dealt with the incident and who contributed directly to the Review, but it is likely that the time elapsed made them unable to recall it. However, the Review considers the publication of this article as ill-judged.

It is not known what further activity within football **D** pursued following his dismissal from Rangers FC although the Review have received some unconfirmed reports that he was able to act as a 'freelance' football coach thereafter.

The Review also concludes that it is possible that a number of people in Scottish football had cause for suspicion about **D**'s alleged activities at the time.

These include former senior staff and board members at Hibernian FC who may have received allegations from parents soon before **D** left the club to work at Rangers FC (there is no substantive information available to the Review to confirm this). The Review is unable to confirm that, if such allegations had been received, Rangers FC were informed of these.

Two former senior managers at Rangers FC were apparently provided with a direct allegation (from the parents of X) concerning **D**, took the allegations seriously and followed this with reasonable steps to deal promptly with the allegations reported to them. This action was commendable. However, the Review is unable to confirm whether this was formally reported to the investigating authorities.

Young players themselves also appear to have shared innuendo and banter concerning **D** and his alleged activities.

E

The Review understands that **E** was assistant coach at a youth team and a coach in both junior and youth football clubs and subsequently as a scout and as a kitman with three senior professional clubs.

Young person T

T played football for his local youth team. When he was aged 14 in 1982/3 the Manager of a nearby Junior Football Team (**E**) joined the coaching staff.

T was encouraged by **E** to attend his Junior Team games and T was offered a lift on the team minibus.

Because T lived the furthest afield, he was always the first to be picked up and the last to be dropped off after matches. T told the Review that **E** would insist in taking the back

roads home on the pretext of avoiding the Police because he had usually consumed “a couple of pints” of beer. T told the Review that E stopped in secluded areas on the trip home and subjected T to various sexual assaults and that this continued for about a year.

While on a trip abroad when the team was competing in a tournament, T told the Review that E spoke in a sexualised manner to the boys and engaged in sexualised behaviour in the communal shower setting. The Review was told that on one occasion he grabbed a young player and smeared boot polish in the area of his genitals.

T told the Review that eventually the alleged sexual abuse stopped and T now believes that this was because E became interested in another youth player and shifted his attentions to him instead.

T felt relief that the abuse stopped but told us he feels guilt that he was unable to stop the other young person from probably being similarly abused.

T said that he did not speak out about the abuse as he initially was unsure what was happening to him and he was confused. He started drinking heavily as a teenager and developed a gambling addiction. It is evident that the effects of this on him have also led to damaged relationships as he continued to deal with the enormous problems caused by binge drinking and gambling some 30 years later.

T told the Review that as a boy he played at a very high standard but he became disinterested in football. His studies at school were also negatively affected.

T informed the Review that he would have liked to have gone into football coaching but was concerned that people might assume that because he was subjected to sexual abuse himself, that this would mean people thinking he too has sexual motives for getting involved in coaching children.

T said that he had always believed that he was the only one who was abused until recently when he told the Review he felt a sense of “relief” when he found out that this was not the case.

Who in Scottish football knew at the time?

T was unable to confide in anyone concerning his experiences at the time. The Review therefore concludes that no-one in Scottish football knew of T’s allegations at the time.

Young person S

S was brought up in a town in west central Scotland and played football since the age of 7 for a Boys Club *which is now no longer in existence*. The club was very successful and played to a high level, entering every Cup competition in Scotland with the exception of the Scottish Cup.

E joined the Boy’s Club as an assistant coach when S was playing for the under-14’s. Due to E’s contacts there were regular trips to Wembley and overseas football trips to Belgium.

It was during a trip to England and Belgium in 1973 that S states he first noticed E’s inappropriate behaviour to some of the boys. He recalls E waking the boys up by shaking them and alleged he would sometimes grab their genitals. S told the Review that E would also watch the boys in the shower room and grab them but E suggested that this was all done in jest.

S told the Review that E often singled S out for praise leaving him feeling ‘different’ from the other team members.

On the trip back up from London, S told the Review that E pinned him to the window of the bus and was warned that he shouldn't move on to another Club (S recalls that he had no intention of doing this). S believes that his intention was to have S join the part of the boys club that he led (the older age group). Concerned about the possibility of S moving on was further examined by the then coach who called S's home to discuss E's false claims.

Soon after, the coach left the Boy's Club leaving E to take over as Head Coach.

S told the Review that one night before a major game, he and another young player were invited to stay overnight with E. S was told to stay in a bedroom next to the living room while the other boy was to sleep upstairs.

S told the Review that during the night E got into bed with him but S reacted, threatening E with a glass vase which was in the room. Thereafter E left the bedroom. S then sat on the bed awake from the very early hours until morning.

After this incident S told us that E visited his parents. S's view now is that E's "manipulative skills were second to none – he was masterful with parents".

E apparently told S's parents that, when staying with him before the senior game, S had 'had a strop'. S recalled feeling 'sick to his stomach' to see E saying this while sitting in his home with his parents. S told the Review that, during the visit, while his parents were out of earshot, E whispered to him "I won't tell your parents you're gay" which S saw as a deliberate way of ensuring that S did not tell his parents of what had allegedly taken place.

S told us that E played on S's parents poor financial circumstances - buying football boots and training gear etc for him. He recalls his mother getting "quite emotional" at E's 'generosity'. S told the Review that E also garnered further favour with S's parents by saying that he had connections with a major senior club in Glasgow which was very significant because his father was a passionate supporter of that club. E also told S's parents that S may be a "real prospect" but may miss out due to his 'attitude'. Indeed, E introduced S to a legendary ex-player and arranged for the boys to walk out onto the pitch at the club's stadium further impressing S's parents.

On reflection S is convinced that this was all part of a concerted strategy to silence S from telling his parents.

S also recalled that when playing a game after a particularly cold day E would rub the legs of boys in front of the rest of the team.

S told the Review that he also noticed changes in other, 'mild-mannered' young players including one 'exceptional player' who left the club with no warning.

S also spoke to the Review about others who he knew had committed suicide as adults and his belief that their suicides had been a direct result of sexual abuse.

S spoke of changes in his mood and behaviour after the alleged incident with E. He feels that this seriously affected his youth and his education.

Later in life S told the Review that he had seen E at a football match and E had attempted to approach him but S ignored him.

S spent the next 42 years without telling anyone of what had happened to him. S has made several suggestions for improvement to the Review and these are reflected in the recommendations of this report.

Who in Scottish football knew at the time?

S did not confide in anyone in football at the time. The Review therefore concludes that no-one in Scottish football, including at the Boy's Club (now no longer operating) knew of these allegations at the time or subsequently. However, it is possible that other young players had suspicions or knew of E's alleged activities and this may also indicate that other adults in the game had similar suspicions.

Young person R

The Review has relied on members of R's family to provide information concerning his allegations and reports of sexual abuse by E since R himself died in 2013.

R lived with his parents in a small town in east central Scotland.

The Review was told that R played football for Fauldhouse United FC a junior football club where E was a coach. He also played for Armadale Thistle FC another a junior football club where E was also a manager.

R went on to play for a senior professional football club in Scotland.

His ability also attracted interest from senior English clubs. He eventually gave up football after suffering a groin injury in 1991.

E had been known to R from the community and was also well known to R's family.

It was reported to the Review that the first time R was allegedly sexually abused by E was during an away trip to Austria and Germany.

It is not known to the Review the extent of the sexual abuse that is alleged to have happened.

The Review understands that R told no-one in Scottish football of what had happened either at the time or subsequently.

In adult life R suffered from depression for years and developed a serious alcohol related problem.

He was admitted to a psychiatric hospital for a short period and it is believed that he also continued to self-harm.

Following his death in 2013 his widow reported this to the press who published a story about R.

Who in Scottish football knew at the time?

R apparently did not confide in anyone concerning his alleged experiences until many years later. The Review therefore concludes that no-one in Scottish football, including at Fauldhouse United FC and at Armadale Thistle FC, knew about these allegations at the time.

Young Person L

L grew up in a small town in east central Scotland.

At the age of 15 L and a friend were approached to play for Fauldhouse Juniors FC a Junior Football Club by E who was a coach with the team. Both boys loved football and joined Fauldhouse Juniors.

L told the Review that at every training session or game E would try and touch boys when they were showering and rub soap into their genitals. This was always in the context of 'banter' and was laughed off by all the boys present. L told the Review that E made various sexual comments to the boys and there was always sexual innuendo including between the boys themselves. L informed the Review that he felt uncomfortable but everyone else seemed to think it was just a bit of fun so he didn't say or do anything.

L said that he remembered a football trip to Austria when the squad stopped off in London. He said that he was made to go through an "initiation ceremony" which involved being stripped naked by E in front of other boys and another coach. L further alleged that E proceeded to smear toothpaste and boot polish onto his naked body and genitals while the other coach laughed in the background. L told the Review that he was terrified but just wanted it to be over with as he knew other boys had been made to go through the same thing.

The Review was told that a few of the young players including L were invited to work at E's shop at a fruit market. L alleges that during these occasions E would also try and grab the boy's genitals and recalled that there was a room at the back of the shop which he thought was the ideal place to isolate the boys.

L further spoke to the Review about an occasion where his close friend who was also allegedly subject to this unwanted behaviour by E tried to tell him that E's behaviour had escalated further with him and was more serious than what they experienced in the showers. L told the Review that he was unprepared for this and did not know how to respond and so brushed this off and changed the subject. L now feels considerable guilt that he did not listen to his friend more closely as he believes that he suffered more prolonged and serious alleged sexual abuse at the hands of E which L believes ultimately contributed to his premature death as an adult.

A short time after this L left the club and eventually moved out of the country. He did not tell anyone of the abuse at the time.

Did anyone in Scottish football know at the time?

L did not confide in anyone therefore the Review concludes that no-one in Scottish football, including at Fauldhouse Juniors, knew of these allegations at the time.

Another coach was said to be present during the initiation which L has said he experienced and therefore it appears that this individual possibly knew and possibly colluded with this behaviour. This individual has recently been convicted of sexual offences related to his time as a coach.

Further information

The Review understands that E left Celtic FC (where he was apparently employed as a kitman) when the managers and Board at Celtic FC became aware of allegations concerning his activity in a previous club. Press reports of the time indicate that Celtic FC undertook an internal investigation as a result. If this was the case, then the Review considers this highly appropriate however the Review has been unable to confirm this information.

E's departure from Celtic FC feature in press reports from the time. Despite this being widely reported he was apparently then able to secure employment at Hibernian FC as a kitman and thereafter the Review understands he was at Falkirk FC in the same capacity until his retirement. (Hibernian FC and Falkirk FC have confirmed to the Review that they have no existing records pertaining to his employment although Falkirk have confirmed verbally that he was employed there. There is also existing film footage of him working at Hibernian FC).

In the opinion of the Review it is possible that differing levels of suspicion were held by a number of people in football including a number of young players at a youth football club

who it is understood witnessed, on a number of occasions, sexualised activities with boys; and former senior staff at Celtic FC (**E** left the club at that point and the Review understands that this was as a result of action being taken internally by the Club).

The Review is concerned that **E** was able, apparently, to secure employment at two senior clubs (Hibernian FC and Falkirk FC) following reports of his alleged activities already having appeared in the national press. It is the view of the Review that due diligence should have been exercised in recruitment and appointment at the time although it is recognised that disclosure processes at that time were either initially not in place at Hibernian FC or neither club could use such processes because the work to which **E** was being appointed did not fall within the scope of disclosure checking. Even so, it seems probable that reports would have reached both clubs concerning **E**'s alleged past conduct because these had appeared in the national press and may have been common knowledge within Scottish football as a result.

G

The Review understands that **G** was a physiotherapist at Motherwell FC, Hamilton Academicals FC and Partick Thistle FC and also provided his services to other youth football clubs on a freelance basis. He died in 1995.

Young person P

P became devoted to football through his grandfather who ran a local team and told the Review he became an outstanding prospect as a young player.

In 1988, at 13 years of age, **P** developed a condition that required physiotherapy. His family approached an acquaintance who was known to be a Physiotherapist (**G**).

P told the Review that he was initially taken to Firhill Stadium where **G** was employed as a physio for his first treatment session but was told that his condition would require further physio over the coming weeks and months. **P** recalls that **G** refused to accept payment for his services which the family saw as a huge gesture of kindness.

P informed the Review that in future visits for treatment at Firhill Stadium he was taken there by his mother who was then told by **G** that he insisted that he would give **P** a lift home following the treatment.

P told the Review that the alleged abuse started during his second treatment and was in the form of sexualised touching and alleges that this subsequently progressed to rape.

P told the Review that he did not want to tell family members as he felt deeply ashamed and worried and said that **G** had been buying him material goods such as football equipment and clothing and electronic equipment.

P also told the Review that in addition, **G** suggested that he could use influence to get **P** a trial at Partick Thistle FC which he then went on to do.

P was subsequently signed by Partick Thistle FC at age 14.

P told the Review that, on many occasions, **G** provided transportation to **P** and he told the Review that the alleged sexual abuse continued both within **G**'s vehicle, within the treatment room at Firhill Stadium and at the home address of **G**.

P informed the Review that he remained at Partick Thistle for about 18 months until he could no longer endure the sexual abuse to which he says he was being subjected. Even when he moved onto another non-professional club, **P** suffered from panic attacks that

led to him being hospitalised on 4 separate occasions and he is convinced that this was linked to the abuse which he says he had experienced.

P stopped playing football at age 18 after suffering a serious injury.

Almost 30 years afterwards P still experiences chronic mental health problems and has attempted suicide. He told us he has serious problems with trust in intimate and personal relationships usually leading to the breakdown of those relationships.

With his own children, P told us he very reluctant to allow 'sleep-overs' by friends as he does not want to put himself in any situation where he may be accused of acting inappropriately.

Although P now holds down a responsible job he remains badly affected by his abuse. He has confided in a previous partner and close friends but, despite having contributed to this Review and to the criminal investigation, has not spoken of this to his mother who is still alive.

Who in Scottish football knew at the time?

P was unable to confide in anyone at the time about what had happened. The Review therefore concludes that no-one in Scottish football, including at Partick Thistle FC, knew of these allegations at the time.

Young person O

O was raised in as part of a working-class family in the west of Scotland.

His school did not have a football team. He started to play with Pollok United Junives, a local youth team when he was 9 years of age. He continued to play for Pollok United Junives from the age of 9 and went on to play with their under 21's squad.

O was offered a trial with a senior professional club when he was aged 16 but this trial was put in doubt due to him suffering a training injury to his ankle. O then had an appointment for treatment with G who was then engaged as a physiotherapist in senior professional football and working freelance with other clubs. The appointment was held in the stadium of a local Junior Football Club. O recalls another player being there for treatment before him and once this player had left O was alone in the clubhouse building with G.

O told the Review that G asked him to get onto a treatment table. O said he became slightly concerned that G was treating him from the other side of the table which meant that G had to lean across and touch the left side of O's thigh area to access his right leg. O alleges that he then felt G's hand inside his shorts. O told us he then 'froze' for a short time.

O said he immediately slid off the table, got dressed quickly and went to the door but found that it was locked. Slightly panicked, he told the Review that he ordered G to unlock the door which he did. O left the clubhouse and walked home, telling no one about the incident.

O told the Review that he later signed for the Club where G was employed as a physiotherapist but he never ever saw him there.

Because he was only part time at the club, O said he felt like a bit of an outsider at the club and that he never quite fitted in. He said he didn't involve himself with dressing room banter but recalled G's name was once mentioned in conversation when another young player made a joke which inferred that G was known for his sexual activity with young players at the club.

Until recently O has been unable to tell anyone of his experience.

In adult life O has struggled with stress, anxiety and depression and said that his life had been a 'roller coaster' since his abuse. This also included serious 'trust issues' in relationships.

He remains very reticent in speaking about all matters relating to sex or sexual abuse. O told the Review that he felt that his personality changed from the day of the incident and has also attempted suicide.

The incident has left him feeling very angry and distrustful.

O has been in receipt of counselling services.

Who in Scottish football knew at the time?

O was unable to confide in anyone about what had taken place so consequently no-one in Scottish football, including Pollock United Junives, knew of this allegation at the time.

Further information

Although Partick Thistle FC have confirmed with the Review that they have no 'formal' record of either G's employment or allegations, the Review notes that G apparently left Partick Thistle FC after allegations were made by the parents of a young player concerning inappropriate behaviour. An ex-senior player at Partick Thistle FC told the Review that he recalls that the first team were told of G's departure from the club at the time and the nature of the allegations. The Review has been unable to confirm whether any information was passed to the police at the time in respect of the allegations.

The Review concludes that it is possible that a number of people in Scottish football had *suspicion* concerning G's alleged activities at the time. These include former senior staff at Motherwell FC who recall two separate sets of allegations made by parents regarding G's inappropriate behaviour towards their sons for which he was dismissed or asked to resign (the Review understands from information received that, in at least one of these situations, the police were not informed. The Review also received information that Motherwell FC conducted an internal enquiry in relation to one of these situations and a decision was taken jointly by the board and the parents *not* to inform the authorities at the time); former senior staff at Partick Thistle FC; (former) senior players at Partick Thistle FC; and an honorary office bearer at the Scottish FA.

The Review is also aware that a number of parents similarly may have had degrees of suspicion at the time concerning the alleged activities of G.

The Review recognises and commends Motherwell FC for taking this situation seriously enough subsequently to undertake its own internal enquiry in 2016 and this has been extremely useful to the Review in helping piece this information together.

The Motherwell FC enquiry also suggests that Hamilton Academical FC were informed of the allegations by Motherwell FC and the Scottish FA as G was also employed at Hamilton Academical FC at the time. The Review has been unable to confirm this with Hamilton Academical FC although another contributor to the Review recalls G was employed on a *freelance* basis by the club to treat injured players.

The Review is unable to confirm whether the allegations which came to light at Partick Thistle FC were reported to the investigating authorities.

Similarly, the Review understands that there may have been a decision at Motherwell FC not to inform the authorities on one occasion. Furthermore, the Review is unable to confirm

whether information was passed to Hamilton Academical FC or, if this was the case, what action was taken as a result.

J

The Review understands that **J** was a scout and coach.

J had died by the time allegations of sexual abuse were reported in 2016.

Mr D Manson

Mr Manson has waived anonymity for the purposes of this Report.

Mr Manson was born and raised in the west of Scotland and was part of a large family eventually being brought up in care.

He told the Review he was always regarded as a good football player.

As a young player a friend put him in contact with a coach/scout (**J**) who told him that a local boys club (no longer in existence) was looking for young players. Mr Manson then went to play at the boy's club for one season. **J** then allegedly told Mr Manson that he wanted to take some pictures of him wearing the strip of the senior club with ties to the boy's club. It was arranged for Mr Manson to go to **J**'s home and he alleges he was told to undress and put on the football strip. He told the Review that when he was doing **J** started to rub himself against him.

Initially, Mr Manson said he felt a bit obliged (to comply) when it was 'just' touching because **J** was also giving him money and material things. However, this allegedly subsequently escalated when Mr Manson spent a night at **J**'s home where he states that **J** raped him. Mr Manson told the Review that, on the last occasion, he was at **J**'s home and recalled **J** being in the bath while he waited in the bedroom for him. **J** allegedly told Mr Manson to come in to the bathroom and then invited him to dry him which he did. Mr Manson told the Review that **J** then started to touch him and he became distressed and asked him to stop. Mr Manson said that he eventually ran out of the house to escape the situation.

Thereafter the young Mr Manson tried to avoid going to **J**'s house and would often then have to turn up late for training. He told the Review that on one occasion when he returned to **J**'s house he recalled **J** pinning him to the wall and hurting him and he then ran out of the house crying.

Mr Manson told the Review that he remembers **J** making promises about his potential career in football and how he could help him with this.

Mr Manson never told anyone what had taken place except later when he told a good friend who took him to his father's house for about a week. Mr Manson then returned to sleeping rough before moving to England.

Mr Manson has had troubled mental health in adult life including thoughts of and several attempts of suicide. On one occasion he has been referred to a psychiatric unit for assessment and treatment. At the age of 15 he suffered from a stomach ulcer and his relationships have also suffered considerably as he went through adult life.

Mr Manson has also made suggestions for improvement in football which are reflected elsewhere in the recommendations in this Report.

Who in Scottish football knew at the time?

Mr Manson did not confide in anyone in Scottish football at the time or subsequently and therefore the Review concludes that no-one in Scottish football knew of these allegations at the time.

H

H was fixture secretary at Forres Mechanics FC.

Young person N

N joined Forres Mechanics in 1979 aged 14 after showing promise in the school football team and progressing through national school trials.

Soon after joining the club a staff member (**H**) - who N at the time understood was a Director - began to show a great interest in N's progress and would offer him advice on his game. He also apparently befriended N's parents and grandfather and visited the family and socialised with them. N later learned that **H** was the fixture secretary at the club.

N told the Review that **H** was always in the changing room and showers with the players (including the First Team and the Under 21's) before and after games. N alleged that **H** put his arm around N and touched his knee before touching him on his private parts through his clothing. N alleged that this always happened when the other players were present. He told the Review that he initially thought this must be a mistake but when **H** kept repeating this behaviour, N realised that it was intentional. He further alleged that **H** also watched the players when they were having showers. According to **N** he also gave him brown envelopes containing money over a period of time and N was never sure what the money was for. He has also recalled that there was 'banter' about **H** from the other young players suggesting that this was behaviour he had exhibited before.

N told the Review that this happened frequently over a period of time. He has also reported to the Review that, on one occasion, after playing in a summer league game at the local park he was making his way home and met **H** who was sitting on a bench. **H** told the Review that **H** told N to sit down and then touched him on the knee. N then stood up fearing that this would escalate and felt vulnerable as no-one else was around. N told the Review that **H** then pulled down N's shorts and underwear but he was able to get away from **H** and run home where he told his parents what happened. N's father had some difficulty accepting N's story as he thought well of **H**. While his parents were deciding what to do **H** apparently turned up at the family home but N's parents would not let him in. N assumed that his parents had reported this to the club but it has since transpired that this was not the case nor was a complaint made to the police.

Later N returned to the club where he states that **H** told him that no-one would believe him and people will say he was lying. Eventually N felt he had no option but to leave and join another club.

He approached the Club Manager and advised him that he did not wish to play for the team. The Manager appears to have accepted this but did not ask why.

N told the Review that he put this out of his mind for many years but more recently felt a need to report this. He said this was difficult to do, as he had not thought about it for many years. Despite this he felt that he was able to move on and has had a successful life with strong relationships and a good career.

Who in Scottish Football knew at the time?

N told no-one else other than his parents who did not make a complaint to Forres Mechanics. The Review therefore concludes that no-one in Scottish football, including at Forres Mechanics, knew of these allegations at the time.

Additional accounts

Since the publication of the Interim Report of the Independent Review in June 2018 people affected by non-recent sexual abuse in Scottish Football have continued to come forward to tell the Review of their experiences.

Two of these accounts contained particularly serious and important information but, since these are now in the hands of the investigating authorities, the Review is unable to provide this information publicly. However, among the allegations made the contributors provided information concerning possible organised sexual abuse and sexual exploitation. This included allegations concerning the introduction of young players between adult men for sexual purposes across borders under the guise of football activity. This information may indicate the possibility of organised sexual abuse of young players. The contributors concerned have also been referred to the Independent Review set up by the English FA which should also take account of this information in its deliberations. This Review is indebted to these contributors for providing us with accounts of their experiences.

The broader issue of *Organised Sexual Abuse and Sexual Exploitation* is dealt with elsewhere in this report.

WHO IN SCOTTISH FOOTBALL KNEW OF THESE MATTERS AT THE TIME (OR SUBSEQUENTLY)?

1.47. The Independent Review was asked to look into “*what if anything the Scottish FA and/or any of its members and/or affiliated and/or associated organisations knew in relation to these matters at the relevant time and what action did and should/could have taken place at that time*”. (Terms of Reference 2017).

1.48. This means identifying *what knowledge* we can reasonably determine was held or shared; *what level of knowledge* this might have been; *who held this knowledge* or information leading to concern; and *what was done* as a result.

1.49. Since the Review was required to focus on what was apparently known about these allegations in the Scottish FA and in Scottish football at the time (and who knew what) it should be understood that, because this is a retrospective task, the Review has had to piece together a range of information – mostly from those directly affected and from those who were active in the relevant football clubs at the time – in order to make some sense of what was known and by whom.

1.50. “Corporate memory” in the clubs/organisations affected is almost non-existent in respect of these matters. Most of the current staff and officials at these bodies were not there at the time when the alleged events occurred. Some clubs have changed hands since and are now run as successor companies.

1.51. The Review has not been able to access any written records from clubs which might confirm (or otherwise) information provided from other sources. This is, as we have been told by the Clubs concerned, because records have either been destroyed or cannot be traced. Consequently, the Review has therefore been constrained and has depended on the accounts of those affected; accounts of those who are ex-players, ex-managers, ex-coaches and ex-officials; accounts of a few current managers and officials who were around in the club at the

time of the alleged events; and open source research to piece together a picture sufficient to answer the questions set by the Terms of Reference for the Independent Review.

1.52. This is not a forensic task and we have not reached conclusions to the same level of proof required and established by criminal inquiries. Since our objective is to establish answers to the three questions set by the Terms of Reference and identify lessons from what is said to have happened, we have considered information and reached our conclusions “on the balance of probability” accepting that a degree of informed speculation has also been required to make sense of things and derive learning.

1.53. To answer the questions asked within the Terms of Reference, the Review has relied primarily on the personal accounts of those who were abused. We have also, where possible, triangulated this with accounts from family members and from others who were around in the clubs and organisations concerned at the time (coaches and senior managers in particular). This has been further supported with open source research and information from others who have had access to relevant information such as journalists.

1.54. As noted above most of the young people who experienced sexual abuse in Scottish football **did not** report it to anyone else at the time. Many did not do so until very recently (from 2016 onwards) once the issue entered into the public arena largely through the commendable efforts of some individuals who had been abused and investigative journalists.

1.55. The Review concludes therefore that *in the majority of situations reported to the Review* no-one in Scottish football ‘knew’ in the sense that they had been in possession of concrete information concerning actual allegations or incidents or witnessed events such as to confirm that sexual abuse was taking place at that time or had recently taken place.

1.56. But this does not necessarily mean that there was no *level of suspicion* among some in Scottish football. Indeed, the Review concludes that there may have been variable degrees of suspicion about individuals on the part of people involved in the game, and some of these suspicions ran high. Suspicion and certainty are of course two quite different things. But our interest lies in what steps were taken by those responsible for football at the time who may have known or suspected sexual abuse or exploitation in order to properly protect young people as a result.

1.57. Only three of the personal accounts given to the Review refer to young players having told someone else immediately after an alleged incident of sexual abuse. In all three cases the young person told a parent.

1.58. In one case, the contributor, then aged 14, told his mother the day following the second alleged incident. The contributor implored his mother not to report it or tell anyone else and so these events were not known until more recently when he came forward to speak to the media, to Police Scotland and to the Independent Review. Therefore, it is our conclusion that no-one else (other than the contributor and his mother) knew of these alleged incidents at the time and that no-one in Scottish football was aware of what is said to have happened. However, this is not to say that no-one in Scottish football had *suspicions* about the alleged abuser and his activities. Indeed, it is our conclusion that some may have a level of suspicion (sometimes quite high) about what this man may have been doing in relation to boys in his charge.

1.59. In another account given to the Review the contributor (then aged 13) told a parent shortly after the alleged incident. This resulted in his parent informing two senior managers at the club concerned. These two senior managers took the matter seriously enough to confront

the youth coach concerned. When no satisfactory explanation was provided the two senior managers acted promptly to dismiss the alleged abuser.

More recently the club has advised that a report was made to the police at the time although the Review is unable to confirm this. As far as this account is concerned the Review concludes that, at the time, the only people in Scottish football who knew of this incident were two senior managers and the operations executive at the club. However the Review understands that previous information which may have been in the hands of personnel at another football club and would indicate a high level of suspicion at that Club yet the Review cannot confirm that these concerns were passed on when the coach involved moved to another senior club shortly following these concerns apparently coming to light.

1.60. In only one other account provided to the Review the contributor reported to the Police and to the Scottish FA about 12 years after the onset of the alleged abuse and some 10 years after it stopped. The (alleged) abuser was a registered referee in Scottish football but his involvement with the contributor centred on his apparent role as a scout offering the youngster a trial for an amateur football club. (Another contributor – playing for an amateur club and a professional club at age 17 in the mid-1990's - also provided an account alleging attempted sexual abuse by this individual which occurred after the previous allegations had been reported to the Scottish FA).

In respect of the allegations made by the contributor to the Police in the early 1990's the Review was told that a decision was made that the allegations could not be proceeded to criminal prosecution. The apparent decision not to proceed was a considerable disappointment to the contributor.

He then approached the Scottish FA (in the early/mid 1990's) to report what allegedly had happened to him as a young player. He told the Review that he met with the then CEO of the Scottish FA and explained the alleged serious abuse that he had experienced over a prolonged period. The Review was told that he apparently was informed that nothing could be done as the alleged abuser (A) was outwith the jurisdiction of the Scottish FA. (Referees were not subject to discipline by the Scottish FA but by the Referees Association of which they were a member). Nevertheless, the Review concludes that the Scottish FA could have done more to pursue this information than was apparently the case by making further enquiry, passing information on to the Referees Association and to the investigating authorities, or directing the contributor to the appropriate route for lodging a complaint (with the relevant referees association). The Review was made aware that the alleged abuser was still active in Scottish football at that point and subsequently as a coach (the account of another contributor relates to alleged incidents that took place a couple of years after the Scottish FA had been informed).

Even at a time when protocols for reporting were not in place and procedures and policies did not exist, the Review does not consider this sufficient reason for inaction given the seriousness and type of information provided at that time. A process of due diligence could have been carried out by the Scottish FA to establish the alleged abuser's status within football and to take steps to gather further information to address risks and concerns.

1.61. In one further account considered by the Review and provided by a parent of the young player involved the allegations of abuse were reported *at the time*. This young woman reported sexual abuse by a coach directly to the team captain. Two coaches from her team then visited her and her mother to learn more and then advised the parent to report the matter immediately to the police. This was done. The coach was then prosecuted and received a two-year custodial sentence. This took place in relatively recent years and seems, from the way it was handled, to be a reflection of a level of good practice at the girl's club. However, this situation is not without its concerns. The sexual abuse she experienced has contributed to

considerable impact on the girl herself and she has been challenged by ongoing mental health issues and attempts of suicide since.

The Review has other residual concerns arising from this case. The Review has considered information concerning the mutual relationship between the local senior club and the girl's club at the time. This is largely because the parent has expressed serious concerns that the senior club allegedly took legal steps to stop it being named as the criminal case was coming to court and the case was being heard. The parent concerned wondered why this may have been the case but was not able to ascertain any further information on this or the circumstances from the club concerned. The connection between community football teams and local senior clubs was a matter of interest to the Review and has featured in a number of situations brought to our attention. The Review considers this elsewhere in this Report.

1.62. In all other accounts provided to the Review the contributor did not tell anyone at or near the time.

“In Plain Sight” – perpetrator behaviour.

1.63. One of the issues that frequently concerns the public and, no doubt, will concern those in Scottish football, is how individual adults are able to perpetrate acts of sexual harm on children and young people without detection and, sometimes, with the (often) unwitting enablement of others. Indeed, this is an issue that should rightly concern society because without addressing it head on we will be unable to focus our attention on how to *prevent* sexual abuse from occurring in the first place.

1.64. The Review received accounts containing distressing information about the experiences of individual young people in Scottish football across many years. The Review, and many who have contributed, are of the view that it is important for the Scottish public to have some understanding of the behaviours concerned and how particular adults were able to ‘navigate’ their way in Scottish football behaving as they did sometimes without challenge and frequently without being brought to account.

1.65. In the following section of this report we provide some observations and information regarding particular issues that have arisen from the accounts given, especially as to how they affected young people at the time and often prevented them from disclosing their experiences to others.

1.66. The ‘flip side’ of this important information is that there also needs to be a degree of understanding as to *what* adults have done in order to assess its complexity, its seriousness and to appreciate the enduring effects this would have on individual young people. Indeed, such an understanding is an essential component of determining how we can take measures to make Scottish football (and Scottish society) safer.

1.67. The roles which those adults held included football coach; football scout; football referee; club official; and physiotherapist. It is clear therefore that, when it comes to the exposure of young people to adults in positions of authority in football, this covers a diverse range of situations and roles in which abusive or exploitative behaviour may occur. The Review does not believe that there are risks inherent in people who normally occupy these roles and again reiterates that abusive behaviour is the responsibility of the individual perpetrator concerned. However, it would also be misguided if we did not attend to the ways in which adult roles in football are managed, how they are deployed and the context in which they are undertaken to ensure that those who occupy these roles do so in ways that are not harmful to the wellbeing or safety of children and young people.

1.68. Within these roles the Review has heard much about the harmful behaviour of certain adults. These behaviours need to be understood if we are to prevent them from occurring again and blighting the lives of current or future young players.

1.69. In particular the range of behaviours which have arisen include:

- *The administration of alcohol* to bring about levels of intoxication in young people making desensitisation and abuse easier to accomplish.
- *Extreme methods and the use of force* to overcome, overpower and carry out sexual assault.
- *The provision of material goods* as both an enticement and as a 'reward'. This featured as part of a desensitisation process ('grooming') and as a way of maintaining the 'complicity' and silence of young people.
- *Favouritism*. In a sporting context this has particular resonance where young people are made distinct from their team-mates through special status, 'rewarded' with extra attention and support, and shown greater approval and affirmation by a trusted adult.
- *The use of places of residence, vehicles, hotels, swimming pools, treatment rooms, showers, places of employment etc.* as sites where sexual abuse (often repeated and serious) could be perpetrated. These sites are not all private domains. Sometimes both desensitisation and abusive behaviour were undertaken in plain sight of others including other young players and adults. In these circumstances it was not only *what* was done that is concerning but *how* it was done (i.e. that some acts were carried out under the guise of rough-housing, playfulness or ribaldry or other behaviours believed, at face value, to be "innocent"). Similarly, concern should be given to the use of both private spaces or club accommodation which was *rendered private* so that sexual abuse could be committed.
- *The use of physical chastisement* as a precursor to serious sexual assault and sexual abuse. In these circumstances the Review regards the use of physical chastisement as part of a continuum of harmful (abusive) sexual behaviour on the part of the adult(s) concerned.
- *The use of "physical examination" and physiotherapy treatment* as a means of creating the possibility for sexual abuse and as a desensitiser. Such "examinations' were often conducted in private spaces by people who were neither employed nor qualified to do so. At the time this was considered a normal part of the conduct of youth football. The Review also received other accounts concerning physiotherapy and its clinical practice. Where this was delivered "freelance" it meant sometimes that treatment was applied in places of residence or in hotels. The Review assumes that this practice is now no longer permissible. Even so, the use of discreet treatment facilities in pavilions and stadia were also sites where sexual abuse occurred. This intensifies the need to ensure that all practitioners using such facilities are properly qualified, registered and regulated.
- *The use of games to disorientate, excite and frighten young people*. The Review takes the view that these were also often part of an arousal pattern for the adult concerned.
- *Rough play*. This was often conducted in full view and with the participation of more than one young person at a time. In this way desensitisation and arousal could occur disguised as something which might have had the assent and involvement of others.
- *Excessive and harsh physical training*. Once again, the Review understands that coaching practices and regimes have changed over the years and the key positive elements of good coaching are now soundly embedded. Nevertheless, for a coach who had a predisposition to abuse power, a coaching regime that permitted (if not required) the use of harsh treatment and excessive training provided an essential cover and backdrop. Indeed, where there was a sexual interest in young players such practices apparently contributed to arousal patterns, created an atmosphere of domination and fear and rendered young players much less likely to speak up. Such treatment included immersing young players in freezing cold water and refusing them permission to surface

until the adult said so; forcing young players to undertake such rigorous and relentless training that some vomited etc.

- *Hazing*. This is dealt with elsewhere in this report, but the Review has been concerned about the past use of initiation practices with and among boys engaged in team activity. Hazing normalises humiliation, ridicule and risks emotional, physical and sexual harm to some or all members of a team or group. It does not depend on a young person's "willingness" to participate. It is essentially about power and control and does not create "unity". To this end the examples provided to the Review were frequently part of a pattern of arousal for an adult and became also a means of "tying" young people into harmful activity perpetrated against them. The façade of bonding made it less likely for young people to complain or resist or even comprehend what was taking place.
- *Threats and intimidation*. Occasionally, in the accounts provided to the Review, these were explicit and direct. However, on other occasions these were veiled and subtle and delivered in ways intended to make it clear to young people that attempts to disclose or resist would mean very serious consequences for the young person with their club, their team mates, their peers, and their families.
- *Sexualised language*. This is often a central feature of male bonding and certainly a 'normal' feature of adolescent development. However, in the accounts provided to the Review such language on the part of adults was sometimes part of a process of desensitisation and of "sexualising" the environment and onward interactions. Because this was not particularly obvious to young people or, indeed, to other adults it was 'hidden' amongst established group practices and within the regular behaviour of many adults. Sometimes this took the form of banter encouraged by certain adults among young players and through which those adults derived a further sense of arousal and 'encouragement'.
- *Relationships between adults with a sexual interest in children and young people* (particularly pubescent and post pubescent boys). It is evident to the Review that there has been some limited connection between adults with such interests and who used football as an activity through which to meet their common interests.
- *Embracing young players in a sexualised way* including touches to their buttocks and fleeting touches to private parts. Often this was done in plain sight. In some accounts provided to the Review the young player(s) were naked after showering or in changing rooms.
- *Sexual touching* of (adult) senior players on pitch, or while "treating" injuries, and the use of sexually explicit language directed personally.

1.70. The range of acts of sexual abuse reported to the Review included sexual touching and language; digital penetration; masturbation; encouraged and forced/coerced mutual masturbation; oral sexual activity; sexualised corporal chastisement; frottage; exhibitionism; and rape.

1.71. These behaviours were directed at and these acts perpetrated on young people between the ages of 6 years and 16 years of age.

1.72. However, the Review has been struck by how easy it was for these adults (with a sexual interest in children and young people) to navigate Scottish football in such a way as to make their activities accomplishable and to maximise secrecy and concealment. In a sport where (at that time) many people involved either knew (or knew of) each other such adults were able to manipulate personal relationships and connections to maximise opportunity and reduce the chances of detection. Similarly, they appear to have used 'good standing', status and influence to access young players and consequently to reduce the possibility that any accusations or, indeed, suspicions would be taken seriously. This is as much dependent on a disposition towards positive bias on the part of other adults as it is on the machinations of the abuser/alleged abuser himself. Indeed, where some action was taken to remove an adult

suspected of sexual abuse there were occasions where it seems that the same adult was able to be re-admitted to a club some time later. One can only speculate as to what made this possible but one should be highly alert to how expert some adults (with a sexual interest in young people) can be at manipulating and grooming other adults (as well as children) and insinuating themselves into favour even when concerns have come to light previously. This observation cannot be stressed strongly enough.

Omissions and a “duty of care”

1.73. The Terms of Reference required the Review to address *“what if anything the Scottish FA and/or any of its members and/or affiliated and/or associated organisations knew in relation to these matters at the relevant time and what action did and should/could have taken place at that time”*.

1.74. From the accounts provided to the Review it is evident that there were a number of omissions which occurred in relation to matters that were either known or suspected at the time. In some instances, the grounds for “suspicion” at times appear to have been compelling.

1.75. The Review is aware that, in determining what these omissions were, it would be convenient only to use, as a yardstick, the standards and protocols of today in relation to child sexual abuse and its occurrence on sport or in Scottish football. However, the Review takes the view that, even although arrangements and responses to allegations or suspicions of child sexual abuse were very different during the time concerned (compared to today), there was still a clear *duty of care* to children and young people which was well understood across Scottish society at that time. Indeed, there are a few instances cited in this report where individuals and clubs did take appropriate action (albeit sometimes incomplete) possibly demonstrating that their appreciation of a duty of care, if at times rudimentary, was present and contributed to their decisions and actions.

1.76. However, in other circumstances considered by the Review and the accounts which described them, there were sometimes flaws in decision-making and omissions in the actions which were taken. Regrettably sometimes this meant that little or no action was taken at all. On other occasions it seems that the actions that were taken did not take full account of the implications for young people beyond the club or organisation (and sometimes within it) so were incomplete.

1.77. The main omissions which the Review has identified were:-

- not sharing information with relevant parties within football
- not formally reporting concerns, suspicions or allegations to the investigating authorities
- not conducting due diligence in the appointment, re-appointment, or continued engagement of particular individuals to roles or positions in a club or organisation
- not anticipating or assessing risk in relation to the participation of young people in football activity particularly in respect of trips away, travel arrangements (to and from training, matches etc.)

1.78. The Review accepts that general knowledge and practices were markedly different during the period of concern than they are now. This meant that football (like many other aspects of life involving children and young people) had not, at that time, put in place a robust regime and arrangements to protect young people that nowadays would be expected. However, in individual instances where allegations were made, information received, or concerns identified a proportionate but effective response should have occurred whether or not formal protocols or policies were in place. This was sometimes not the case. Decisions on

many such matters are made by individuals and, although perhaps informed by heightened awareness, largely depend on common sense. This was as much the case then as it is now.

1.79. The Review however has also had to consider what people, at that time, would have considered “knowledge”. It is perfectly possible that some people would have not considered “unease”, or “concerns”, or “suspicion” or other indicators as a reason to make formal decisions or to take prompt action. Indeed, this “threshold’ is an issue which influences individual responses even today and the Review urges that this issue is explicitly addressed in all training and information provided as well as procedures and policies which are put in place.

1.80. Similarly, it is possible that, much like institutional responses today, individuals are conflicted (when it comes to making decisions or taking action) between their considerations for their organisation and “doing the right thing”. It may well have been a factor that people played down concerns, or in some other way found reasons *not* to take decisions/action (or not to complete actions) by considering the consequences for themselves or their organisation if they were subsequently deemed to have “over reacted”, or “gotten it wrong” or “upset the applecart”. Sometimes “reputational” risk to an organisation is also an influential factor. These are as much challenges to individuals responding to concerns about child sexual abuse today as they were during the period of interest to the Review. Improved systems and policies alone do not address them. These require attitudinal, behavioural and cultural changes ones that are, for all that, of great importance to the future wellbeing and protection of young people and the reduction of risk.

1.81. It is further important to recognise the impact of *relationships* on determining how risk was perceived or understood and therefore what decisions were made (or not made) or actions taken (or not taken). The Review has no reason to suggest anything particularly sinister in this (with the exception of the limited number of situations where it appears that ‘organised abuse’ may have been a factor). When people know each other and where people have credibility, or popularity, or influence, or power, it makes it less easy for others to see them in a negative light or to accept that they may be doing things that are unpalatable or repugnant (especially when it may concern harming young people). Additionally, at a time when children and young people were viewed very differently, and when the idea of sexual harm to boys and young men was generally one which was not recognised or confronted, the preconditions for inaction became greater.

1.82. Nevertheless it is the view of the Review that, in relation to all of the omissions cited, had information been shared; had reports been made to the police; had certain individuals been removed from their roles in football or not re-admitted; and had some more rigorous arrangements been in place for the planning and conduct of trips and travel (for example) then the incidence of sexual abuse which we now know occurred may have been significantly reduced. The Review is also minded that this also may well have reduced ongoing risk to young people *outside* of football as well as those participating in it.

1.83. The Review therefore concludes that information (where it was not shared) *should* have been shared within football in respect of matters of concern or suspicion or as a result of allegations made; that due diligence *should* have been conducted in relation to the appointment of individuals to roles and posts directly involving close contact with children and young people; where allegations were received at a club or organisation to suggest that an individual had committed a crime in respect of a child or presented a possible risk to young people, a formal report *should* have been made to the police and records kept as a result; that where an individual had previously left a club or organisation because of previous allegations, concerns or suspicions held by that club/organisation, he *should not* have been subsequently re-engaged at that club or organisation or at any other club or organisation within Scottish football; and that individual adults (especially those who were subject of pre-existing concerns,

suspicious or allegations) *should not* have been permitted to undertake or lead (whether alone or accompanied by other adults) trips away or undertake the unaccompanied transport of young people to and from training or fixtures and *should not* have been permitted to use unsupervised spaces for contact with young people.

1.84. The Terms of Reference have not required the Review to address explicitly whether or not individuals, clubs or organisations in Scottish football adequately pursued a duty of care to young people as a result of these omissions but recognises that these may be relevant considerations to be addressed elsewhere.

ISSUES

Silencing

1.85. In relation to the issue of “non-recent” allegations of sexual abuse it is often asked why young people do not report these serious issues and experiences at the time. The Review considers it important therefore to reflect on why young people found it difficult or impossible to report these incidents at the time and on what those who abused/are alleged to have abused did to prevent their activities being reported. These reflections are as a result of the accounts and information received by the Review and the experiences of those directly affected.

“There’s no way I would have wanted anyone to know what was happening.....if people found out football was over for me.... I thought that life wouldn’t be worth living” (Contributor – then aged 14)

1.86. Most of the individuals who experienced abuse and who contributed to the Review told us that they were unable during the period of the abuse to tell anyone what was happening to them. This is unsurprising as it is not only a very common feature of what occurred within Scottish football but of how sexual abuse is experienced in *any* setting. Most people who are sexually abused as children or young people do not report this immediately or even soon after. Many do not speak of these events until much later in life and some never reveal their experiences. Most child sexual abuse (including in Scottish football) occurs within relationships of trust and responsibility whether in families, in care settings or in the community. This itself acts as a barrier to young people revealing their experiences in addition to the shame, guilt, self-recrimination, confusion and stigma which are common factors resulting from sexual abuse.

1.87. In the situations considered by the Review all of this was relevant and most of the contributors shouldered very real concerns which prevented them from speaking to anyone at the time or subsequently about what had happened. In our view there are many still who have not come forward. The possible consequences for teenage boys of these experiences becoming known are, for them, unimaginable and this was even more so in the 1970’s, 80’s and 90’s (although it is unlikely that very much has changed in this respect since).

1.88. It must be understood that for young people not to report such experiences at the time does not imply in any way that they are ‘ok’ with it; that these experiences are not serious; or that people who report much later are somehow ‘exaggerating’ or ‘fantasising’. In the opinion of the Review this represents an egregious viewpoint which contributes to a culture that effectively silences further those who have been personally affected by sexual abuse.

1.89. The effective silencing of ‘victims’ is essential for sexual abuse to take place or to continue. It is a real and very concerning observation that the factors that essentially have silenced these boys are not only those put in place by the (alleged) abuser. Some of these

factors occur because of cultural, societal or systemic issues which create pressures, obstacles, detriments and disincentives for young people to disclose or report their experiences to anyone at the time. Indeed, these factors endure effectively silencing them into adulthood and sometimes permanently.

1.90. However, from the accounts given to the Review it is clear that the abusers/alleged abusers went to some lengths to ensure their actions were not reported by exercising pressure on the young men concerned. In most instances they simply conducted themselves with such hubris and entitlement as to utterly diminish the confidence of these young men leading to their conclusion that reporting the events would either not be believed or would only lead to extremely negative outcomes for the young man himself.

1.91. This factor alone seriously influenced the understanding of most of these young men of the possible options open to them in relation to what was happening. The most common implication was that the status of the (alleged) abuser, acting in an official capacity within football, would likely lead to him being believed over the word of a teenage boy. This is an issue of *power*.

1.92. Even if one of these young men had decided he wanted to tell someone it is difficult to see who that person might have been and, furthermore it is more than likely that this would lead to negative consequences for the boy himself.

1.93. It is a matter of dismay to the Review that the issue of 'belief' still resonated within the current experiences of those affected. Some people told the Review that it had been inferred to them even quite recently – and often quite directly – that they have been making up accounts in order to obtain compensation etc. It is the view of the Independent Review that this attempt to undermine their credibility and disregard the impact they have endured is unacceptable and constitutes a serious wrong. The Review hopes that some of the recommendations we have made will contribute to greater confidence on the part of people in football to directly and unequivocally challenge such suggestions and the misinformation and assumptions that underpin them.

1.94. It is of note that many of these young men were further deterred by their own understandable and probably correct presumption at the time that a promising career in football might be sacrificed if he reported his experiences of sexual abuse at the hands of someone with power and influence in the game. This was a significant factor in almost all the circumstances cited above and indeed in almost all of the personal accounts given to the Review. The issue of 'sacrifice' is one which again has featured regularly in the accounts given to this Review. The sacrifices that young people make to improve and succeed in any sport something which has been raised during our consultation with young players as part of this Review. But the perception, at the time, of many young people who experienced sexual abuse in Scottish football was that if they told anyone about this that their football careers would have been over. It is our conclusion that this assumption was probably accurate.

1.95. This is further reinforced by the established credibility and influence (power) of the abuser. Because of this these young men understood that reporting would mean they would almost certainly not be able to play again. For some it was a stark choice between enduring the abuse and remaining silent or sacrificing their participation and possible success in an activity that dominated their life, their positive sense of self, and their sense of purpose. This is an unimaginable choice for any young person.

1.96. Three people who contributed to the Review with personal accounts told someone immediately following or soon after an experience of sexual abuse.

1.97. One contributor, for example, told his mother the day following the alleged event. But he also was convinced that if this was to be reported on or became more widely known there would be a range of negative consequences for him including probably not being able to continue with his football career, serious stigma and perhaps not being believed. Because of this he implored his mother not to do anything further.

Another contributor told his father who then directly went to the management at the football club concerned resulting in them confronting the (alleged) abuser and dismissing him. However, knowledge of this apparently went no further and so the alleged abuser may have been able to continue elsewhere in football in some capacity. Both of these contributors, as far as we know, did not experience repeated incidents of alleged sexual abuse and this, plus their own resilience and their relationship with their parent, may have influenced their capacity to tell immediately following the incident of abuse.

It is of concern that one of these contributors eventually felt compelled to leave the Club because a coach had made direct and open reference to the team of a young player causing his colleague to lose his job and making it clear that this coach would make life difficult for the young player if he found out who it was. This was done in front of the team including the contributor himself. The Review believes that, if it occurred, it would have likely have had the effect of potentially silencing other young players and stop them coming forward in future as well as directly leading to the contributor feeling that he could not continue safely playing with that club. It is understood that this coach continues to be active within Scottish football which causes some concern since such actions, and the attitudes that inform them, are detrimental to the protection and wellbeing of young people. If loyalties between adults have contributed to a culture of risk to young people, it is vital that those who are now responsible for Scottish football do everything they can to eliminate this influence from today's game.

1.98. Furthermore, many of the individuals who contributed to the Review reported that their experiences of alleged sexual abuse went on over a period of time and were repeated. The assumption that young people are somehow complicit where they experience repeat incidents of sexual abuse is common and perhaps still underlies a lot of widespread assumptions about the experiences of those (especially young people) who are sexually abused. Young people are well aware of this assumption and factor it into their decision or otherwise to tell someone. The conclusion of some people is that, if young people are repeatedly abused over a period of time and don't report it, they are therefore somehow complicit in the continuation of that abuse, that they invite it or that they somehow benefit from it. For these people the question arises that the young person has somehow knowingly and regularly exposed themselves to risk without taking steps to avoid abuse or to put a stop to it thus displacing responsibility onto the young person rather than the perpetrator.

1.99. The Review received some information concerning alleged organised sexual abuse and sexual exploitation of a young player (and possibly more) across borders in the early 1980's. Effectively this suggests that young player(s) were transported under the auspices of football for the purposes of sexual abuse by adult men individually and in a group. For legal reasons the Review cannot give further detail of this. In such circumstances it should not require explanation why any young person would find it difficult or impossible to voluntarily reveal these experiences. It is perfectly likely that their veracity would have been doubted and the shame which would ensue would be multiplied. Given the power and influence (perceived or otherwise) of the men involved the young person concerned would have felt well into his adult life the burden of this and what revelation might mean for his personal, family and professional life.

1.100. Where the abuse experienced was repeated and serious the Review anticipates that many people will question why a teenage boy would not speak up about this at the time. The

disincentives for young people to disclose these experiences at the time greatly outweigh any factor which might lead them to do so even when the abuse they have experienced has been systematic and extremely traumatic.

1.101. The view that delay in reporting creates dubiety about these matters has been, in the opinion of the Review, a persistent faultline in public understanding and in effective prevention of sexual abuse and exploitation for many years. It largely disregards the abuse of power which is central to the issue of child sexual abuse (and indeed adult sexual assault and domestic abuse) which effectively holds ‘victims’ responsible rather than those who perpetrate abuse. It also overlooks the complex factors at play which deter young people from reporting or even discussing sexually abusive experiences. Young people are not repeatedly abused because they want it to take place but because they cannot identify (by themselves for themselves) effective strategies to end it without considerable negative consequences falling on them (even though they are not responsible in any way for the abuse which is being carried out). It has been evident from the contributions to this Review that young people in the midst of sexual abuse weigh up these issues for themselves most often without any support or access to the right information. It is little wonder that many then, and now, still decide not to report their experiences at the time.

1.102. The message needs to be constantly repeated that *young people are not responsible for abuse which they experience*. That responsibility lies with the people who abuse them. It is therefore evident that prevention of sexual abuse should at least in part, if not substantially, focus on the thinking and behaviour of the perpetrators since it is that which needs to change in order for abuse to stop. Young people themselves should not be made to carry the burden of responsibility for sexual abuse or its repetition in the way that these young men were made to feel.

1.103. For many who engaged with the Review this issue was a clear and active consideration even though, at a young age, they would not have been able to unpick or understand it clearly.

Stigma

“I already felt different from all my pals because of what he did people finding out would have made it a million times worse. But now when I look back I think how could anyone else have thought worse of me than I did of myself?” (Contributor – then aged 15)

1.104. At the time of these events (across three decades and beyond) it was, and to a considerable extent is, the case that a hyper-masculine and homophobic culture dominated the game at all levels. For teenage boys this was a real and active factor in how sexual abuse is construed by them and in their inability to tell anyone. Indeed, this has been almost universal in the experiences described to the Review. For example, in one account the alleged abuser visited the home of the young player and whispered to the boy that he wouldn’t tell his parents he is gay (the young man was not gay). This had the effect of creating fear and anxiety on the part of the young man which only further reinforced his resolve to remain silent.

1.105. The perception at the time of a significant number of those who spoke to the Review was that same sex sexual abuse was somehow a facet of homosexual orientation or behaviour. In other words, at that time and in their early teenage years they believed (as probably did a large section of the population at that time) that men who abuse boys do so because they are gay. The corollary of this therefore is that, if others know of this, they will assume that the young man himself may have been complicit in what was happening to him and therefore himself may be gay. This is a complex issue but one which needs to be understood properly if we are to empower and support young men and to prevent sexual abuse especially in a sport dominated by men and by preoccupations about masculinity.

1.106. A number of contributors told the Review that, at the time, they feared the stigma of being thought of as gay. As adults, most now understand clearly that same sex sexual abuse is not “caused” by homosexuality any more than opposite sex sexual abuse is “caused” by heterosexuality. But as a young adolescent this was not so clear to them.

1.107. A number of people who have made allegations of sexual abuse spoke of banter within the sport most of it homophobic which only further escalated their anxieties and fears and contributed significantly to their decision not to tell anyone. It is the view of the Independent Review that the extent to which homophobic banter between peers and by adults in football reinforced fears of disclosing these experiences is considerable. Such banter and language not only therefore reflect a wider culture of homophobia within the game but actively contributes to silencing men and boys – whether about experiences of sexual abuse (which is the main area of concern to this Review) or any experience or personal issue that the young man believes will be construed as ‘weak’ or not meeting the ‘norms’ of masculinity often so forcefully imposed by those engaged in sport.

1.108. Unfortunately, this also includes experiences of mental health problems and, in the lifetime of this Review, we have been well aware of situations where footballers today have been stigmatised and ridiculed because they have revealed personal experiences of mental ill-health. Indeed, recently we have, in Scotland, witnessed behaviour by supporters and players that reinforces the stigma of mental health problems and significantly acts as a deterrent to people to openly discuss personal mental health issues or difficulties. This falls well short of the standards of solidarity and acceptance we would expect in Scottish society, in Scottish football and, indeed in in sport in Scotland and needs urgently to be addressed and remedied. It is self-evident that successful teams (of whatever age or gender) should be cohesive bodies and that such cohesion is based on inclusion, mutual solidarity and interpersonal support. The Review hopes that football along with other sports will find ways of contributing constructively to the improvement of the mental health of everyone in Scottish society and forcefully challenging stereotypes and negative attitudes from whatever quarter. Sport has much to contribute to improving the mental health of our nation and this responsibility needs to be taken seriously at all levels.

1.109. For teenage boys their peers are their primary reference group and, to a very considerable extent, this is reinforced in team sporting activity where such bonds are actively developed. The consequence of this is that winning and keeping the approval of peers (as well as adults) becomes of critical importance. Any attribute, factor or information which might undermine or put this at risk is self-suppressed and behaviour which reinforces such approval takes centre stage. It is easy to see then why contrived bravado is often a feature of the interactions of teenage boys but this becomes magnified when they might be confronting situations or feelings which they think might render them isolated from or rejected by the group. In other words, they *over-compensate* in order to dispel doubts among their peers and to reassert their conformity to the perceived norms of the group. This often takes the shape of homophobic or sexualised banter, or hyper-masculine acting-out.

1.110. It is clear to the Review that this occurred frequently in the experience of many of those who were sexually abused and only strengthened their sense that they would be stigmatised or rejected by their peers should their experiences be revealed and become known.

1.111. The sense of shame and repulsion that many contributors have experienced as a result of what took place has been overwhelming. For a number this has manifested as desperately low self-esteem, self-loathing, doubts, fear of intimacy, depression, and anxiety. Accompanied by confusion about their own thoughts and feelings this has also cut many off from seeking help since asking for help (an enormous challenge in itself for many men) might require or lead to them revealing what has happened.

1.112. Such was the level of intensity for many that they would have (and to an extent still do) find it extremely difficult to put into words these experiences and the feelings they have carried over the years.

RECOMMENDATION 2

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

The Review recommends that the Children and Young Peoples Protection and Wellbeing team at the Scottish FA work closely with the Diversity and Inclusion Manager to develop and deliver effective joint strategies, approaches, materials and interventions to combat homophobia in Scottish football. This should be done as both a vital contribution to improving equalities and participation in football and also to bring about the cultural and organisational change necessary for young players safety encouraging them to be open about personal challenges or issues of concern including risk of sexual harm.

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

Update since the Interim Recommendations of June 2018

The Review understands that the Scottish FA will launch a Football v Homophobia Strategy in partnership with Leap Sports in early 2020. A promotion campaign will be undertaken encouraging clubs to sign up and providing resources to help implement good practice.

The Scottish FA is exploring the establishment of a working group to take forward planning in a coordinated manner under the Strategy, which will include representation from Diversity & Inclusion within the Scottish FA as well as its Wellbeing & Protection Department.

The Review understands that some Clubs have established "LGBTI" wings of their supporters' associations and, once established, the Scottish FA working group will explore the establishment of a LGBTI Tartan Army supporters' group. The Scottish FA has taken part in the Stonewall Rainbow Laces campaign in 2019 and will do so again in autumn 2020.

The Scottish FA is also developing a discrimination reporting procedure which will also be launched in 2020.

Awareness of wider sexual abuse

1.113. The banter experienced by many of those who have made allegations of sexual abuse and which contributed to many staying silent also included indications from others (peers and adults) that, at some level, they too were aware of the activities of the (alleged) abusers.

1.114. For example, this manifested in indirect inferences and, such as for one contributor, on one occasion contained a direct warning to him about the alleged abuser and his apparent sexual interest in young boys (which was made after the contributor himself had allegedly started to be abused). This was further reinforced observations of numbers of boys emerging from the alleged abuser's home or being in his car.

1.115. For another contributor this has had very serious implications. His clear understanding at the time and especially subsequently was that other boys were also possibly being sexually abused. This was based on his observations of his alleged abuser with other boys and the number of boys with whom this man sought out individual contact or time. The contributor developed a very strong sense of guilt about his feeling that he was unable to stop the possibility that other boys may be being abused in the same way he said he was. It is unimaginable the degree to which young people experience a range of seriously problematic emotions as a result of what happens to them but especially an essentially misplaced sense of guilt or responsibility for what an adult may be doing to other young people. The Review reiterates that young people should not be made to shoulder the burden of the responsibility for sexual abuse nor, indeed, for the protection of other young people. That responsibility lies primarily with adults.

1.116. The Review is also aware of at least one situation when a boy tried to tell a peer of his alleged experiences but his friend clearly found it difficult to cope with what was being told or pursue this conversation which effectively ended the young player's attempt to share his experiences at the time.

1.117. We do not know how many boys were in similar situations to the young men cited above, unable to speak out and rendered powerless to stop the occurrence of the sexual abuse they were experiencing but we are quite certain that there were many. We can also only speculate as to how many people in the local community as well as in football had unspoken suspicions about the sexual abuse or exploitation of boys. As in so many of the situations described to this Review the role of *the bystander* has been a prominent issue and one of very real relevance to sexual abuse in Scottish football. This issue is examined elsewhere in this Report.

Decisions to leave football

"I literally felt the fire in my belly go out as I walked out of his office that day." (Contributor - then aged 15)

1.118. It is a consistent and recurring feature of the narratives provided to the Review that many young men who experienced sexual abuse (especially continuing over a period of time) made the decision to suddenly cease any participation in or pursuit of a career in football.

1.119. We should also note that some were not simply grassroots football players among many thousands but were of considerable promise who, after years of sacrifice and training, demonstrated noticeable skill and potential. Their (outwardly) 'sudden' decision to leave football altogether should have been one of significant interest and concern to those around them – not least at the clubs where they were playing and training at the time. However, this appears not to have been the case. At least, if it was, there is no evidence of anyone acting on it.

1.120. The Review learned that a coach who knew of an allegation against another coach speculated that this could be connected to other young players suddenly and inexplicably leaving the club at that time.

1.121. This is a shared experience across many of those who contributed to the Review especially (but not exclusively) those who had gone on to train as professional footballers within senior clubs. On no occasion noted by the Independent Review did anyone from the coaching or managerial staff of these clubs make any enquiries as to what had led to a decision by a young player to suddenly and inexplicably stop playing. This initially was remarkable to the Review and seemed an extraordinarily uncaring and casual way of dealing with young people at the cusp of a very promising career.

1.122. However, it is clear (and was on occasion actually reported to us by people who were active in coaching at the time) that these young players were viewed as little more than potential assets especially through equating their skill and acumen with possible commercial value. Where there were a number of eager young people in waiting with similar promise or motivation it was not seen as important to make an effort to retain a teenager who decided to leave irrespective of how sudden or inexplicable this decision was. The focus simply seemed to shift onto another young person to replace them. If this sounds callous then this is exactly how it was experienced by the young men concerned and by their families. We are of the view that this represented a particular aspect of how the game was organised at the time and the prevailing style and approach to coaching young players. It is a matter of interest therefore the extent to which this has changed and the modern game is different - especially considering recent reforms of the club football academy structure.

1.123. The Review was struck by the lack of interest shown at the time in Clubs concerning the possible reasons young players had for deciding to leave abruptly. At its most basic it might have been assumed that clubs would have followed this up even to try to preserve the skills and abilities of a young player within the club.

1.124. Moreso, it is our view that this should have been an automatic aspect of their obligation to pursue a duty of care to young players. Determining the reasons for a sudden unexplained departure from football (especially by a young player with a history of excellence who had devoted considerable time and effort to the game) is primarily about ensuring the wellbeing and best interests of the young player. But it also would be seen as a serious gesture of commitment by a club to a young player. And, if there are more concerning reasons for a decision to depart (such as experiences of abuse, or bullying, or harassment, or other adverse reasons) it allows the club to help young people to talk about these so they can be supported and helped and so the reasons for the departure can be properly addressed. This is not what happened in the accounts received by the Review.

RECOMMENDATION 3

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

It is recommended that all clubs and academies, with the assistance of the Scottish FA and the relevant ANA put in place proper processes of due diligence in all cases focused on the welfare and safeguarding of young players to respond to unexplained/undetermined changes in behaviour or decisions to leave.

Progress since Interim Recommendations of June 2018

The Review understands that the Scottish Football Working Group will be examining this issue in 2020.

‘Vulnerability’ and resilience

“I didn’t know what was happening. I was 10 years old and I assumed that I had done something wrong” (Contributor – then aged 10)

1.125. Throughout the Review was struck by the diversity of those who engaged in terms of their previous backgrounds and childhood experiences outside of football.

1.126. It is to the credit of football that it provides a tremendous outlet for young people whether to hone skills and interests or to deal with (or sometimes escape) the pressures they face in other parts of their young lives.

1.127. The conversations engaged in during the Review have highlighted some important assumptions about the factors associated with some of the young men in Scottish football being targeted for sexual abuse or exploitation.

1.128. For example, it is an important aspect of one account that the boy was, prior to meeting his alleged abuser, an outwardly resilient and ‘street-wise’ teenage boy with considerable skill both in football and socially. In other words, this young player did not fit the somewhat stereotypical characterisation of the “vulnerable young person” who is socially isolated, unaware and easily victimised. This is an important issue in understanding sexual abuse in Scottish football since it ‘upends’ assumptions about young people who might be ‘at risk’.

1.129. The characteristics of particular victims of course may play a part in how people target and then abuse them. (For example, we know from extensive academic and clinical research that disabled young people are particularly ‘vulnerable’ to abuse).

1.130. But outward confidence and self-assurance, skill, and apparent self-reliance are obvious facets which many would assume would act against a young man being targeted by a sexual abuser. However, it is clear that these are not deterrents to sexual assault by a determined and callous individual and, indeed, may be used skilfully against a boy to ensure his ongoing silence.

1.131. If anything, this is a clear reminder that, within sport, we should perhaps revise our assumptions of what ‘vulnerability’ means. This has been a recurring theme in the situations described to the Review and a common feature of those young men who have been directly and personally affected by sexual abuse in football. This strongly indicates to the Review that there is a need to revisit assumptions across settings concerning the “vulnerability” of young people and perhaps also to become more cognisant and aware of the modus operandi of abusers as a key factor in our thinking about possibility and probability of abuse and about its prevention.

1.132. It is the view of the Independent Review that within Scottish football any efforts to prevent abuse or to train and equip staff, coaches, volunteers, players or bystanders should take this seriously into account.

1.133. However, some other contributors clearly had challenges in other aspects of their lives growing up and before they took up football. Some were experiencing serious family problems or difficulties in their relationships with their parents. Some commented how adults who may wish to exploit these deficits almost seemed able to ‘sense’ them and therefore target the young person as a result. One important and extremely positive aspect of football is its capacity to engage with children and young people experiencing difficulties, challenges and adversity in their lives and to contribute significantly to improving the quality of their lives and experiences. We should not underestimate the capacity of football (and sport in general) to contribute very positively to improving the lives of young people and subsequently their physical and mental

wellbeing as adults. Nor, on the other hand, should we underestimate the possibility of others exploiting young people who are experiencing sometimes important deficits in their lives.

1.134. The resilience which children develop across other parts of their lives where there is stability, security and nurture help them withstand adversity and this has been evident with some of the people who have provide personal accounts to the Review. For them the experiences of sexual abuse which they encountered at key points in their development have resulted in unimaginable challenges and problems through their teenage years and into adulthood. Many have managed to work through these, largely unassisted, towards greater health and stability over recent years.

1.135. Some have engaged with services for additional support to help them work through particular challenges. And for others this is an ongoing factor for them which they still navigate daily.

1.136. The Review was enormously impressed by the grit and forbearance of those who have contributed, often having experienced (or still experiencing) difficulties and adversity – especially in mental health – on a daily basis.

1.137. For others however, the weight upon them was unbearable and the Review has continuously been aware of this.

RECOMMENDATION 4

The Review recommends that representations of 'vulnerability' in training, policy, public materials, campaigns and targeted intervention in Scottish football (and in sport in general) should take full account of young people who do not conform to predominant stereotypes of 'vulnerability' especially in relation to how they may become exposed to risk of sexual abuse or exploitation in a football context.

Progress since the Interim Recommendations of June 2018

The Review understands that this recommendation has been considered as part of the review of the Scottish FA's policy on the Wellbeing and Protection of Children and Young People in Scottish Football. This is awaiting approval and the Review is assured that thereafter this will be rolled out to Association members during 2020, with all members having reviewed and revised their policies by 31 December 2020.

Suicide, self-harm and suicidal thinking

"The only time I'll feel free is when I die" (Contributor - then aged 14)

1.138. Almost every account provided to the Review speaks of suicide attempts or suicidal thinking. This is especially, but not exclusively, where sexual abuse/alleged sexual abuse was prolonged and repeated.

1.139. The Review heard descriptions of strong suicidal thoughts being experienced by very young teenagers and continuing and often increasing well into their adult lives.

1.140. Many also made attempts to take their own lives or engaged in prolonged or episodic self-harming behaviour – including substance abuse and addiction.

1.141. These attempts were described as the result of overwhelming feelings of shame, guilt, self-loathing, anxiety, and purposelessness. It is also the case that these feelings, and the consideration of suicide, can be traced back to the onset of the experiences of alleged sexual abuse which they talked about.

1.142. In effect then, the consequences of sexual abuse for these young men, in terms of their mental health and wellbeing, are often profound. These consequences go way beyond the physical pain or repulsion they experience at the time of the abuse. They also go beyond the worry and severe confusion they experience at the time in respect of their own identity and feelings, the impact of disclosure and the stigma. The mental health consequences of what happened to these young men are life long.

1.143. A considerable number of those who spoke to the Review worked very hard to overcome these consequences and many achieved a remarkable level of stability in their recent lives as a result.... often with the support and resilience of family members.

1.144. Sadly, however the Review was made aware of a number of circumstances where it can reasonably be concluded that people have taken their own lives and so their stories remain untold.

1.145. Many contributors spoke of people they had known, or knew of, who had either committed suicide or died through chronic substance/alcohol abuse. They reflected on this and were firmly of the view that football related sexual abuse had contributed to these deaths.

1.146. The Review spoke with the widow of one ex-player who died following a long history of alcohol abuse and mental health problems which may have been a consequence of sexual abuse. The Review is also very aware of similar accounts from outside Scotland.

1.147. This is the ultimate price, the ultimate consequence. It is an outcome that is absolutely unacceptable and we owe it to these people, and all those affected, to ensure that the price they have paid is not in vain.

Those who have not come forward

“He was prolific. I just know that there are so many other guys out there that can’t or won’t come forward” (Contributor – then aged 12)

1.148. The Review was constantly made aware of the burden of the personal consequences that fall on young people who consider reporting these experiences to the authorities both then (in the 1970’s and 80’s) and now and the serious obstacles that they face when considering reporting.

1.149. It is a mistake to believe that these obstacles are any less for adults who consider reporting abuse which happened to them when they were young and therefore long after it has happened. The Review believes that these issues still have deterred many from coming forward especially when they also consider that these painful and intimate experiences may be placed firmly under public gaze.

1.150. It is questionable in the 21st century the extent to which we have created a cultural context that allows adults freely to report their experiences, where these issues are understood and proportionately discussed, and where they are openly and supportively dealt with. Recent treatment of football players who have been open about their mental health issues confirms that many in Scottish society have not evolved in their attitudes to mental health and those who experience difficulties. It is almost certain that this applies to the experience of child sexual abuse also.

1.151. The consequences for adults coming forward mirror those facing young people at the time when the abuse took place. In understanding this, within a football context it is also necessary to think carefully about the culture of football and the particular pressures that places on people in relation to these issues.

1.152. The Review is of the view that many people who have experienced sexual abuse or exploitation in Scottish football have not come forward.

They have perhaps never even considered doing so. This may be because they still do not construe their experience as 'sexual abuse' and have come to understand it in a very different way partly as a way of coping with how it made them feel. It may be a result of weighing up the consequences of coming forward on their own personal circumstances and whether the likely outcome of doing so is worth the effects they believe will ensue.

1.153. The challenges for adults in coming forward (long after they have experienced sexual abuse) are very similar to those which young people face. They too have to consider issues and possible consequences such as possible stigma, ridicule, disbelief, and shame. For many, coming forward is a leap of faith. It requires them to go into a situation which they have not experienced before trusting that others will do the right thing. We should remind ourselves that trust and betrayal are at the heart of child sexual abuse and these themes resonate every bit as strongly for adults many years after sexual abuse has occurred.

1.154. The Review takes the view that there are potentially many people, some still active within football, who have experienced sexual abuse as young players but who have still not come forward or told anyone of their experiences. Some of these, in our view, include those at the top levels of the game as players, coaches or management. For them the glare of publicity that is likely to result from coming forward is not welcome and would only serve to intensify feelings of shame, stigma and self-doubt. This is nothing to do with courage or the lack of it. It is a direct consequence of the abuse itself and indeed is exacerbated by the stance we as a society often take towards people who have been sexually abused as young people and the sometimes salacious and intrusive ways these accounts are reported by the media.

1.155. For adult male footballers the hyper-masculine culture of football makes such decisions even more difficult. The fear of being judged by other men as somehow weak or damaged is a significant deterrent to them talking openly of their experiences. And even the ongoing stigma in football attached to being thought of as gay adds to this.

1.156. It is incumbent on Scottish society and, particularly on those in Scottish football, to work tirelessly to remove all barriers and obstacles to people coming forward whether as young people or as adults. If this means tackling head-on the culture of Scottish football then the Review would expect all involved in Scottish football to step up to the plate and do so.

RECOMMENDATION 5

The Review is acutely aware that it is likely that many people personally and directly affected by sexual abuse either in the past or more recently have not come forward.

It is of vital importance that barriers, whether real or perceived, are identified and removed which militate against people coming forward to get help or seek justice or personal resolution.

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

Progress since the Interim Recommendations of June 2018

The Review understands that support is now available and in place through the Hampden Sports Clinic and bespoke care plans following an initial needs assessment. The Review has been informed that information on survivor support on the Scottish FA website is in the process of being developed and expected to be in place by the time of publication of this Report.

RECOMMENDATION 6

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

It is recommended that **all** staff (whether professional players, managers, coaches, support staff, volunteers or whoever) are made aware of how to respond, both interpersonally and in terms of onward protection and wellbeing, to personal revelations of experience of sexual abuse or other possible mental health problems.

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

The Review believes that changes in attitude are essential to create a culture capable of listening to and supporting team members. This should include helping all team members understand how to respond to peers constructively demonstrating solidarity and support to their team mates and others who may need it.

All staff and players must be helped to understand how to assist someone affected by sexual abuse (or indeed wider mental health issues) in the first instance but also to follow through on duty of care, safeguarding and other responsibilities. This should include proportionate information and training across the club on 'trauma informed responses' etc.

Progress since the Interim Recommendations of June 2018

The Review understands that this will be considered for inclusion in the Scottish FA 2021 Implementation Plan.

Loyalty

"The worst part of all of this was breaking the news to my dad 35 years later and seeing the look of shame on his face. That hurts so much because he did nothing wrong" (Contributor – then aged 14).

1.157. Loyalty is arguably the beating heart of football in Scotland. It embodies and inspires passion and commitment. It underpins cohesion and bolsters a common identity. But it also cements a tribalism that has a serious downside. For those who told the Review of their experiences of sexual abuse as young players *loyalty* played a significant role in deterring them for a long time from talking about these experiences.

1.158. Often this was misplaced loyalty to a peer group but nonetheless understandable considering how important peer relationships are to adolescents growing up.

1.159. More often loyalty was to the team and was interpreted as not doing anything which might harm or injure the reputation or standing of the team. For many of these young men this meant remaining silent about the alleged abuse they had experienced under the team's watch. Those who were responsible for abusing young players were, in all likelihood, very aware of the strength of this loyalty and exploited it for their own purposes.

1.160. In Scottish football however, loyalty goes beyond the team. For some young players the passion and investment of their parents (often fathers) was an extension of this. Sometimes young players were signed by senior teams (or boy's clubs with close ties to senior teams) for which their family and traditions had strong (and sometimes generational) loyalty and support. So, the consideration of revealing their experiences of abuse inferred disloyalty not only to the team but to the family also. Some of the contributors to the Review spoke about their fear that any revelation might badly affect their parent whose loyalty to the senior club was intense. The pride that their parent had invested in them was therefore in serious jeopardy if they told.

1.161. Despite the betrayal of these young people by their abusers/alleged abusers, the perception of many young players was that they would be betraying the club to which they were devoted, and indeed their family and its traditions, if they spoke up. The Independent Review spoke with men who had made allegations of sexual abuse as young players and continuing to support (and even hold season tickets to) the club under whose watch the alleged abuse occurred. For some this means attending home games in the very site where the alleged abuse took place - a constant reminder to them of the event and of the anguish they faced in trying to deal with it.

1.162. Loyalty to a team and the sense of community it evokes can bring about positive social cohesion and solidarity. However, the Review discovered how this has so often acted against the interests and safety of young people and how they have paid the price for their allegiance which has effectively cut them off from the help, support and protection they needed and deserved.

Fear of the perceptions of others

1.163. All those who provided personal accounts to the Review were very candid and insightful about the impact these alleged events have had on them as adults.

1.164. This was particularly so for those who had become extremely sensitised to the perceptions of other people if their experiences of sexual abuse were known. Some said that they believed that other adults would assume, if they knew they had been sexually abused when they were young, that they too might pose some sort of risk to young people. Indeed, some contributors expressed this as inhibitors on them both as parents and as a potential coach.

1.165. This is an inordinately unfair and disproportionate burden on people who have endured sexual abuse as youngsters. It remains to be seen whether these perceptions by others are actually held or not. It is the opinion of the Review however that these feelings more likely represent the anxiety, self-doubt and self-recrimination that are directly attributable to earlier experiences of sexual abuse. Again, we are struck by how pervasive the effects of sexual abuse have been on those who we believe experienced it and the complexity of these. It is important to remind those in Scottish football of this and again emphasise the seriousness of what has occurred.

Desensitisation

"I am almost ashamed to admit it but he paid me money and I kept it but I just didn't understand what it was for. Now I know" (Contributor – then aged 11)

1.166. The accounts given to the Review frequently contained information about the efforts that were made to introduce young players into sexual activity – without their consent and without their understanding. It should be remembered that many were of an age and stage of development where sexual activity was unfamiliar and singularly inappropriate and harmful. For others, who were already entering adolescence, such activity which they were either coerced into or which was forced upon them by adults was a serious abuse of their rights, their bodies, and their emotions.

1.167. Some contributors spoke of alcohol being introduced into group activities, especially when on trips away from home. For teenage boys, then as now, this was often welcomed with some enthusiasm although it was not understood that this was part of a wider effort to coerce and disinhibit. Similarly, the purchase of gifts, the provision of treats and even the bestowing of favours acted as enticements and rewards but were part of a more sustained process of grooming and desensitisation.

1.168. Most commonly in the descriptions provided to the Review a gradual and persistent use of sexual language, prurient discussion and salacious banter created a sexualised environment where boundaries became blurred and where particular adults could then start to manoeuvre individual young people into situations where actual sexual activity could be introduced. This included occasional exposure to pornography.

1.169. These are common features of ‘grooming’. This desensitisation and preparation for abuse can continue and be sustained over lengthy periods and can also be truncated, as with B above, into a short space of time. The purpose is to render young people more susceptible to abuse, less likely to resist or report, and to maximise the opportunities and gratification of the abuser.

1.170. The Review received accounts of young players being made to strip naked and being subjected to physical chastisement administered to private areas of their bodies. For some this remained a confusing experience but is now clearly a highly sexualised act which formed part of a process of greater desensitisation. Others alleged that they were subject to or witnessed sexualised rough play when in the shower or in changing areas. We were told that this often happened in groups where it was less obvious to individual boys that there was an increasing possibility of individual risk.

1.171. Even the use of scary games in the middle of the night which frightened, excited and disorientated boys can be seen as part of an overall picture of desensitisation and disempowerment.

1.172. The Review heard accounts from more than one contributor of a team visit to England where the boys stayed, with a coach, in a hostel. The boys were taken to a swimming pool where a number of adult men were present and who were walking about naked. Alcohol consumption also featured in this situation. Later, when these boys had returned to their sleeping accommodation, some of these adult men attempted to enter their room and the boys, all young teenagers, were forced to barricade themselves in to protect themselves. This was a very frightening and disturbing event and can also be seen as part of a process of desensitisation of these young men.

1.173. The Review takes this issue very seriously. It is incumbent on all those with responsibility for Scottish football to ensure that alcohol (or drug) use among or with young people is not only prohibited but that vigilance is carefully exercised.

1.174. Similarly, the use of sexualised language or banter by those in positions of leadership should be challenged and dealt with whenever it occurs. When young people use sexualised

banter – especially if it is demeaning, derogatory or disrespectful – this should be challenged and dealt with not only by action but by education.

1.175. The Review is well aware that many current practices and codes deal with these matters but we are also very aware of how these behaviours can slip by and be seen as insignificant or merely misplaced humour. This was often how it was viewed on those occasions when it was actually part of a more sustained effort to desensitise young people and create a sexualised culture where sexual abuse became more likely and less noticeable.

Hazing

1.176. The imposition of strenuous and often humiliating tasks as part of training or ‘initiation’ (hazing) also featured in some accounts received by the Review.

1.177. For example, some experienced and witnessed acts designed to humiliate and shame team members. Many others spoke of an approach to ‘training’ that went well beyond testing and developing physical stamina and mental resolve but which was clearly designed to impose dominance and control over boys and create a culture where boys would be rewarded for participating in shaming others. The Review is encouraged that such approaches and practices are no longer acceptable aspects of coaching practice in Scottish football but we also understand that there are still vestiges of a coaching ‘philosophy’ which is open to such abuses and practices. This is addressed elsewhere in this report.

1.178. Hazing however also often acts as an ‘induction’, a ‘rite of passage’ and a gateway to acceptance by the wider group. Often hazing (in sports particularly) has marked sexual aspects. The Review did not learn that this was widespread in Scottish football, but we are aware that it was a feature of the experiences of some young players. Indeed, we were also told of instances where serious bullying and humiliation were part of the players experience in senior teams.

1.179. For many years abusive practices were ‘justified’ by many as a display of the sort of rigid discipline required in teams and where physical and mental fortitude and stamina are required. The Review expects that such remaining views within Scottish football are challenged and steps taken to remedy both this mindset and the behaviours that result from it.

1.180. The Review also expects those within football to remain vigilant about any sign of hazing practices among young people and deal with this effectively and through education.

Organised Sexual Abuse/Sexual Exploitation

1.181. “Organised sexual abuse and exploitation” involves multiple adults arranging and planning to sexually abuse or exploit one or more children or young people. It can include the exchange of children or young people for sexual purposes between perpetrators; the production of child sexual abuse images; and the exploitation of children and young people for financial gain or other advantages.

1.182. During the course of the Review it was apparent, in a limited number of circumstances, that the adults involved or alleged to have been involved knew other adults who were subsequently charged and/or convicted or named in allegations concerning sexual abuse in football both in Scotland and England.

1.183. The Review considered that this may have been an aspect of being active within a game where it was not uncommon for people in official positions to know each other considering also the size of Scotland.

1.184. Furthermore, the Review has received accounts with specific information concerning possible organised sexual abuse and these are now subject to criminal investigation in Scotland and are also reported to the English FA Independent Review.

1.185. These include instances where it is alleged that young players were knowingly introduced between adults in football for the purposes of sexual abuse and sexual exploitation. This also involved introductions contrived through cross border footballing activity and between several adults (some or whose identities are unknown). Furthermore, such organised activity is also alleged to have occurred through activities in countries other than Scotland and England.

1.186. The Review views these alleged instances as extremely serious and an escalation of sexually abusive activity.

1.187. The accounts received by the Review where “organised abuse” is a factor emphasise particular factors and issues which are touched upon elsewhere in this Report. This only further focusses our attention on these areas and the need to ensure that they are the subject of intense consideration and change if football in Scotland is to ensure that organised abuse cannot occur under its auspices in future.

1.188. The areas of particular importance and which feature include:

- The use of football activity (especially coaching and scouting) as a means for particular adults to network and, in doing so, introduce young players to others for sexual abuse and exploitation purposes
- The poor supervision and accountability in the arrangement and conduct of footballing trips within and outside Scotland
- Bystander issues including the inability of witnesses (both peers and adults) to comprehend concerns, challenge behaviours in adults or for them to report concerns
- The manipulation, by adults, of multiple (possible) peer victims to reinforce fear and shame and therefore impose greater control and incapacity to tell
- The use of enticements, favour and rewards to isolate and establish the pre-conditions for sexual abuse by more than one adult and ensure silence

1.189. The Review strongly urges the Scottish FA and its members to pay close attention to this issue and the concerns which arise in their deliberations following the publication of this Report and in the reforms and improvements they intend putting in place to prevent such activity (and the serious harm which ensues) from occurring.

Conclusion

1.190. It is not possible to even come close to describing faithfully and comprehensively the issues and challenges which contributors spoke about to the Review. No amount of effort on the part of this Review could do them justice. However, the Review firmly believes that the impact of sexual abuse on those who have experienced it is central to an effective response and to making sure that any young person involved in football in Scotland never has to deal with these issues again.

1.191. Nobody in Scottish football should be left in any doubt as to the seriousness of this issue and the ongoing consequences and impact of these alleged events. We should also be equally clear that where there is a possibility of such events still occurring and it is unacceptable for everyone involved in Scottish football not fulfilling their responsibilities to protect young people involved with the game and to reduce risk.

1.192. The impact on those who have been affected has informed many if not all of our findings and recommendations even though we have chosen to disperse these throughout this report. Almost all of our findings have direct relevance to the personal accounts of individual contributors.

1.193. However, the Review was also tasked with examining, individually and collectively, what was known about these events at the time and who knew. This of course is a retrospective task and one which deals directly with issues of accountability and responsibility.

1.194. The Review was interested in how actual reports alleging sexual abuse of young people in Scottish football were dealt with at the time. Our conclusion is that most such situations *were not reported* by young people at the time and consequently no-one in Scottish football knew. Of those that were reported it appears that only limited action was taken as a result in most cases – and on no occasion which the Review looked could it be confirmed that this included a direct or formal report by those in Scottish football to the investigating authorities at the time or following a report of sexual abuse within football from a young person - other than in the more recent case of a young female player at a Women’s (Ladies) Team where procedures for managing concerns were followed appropriately.

1.195. The Review was careful to understand why young people generally did not come forward and this has been addressed earlier in this section of this Report.

1.196. However, the Review also recognises that how individual reports from young people at the time were (or were not) dealt with is a related but often different matter as to how suspicion or information about individuals were acted upon.

1.197. From the accounts received and considered and from enquiries with those who were around at the time (as well as from open source research etc) the Review has concluded that there may have been a degree of suspicion and concerning the alleged activities of some adults involved in football at the time. The extent to which this was taken seriously varies and the extent to which these were acted upon – or not - creates cause for concern.

1.198. The Review is therefore minded that certain adults were able, quite deftly, to navigate their way around Scottish football to their own advantage; manipulating relationships with other adults in the Scottish game; relying on complicity and collusion; concealing their activities behind their ‘authority’ and position and the advantages that followed; and often “in plain sight” targeting, isolating and grooming young players for the purpose of sexual abuse and sexual exploitation.

1.199. These were not “passive” factors making up a general context or background to serious and widespread abuse. These were part of a dynamic of grooming and abuse where those with suspicions, “discomfort”, unallayed concerns, and possibly actual knowledge became *protagonists* (perhaps unwittingly) in creating and continuing the conditions in which significant numbers of young players could be sexually assaulted, abused and exploited.

The Scottish Football Association

1.200. In addressing the question as to the Governing Body’s awareness of or knowledge about specific allegations the Review concludes that on the occasion where it is understood that an individual contacted the Scottish FA (some time after the alleged events occurred) to make an allegation of sexual abuse/raise concerns about an individual operating in Scottish football, there appears to have been little consideration or follow up by the Scottish FA at the time.

The Review therefore also concludes that this falls short of the appropriate action that could have ensued from such a report or concern being raised.

1.201. However, the Review again re-iterates that the purpose in asking these questions and seeking answers has essentially been to accomplish two things: -

1. To clarify *accountability and responsibility* where possible and
2. To draw lessons so that changes can be made to ensure that any shortcomings are addressed and put right.

Clubs and organisations

1.202. Since the beginning the Review has been asked whether, as a society, our general understanding of what constitutes sexual abuse and what constitutes risk to young people is very different now than it was between the 1970's and the 1990's and whether this might explain why actions were not taken as they should have been and young people not adequately protected within Scottish football.

1.203. It is the view of the Review that while this context may have some general relevance it is not sufficient to justify lack of action or lack of accountability. The concept of a 'duty of care' to young people was widely understood in the 1970's and has been ever since. Even where there was an absence of protocols or procedures in football for dealing with such suspicions or information the Review concludes that this, in itself, does not abrogate a duty of care on the part of the individual, the club or Scottish football as a whole.

1.204. Indeed, in considering these matters and the accounts provided to the Review it is evident that some of the decision-making about these issues at the time was driven (at least in part) by a desire *to protect the reputation of the club or organisation* before protecting young people from harm. If this is a regrettable aspect of the history of football in Scotland then it is to be hoped that this is no longer a motivating factor in making decisions about the safety and wellbeing of young people in Scottish football today. Those responsible for the game at every level have a clear obligation to ensure that this is so.

1.205. The Review also would make it clear that all Clubs concerned who have engaged with the Review have done so willingly and have been, hopefully, as frank and transparent as possible with us about these issues. However, none have been able to provide the Review with documentation or records to confirm whether individuals were engaged or employed at clubs; dates of employment or engagement; whether reports were made and by whom; how suspicions or reports were handled and by whom etc. All these Clubs have confirmed in writing to the Review that they either do not hold or cannot trace or retrieve such documented records. In some cases, where specific information was requested this was not provided either because it couldn't be traced or because the Club concerned was prevented from doing so because of data protection rules.

1.206. This is an important issue. Although it has not significantly prevented the Review from piecing together a narrative of what (on the balance of probabilities) took place, it certainly inhibits its capacity to be authoritative about detail.

1.207. The Review has been largely unable to confirm that, where either knowledge or reasonable suspicion was present, Clubs reported these concerns to the authorities.

1.208. Therefore, in general, the Review has found that a general duty of care to young people in general appears to have been absent from such considerations at the time.

1.209. The extent to which this contributed to risk of harm is not certain but a high degree of specialist knowledge isn't required to conclude that, where people who were considered to present a risk were simply moved on, this does not effectively protect young people and does not satisfactorily reduce the risk of harm.

1.210. The Review is dismayed that some young people may have been exposed to risk and abuse because adults did not do everything they could to ensure their protection and wellbeing despite reasonable cause for suspicion that abuse was possible.

1.211. It is possible that, for some, the issue of the threshold between substantive knowledge and "suspicion" may have acted as a brake on considering wider risks or arriving at effective action. It is noted that where there has been a perceived lack of 'certainty' (concerning alleged sexual abuse across society and not just concerning football) this may have deterred people from taking further action or from gathering further information.

1.212. The themes and residual issues arising from this section and our conclusions are dealt with in the remaining sections of the Report and, where appropriate, lead to further recommendations for change.

SECTION 2: IMPROVEMENTS AND CHANGES 2000 – 2013

2. Introduction

2.1. The Review was asked "*to consider what lessons have been learned by the Scottish FA and its members and/or affiliated and/or associated organisations since those incidents took place and following any investigations that have taken place to ensure that the risk of abuse is reduced and where possible eliminated*". Effectively this has meant examining developments within Scottish football from the period in question and arriving at some conclusions as to whether it can be demonstrated that lessons had been learned and improvements put in place or in motion sufficient to ensure risk was reduced or removed.

2.2. It is fair to say that Scottish football has not remained oblivious to the protection of children and young people in recent years. Like wider society, as a major institution football has had to respond and adapt to the demands arising from a developing wider awareness of sexual abuse and child protection.

2.3. The Scottish FA and some clubs have, for some time, put in place a range of measures to improve their collective and individual capacity to protect young people from harm. Much of this was driven, to a large extent, by developments across sport in Scotland.

2.4. The focus of the Independent Review was whether the developments and changes within Scottish football concerning the protection of young people have been adequate and fit for purpose and whether the pace of improvement has been sufficient to meet the needs of young people and the challenges faced.

2.5. Although our primary concern, and that addressed in the Terms of Reference, was the sexual abuse of young people it is not possible to consider improvement measures and responses without widening the lens to consider safeguarding in Scottish football as a whole. By doing so we were able to draw some conclusions about the extent to which Scottish football has been adequately responsive in recent years to ensure risk is properly understood and reduced and that consequently young people in football are properly protected.

2.6. Comment is also made in Section Three in respect of progress made since the publication of the Interim Report of the Independent Review in 2018. Updated information about particular improvements are also set out throughout this Report specific to each of the (Interim) Recommendations.

Developments affecting Scottish football 2000 - 2014

2.7. The Review engaged with relevant personnel and senior managers in all senior professional clubs in Scotland; the staff and managers of all Affiliated National Associations; senior managers in the Scottish FA; officials across grassroots football clubs; recognised external stakeholders and partner organisations; current young players; and football supporters. These discussions and consultations have provided extensive information about the current approach and arrangements within Scottish football and also important information about the previous development of safeguarding within the game to the present day.

The Scottish FA

2.8. Generally speaking, sport in Scotland only began to address child protection/safeguarding/wellbeing issues seriously in the early 2000's with the establishment of the Child Protection in Sport Service (which preceded the Child Wellbeing and Protection in Sport Service) at Children 1st in 2002/3. This service was put in place in partnership between SportScotland (with a funding contribution from them) and Children 1st (formerly RSPCC) one of Scotland's largest child protection and child welfare charities. The service had a range of areas of interest including developing template policies and processes for Sports Governing Bodies (SGB's); overseeing and assisting with improvements to Disclosure processes; and acting as consultants for SGB's in relation to individual cases as they arose. A Child Protection in Sport National Steering Group was set up to oversee and monitor the progress of the units work through the implementation of a National Strategy for Child Protection in Sport.

2.9. Prior to the establishment of the Child Protection in Sport Service the Scottish FA, in 1999, commissioned work to be done to produce draft club policies on child protection and to provide some training. This also included basic training for Board members.

2.10. The training delivered for clubs at that time targeted those people recently designated to undertake child protection responsibilities which largely centred on processing disclosure checks.

2.11. This training was delivered by an external provider brought in by a Development Officer at the Scottish FA as an attempt to improve awareness and practice. We understand that this was not part of any plan or strategy by the Scottish FA and seems entirely as if it was initiated by individuals who saw the need for improvement and without the explicit ongoing endorsement of senior managers as part of a wider plan.

2.12. Similarly, the production of model club policies in 2000 (and the training that supported it) centred on the handling of child protection "concerns". The content and delivery were 'evaluated' ad hoc and not as part of any overall approach to progressing child protection capacity within Scottish football. This is an aspect of a familiar theme in the development of child protection/safeguarding improvements in football in this period (and, to an extent, today) that it was more a question of the right person being in the right place at the right time rather than any concerted strategic plan within a regime of clear accountability and direction.

2.13. The view of the person who undertook this piece of work is that much of the approach, at club level, was a "box ticking" exercise to comply with statutory requirements to provide disclosure checks rather than any serious attempt to embed good quality safeguarding practice throughout and across football.

2.14. When the development work concluded, and the person within the Scottish FA (who had been responsible for initiating and driving this) left, the momentum was largely lost within a couple of years. In the early 2000's there is little evidence of child protection development activity within Scottish football comprising much more than disclosure checking of staff and volunteers and the Review is not confident that this was an even picture across the Scottish game and all ANA's.

2.15. In 2004, the Child Protection in Sport Service at Children 1st, assisted by funding from SportScotland, went on to appoint a Head of Service and a Project Officer to work with Sports Governing Bodies to develop and implement safeguarding measures within sport. The following year (2005) the Child Protection in Sport Service finalised the first (Child Protection) Minimum Operating Requirements (MOR's) for sport in Scotland. This set of measures sought to standardise child protection activity and delivery across sport but it is important to remember that these were *minimum* requirements which SGB's were expected to self-monitor and self-assess in relation to compliance. Associated with this, and as a means to gain 'buy-in' from Sports Governing Bodies, the Child Protection Accord was launched in 2006 and SGB's (and other bodies) were invited to become signatories. It was quickly understood by the Child Protection in Sport Service and by SportScotland that buy-in and compliance was variable across (and even within) individual sports. The MOR's therefore became the basis for investment from central government via SportScotland. The overall approach therefore to SGB's was "carrot and stick" – to enable, support and facilitate improvement but also to make clear the potential consequences of not complying with the MOR's.

2.16. 2005 therefore marks the substantive start of the 'safeguarding journey' in the Scottish FA and Scottish football even though disclosure checking had been in place for some time and some intermittent training had been provided to clubs since the late 1990's. But even though 2005 effectively marked the start of the 'journey' for Scottish football it would be a mistake to think this was even-paced, straightforward, or focused.

2.17. The Scottish FA, like other SGB's, was fully aware of the MOR's in 2005 and were invited to voluntarily sign up to these measures to put in place minimum measure to protect young people in football. At that time the individual with overall child protection responsibilities within the Scottish FA was the Head of Human Resources. These responsibilities centred mainly on processing of Disclosure Checks and were added on to the existing commitments and responsibilities of managing human resource demands and statutory requirements.

2.18. We understand that, in 2005, the Child Protection in Sport Service reviewed the websites of SGB's to assess the prominence of safeguarding and related content in their 'public facing' information. At that time the Scottish FA website contained no such information or details of child protection provision within football.

2.19. By 2008 it appears that the Scottish FA was mainly compliant with the MOR's but progress had apparently been "slow" although there was a reported confidence that the Scottish FA would be in a position to continue to meet the MOR's. However, there was far less confidence that the Affiliated National Associations in Scottish football would reach compliance at that time. This difficulty was acknowledged by the Scottish FA who worked in partnership with the Child Protection in Sport Service to try to bring ANA's together to work towards fulfilling their obligations to meet the Minimum Operating Requirements. It seems that these efforts were largely unrewarded.

2.20. The Scottish FA eventually signed up to the Child Protection in Sport Accord on the 31st March 2008 two years after its launch.

2.21. However, efforts by the Scottish FA to bring about collective commitment and consensus with their ANA's was less successful and it is reported that the Scottish Youth Football Association (SYFA) in particular was less cooperative and committed than other ANA's.

2.22. Similarly, we understand that the Scottish FA itself was not particularly 'driven' at this time to take things forward and that there seems to have been a general inertia in relation to improvement and sustaining any progress made to date.

2.23. This apparently inconsistent direction within the Scottish FA concerning the safeguarding of young people and the relationship between the Scottish FA and the SYFA (one of its Affiliated National Associations) prevailed for the next few years. By 2009 it appears that this had reached a critical point when the Review was told by one contributor that there was *"frustration with the lack of access to and transparency within the SYFA where there was mass participation of young people.....and frustration also at the Scottish FA's inability to influence the..... SYFA to engage with Safeguarding in Sport"*.

2.24. Although the Scottish FA was mainly compliant with the MOR's in 2009 and were "making good progress" this was not fully implemented because there was a lack of minimum operating requirements within the Affiliated National Associations. This tension, in our view, primarily arises from the affiliate membership structure of the Scottish FA and is dealt with elsewhere in this Report but at the time it formed a significant backdrop to problems in compliance, progress, and accountability in relation to the protection of young people within Scottish football.

2.25. This slow progress and the impediment arising from non-compliance by ANA's continued into 2010 when there was a new Chief Executive appointment within the Scottish FA. By 2010 staff of the Scottish FA were regularly participating in child protection workshops provided by the Safeguarding in Sport Service.

2.26. In 2011 a more robust system of compliance with the MOR's was created by the (by then) Safeguarding in Sport Service. Consequently, the Scottish FA failed to meet the MOR's and was deemed non-complaint. A website review however found that the Scottish FA website contained relevant PVG and child protection policies.

2.27. By the following year the Scottish FA once again achieved compliance with the MOR's but there was continued concern about the poor progress within Affiliated National Associations and especially the SYFA. The Safeguarding in Sport Service continued to attempt to influence change towards greater compliance by ANA's focussing on the investment contract between SportScotland and the Scottish FA.

2.28. In 2013 the investment conditions were amended to **require** the Scottish FA to work with SportScotland and the Safeguarding in Sport Service to *complete safeguarding questionnaires* with its Affiliated National Associations. It should be noted the amount of effort that it took to get to the point where the Scottish FA was compelled as part of an investment contract to require its ANA's only to complete *questionnaires* let alone make actual changes to achieve minimum standards.

2.29. To a certain extent this demonstrates an ongoing problem within the Scottish FA – the structure and arrangements allowed by the Affiliate Membership structure to an extent hinder the Scottish FA providing clear direction and control in respect of its members and members demonstrating clear accountability for their business within the current structure. When it came to "safeguarding" the inertia caused by this detrimentally affected the development and adherence to a clear way forward and therefore to the ongoing delivery of protection of young people and reduction of risk. Within this structure accountability and responsibility can often be

unclear to users, partners and, indeed, the members themselves. This context was not conducive to good safeguarding practice or a satisfactory organisational safeguarding culture and this seems to have been clearly illustrated by the issues continuously prevalent from 2008 to 2014 and beyond. This will be further dealt with in Section Three of this Report.

2.30. In 2012 a new Director of Football Governance and Regulation was appointed by the Scottish FA. Shortly thereafter, by 2013 responsibility for safeguarding children and young people had transferred to this official from the HR Department. In 2014, largely due to the efforts of this individual the Scottish FA created a dedicated salaried post of Child Safeguarding and Wellbeing Officer and made an appointment.

2.31. As far as the Independent Review is concerned this effectively marked the point at which the Scottish FA began to take its wider safeguarding responsibilities seriously and back this up with a level of investment. However, it is not the case, as far as we can determine, that the appointment of the Safeguarding and Wellbeing Manager (and subsequently some other temporary posts to support her) signalled any wider Safeguarding Strategy within the Scottish FA aimed at systematically improving the capacity of Scottish football to safeguard and protect young people.

Football clubs

2.32. Throughout this period (2000 – 2016) there is an inconsistent picture of how the protection of young people was progressed or approached by football clubs across the Scottish game from senior professional clubs to grassroots football.

2.33. This inconsistency is in part explained by the complex and uneven landscape of accountability within Scottish football. Youth football clubs are generally overseen by the SYFA; women's and some girls' clubs fall under the ambit of Scottish Women's Football; senior professional clubs are organised and overseen by the Scottish Professional Football League (SPFL); semi-professional teams would compete under the auspices of the Scottish Junior Football Association and so on. In other words, the Affiliated National Associations (ANA's) are affiliate members of the Scottish FA and clubs, in turn, are members of the ANA's. The place of various Leagues and regional organisations within this structure only served to complicate things even further. In this structure there are duplication and blurred boundaries. Complex lines of accountability were often 'shared' allowing different constituents to shift accountability for particular issues onto others. It has already been observed that the extent to which the Scottish FA was able to direct or even to influence the direction and pace of travel of its ANA members was limited (potentially obstructing and impeding the progress of safeguarding within football).

2.34. During this period football clubs, as far as we have been able to determine, were largely unmotivated to improve practices and arrangements for the protection of young players other than to undertake disclosure checks and put in place 'policies' (even though there is little evidence of consistency or that these policies were ever updated, comprehensively understood or implemented). There were, of course, some exceptions. For example, in the early 2000's some clubs had participated in training workshops made available by external providers. However, the organisation and arrangement of this training was largely down to the right person being in the right place at the right time and not to any overall plan, framework or agreement between clubs or ANA's.

2.35. The main focus of child protection activity within football clubs throughout this period was on *disclosure processes* with associated supporting policies. As such the responsibility for safeguarding issues within senior professional football clubs usually lay with Human Resources staff since safeguarding responsibilities were largely confined to 'disclosure checking' and 'responding to allegations of abuse'.

2.36. In grassroots football safeguarding responsibilities, such as they were, were undertaken by the leaders of the club allocated as part of their general duties or responsibilities (who were designated as Child Protection Officers (CPO's). Because of the general push around implementation of disclosure processes from the late 1990's onwards it became the norm for football clubs across the Scottish game to designate a 'child protection' or 'safeguarding' officer. However, this was almost always someone who oversaw disclosure processing within the club and who undertook these tasks voluntarily on top of other roles or functions within the club. There is no strong evidence that clubs saw their safeguarding responsibilities as much wider than this although some did develop policies and guidance to help club personnel respond to allegations of abuse.

2.37. Elsewhere in this report we will comment on the "preoccupation" with disclosure processing as an effective means to prevent child (sexual) abuse. It is beyond doubt that this has been a vital prevention tool across a whole range of areas of life in Scotland including sport, but it has not been, and is not, the entire picture and continued primary focus of resources on this has been to the detriment of improvements elsewhere.

2.38. Most of the training in the early 2000's therefore supported these areas of delivery and were mainly targeted at those people designated within clubs to oversee this activity. It is evident that the people designated with these responsibilities were often people with no background in child protection. Where this *was* the case, they were often designated on a presumption of knowledge or expertise (for example if they had previous or current professional experience in teaching, or social work or policing) rather than any clear role specification or evidenced previous background/training in child protection.

2.39. As far as meeting the clear challenges of safeguarding young people during this time, it is clear that football clubs received inadequate leadership or support from either ANA's or the Scottish FA in this period (hardly surprising perhaps given inconsistent progress in complying with the Minimum Operating Requirements between 2005 and 2013).

2.40. Although the Scottish FA and its ANA's were (largely) compliant with the MOR's by 2013 it should be remembered that these requirements were *minimum*. There is certainly no real sense of any constituent part of football doing much more than what was minimally expected before then.

2.41. Grassroots football clubs throughout this period were largely left to their own devices other than in respect of disclosure checking which, to some extent, the ANA's (with the exception of the SYFA) did deal with by putting common measures in place to ensure processing mechanisms through and by individual clubs. Some ANA's also helped member clubs develop and put in place procedures and some policies (especially in relation to the management of 'concerns'). However, it is very evident to the Review that much of this was a question of 'ticking boxes' rather than actually embedding safeguarding practice in the active work of the club and developing the capacity of clubs to protect young players.

2.42. What has emerged is a rather random picture across Scottish football. Some clubs did more than others. The Scottish FA supported some developments but not in a coordinated or planned way. The ANA's responded variably and some had almost no active profile in supporting or enabling clubs in improving safeguarding of young people at this time.

2.43. In the opinion of the Independent Review, this is largely attributable to a lack of strategic thinking in Scottish football in respect of the protection of children and young people which could be evidenced by an actual *plan* or a coherent deployment of resources to support this high-risk area of delivery.

2.44. However, in 2013 there appears to have been the beginnings of a clear shift in momentum in relation to child protection/safeguarding within Scottish football clubs.

2.45. Celtic FC were, in 2013, the first club in Scotland to create a *salaried* dedicated post of Safeguarding Officer with wider duties and responsibilities and recruit to this (part time) post. This came about in part because, following the allegations in the 1990's concerning Celtic Boys Club, Celtic FC carried out a review which produced a code of ethics and good practice and vetting procedures for staff and volunteers working with children and young people at Celtic FC. The Club continued to develop its policies and procedures and in 2012 the Club commissioned an external child protection review of its child protection policy, procedures and practices. The internal review highlighted a number of positive elements in place to protect children and identified a number of areas for development. All of the recommendations were implemented, one of which was that the Club appoint a child protection officer.

2.46. Prior to 2013 some clubs had added on a 'child protection' responsibility to an already existing salaried post but no other club had created a salaried post dedicated to safeguarding and protecting children and young people before Celtic FC did so in 2013.

2.47. By 2015 Aberdeen FC similarly appointed a dedicated salaried (part time) post followed similarly by Ross County FC in 2017.

2.48. It is the view of the Independent Review that this approach has considerable benefits especially for senior professional clubs and particularly for those with youth academies and/or community programmes.

2.49. Throughout the period 2000-2013 and beyond it cannot be said overall, with any degree of confidence, that safeguarding arrangements and practices within football clubs in Scotland had evolved to a degree that we can be satisfied that the protection of young people and reduction of risk were either priorities or consistently delivered. That is not to say that individuals within clubs were not committed to improvement. However, the glaring lack of a coherent (safeguarding) strategic plan across the game only intensified a situation where improvements and progress were somewhat random and more a case of individuals seizing initiative than any overall organisational or cultural momentum to safeguard young people. This was as much the case for grassroots clubs as it was for senior professional clubs and everything in between.

2.50. The Independent Review is minded to ponder what might have made a substantial positive difference to this situation and accelerated the sorts of developments and changes needed to bring football in Scotland to a place where it not only met minimum requirements but was placed became capable of going well beyond them to lead the field in safeguarding in sport. It is evident that there are a number of factors that would have made a real difference including: -

- a Safeguarding Strategy
- a simpler and more accountable structure;
- improved governance;
- clear and consistent leadership;
- better investment and resources;
- improved cooperation and communication within football;
- and a framework for measuring outcomes.

2.51. The question still arises as to whether these factors are now in place bringing Scottish football to a position of strength in relation to protecting the young people from sexual harm

and exploitation. These questions are directly addressed in Section Three of this Report. The Review is encouraged by the progress made in implementing a number of the recommendations made in the Interim Report of June 2018 and plans to implement further and is confident that this marks an increased commitment to achieving the improvements necessary to protect children and young people engaged in the sport.

SECTION 3: IS SCOTTISH FOOTBALL CURRENTLY PROTECTING YOUNG PEOPLE?

3. INTRODUCTION

3.1. The Review was asked “to consider what lessons have been learned by the Scottish FA and its members and/or affiliated and/or associated organisations since those incidents took place and following any investigations that have taken place to ensure that the risk of abuse is reduced and where possible eliminated”. Effectively this has meant examining current arrangements and practices within Scottish football with a view to considering if lessons have been learned since the events recently reported (and addressed in Section One of this Report) and the extent to which this ensures that risk to young people is reduced or removed.

3.2. Further comment is also included on the reported progress made by the Scottish FA and its members in respect of the 95 Recommendations made in the Interim Report of the Independent Review published in June 2018. This is additional to the update position given specific to each Recommendation throughout this report.

3.3. As the Independent Review considered the recent history of Scottish football in relation to the protection of young people (Section Two) it was consistently evident that a range of systemic issues are of direct relevance and have acted to slow down progress or, at times, impeded the wellbeing and protection of children and young people in football.

3.4. These have been indicated earlier in this Report and have remained prominent in our considerations of the current state of Scottish football in terms of its capacity to protect young people from sexual abuse and exploitation. This has been with particular regard to whether these issues have been effectively dealt with more recently leading to noticeable improvements in how Scottish football deals with this issue.

3.5. In 2012 a new Director of Football Governance and Regulation was appointed by the SFA. Shortly thereafter, by 2013 responsibility for safeguarding children and young people had transferred to this official from the HR Department. This lead almost directly to the creation of a new post of Child Wellbeing and Protection Manager within the Scottish FA.

3.6. In 2014 the post of Child Wellbeing and Protection Manager at the Scottish FA was created and an appointment made. This largely came about for two reasons: -

1. Because of the recognition by the Director of Football Governance and Regulation that safeguarding required increased and dedicated resourcing and
2. As a response to the recommendations of a commissioned audit carried out in 2014. This audit was mainly a ‘health check’ of the Scottish FA in relation to the Minimum Operating requirements for Safeguarding in Sport in Scotland and its’ compliance. The overall finding of the audit was that “There was evidence of some good/very good practice in the audit. There was also evidence of the Scottish FA needing to take action to be fully compliant with some of the MORs.”. The key questions addressed by the audit were: -
 - How are we currently doing in child protection in the Scottish FA?
 - How can we improve?
 - What are the recommendations for best practice?
 - How are we going to do it?

3.7. The recommendations of the audit appear to have been accepted and some were implemented (such as appointment of the Child Wellbeing and Protection Manager). However, it is evident that full implementation of all recommendations fell short and indeed some that

were acted upon since fell away – as a result of ‘drift’ concerning the implementation of some of the recommendations. It is apparent that the reasons for the variable momentum and direction in taking these forward include: -

- The work to be undertaken was considerable and probably too much for one person (the newly appointed Child Wellbeing and Protection Manager) to carry out and oversee
- No clear strategy was devised and no clear mechanisms put in place to monitor implementation and measure outcomes. In the opinion of the Independent Review the workplan of the post-holder does not constitute a strategic plan.
- The size and shape of Scottish football (its structure) diminished consistency and make it difficult to monitor and measure progress consistently and easily.
- The Scottish FA had limited control over what the constituent parts of football actually do. Its tendency to operate ‘reactively’ rather than proactively further restricted this.

3.8. The appointment of the Child Wellbeing and Protection Manager at the Scottish FA (along with one further post authorised soon afterwards) undoubtedly increased the pace of change and facilitated considerable improvements in the safeguarding of young people in Scottish football.

3.9. However, the Review notes that when dedicated ‘safeguarding’ posts are created or even when these responsibilities are ringfenced, **but** there is no context of strategic vision, accountability, and corporate ‘ownership’, compartmentalisation tends to occur. To an extent this is what occurred until 2018 in the Scottish FA and was repeated across Scottish football. That is, a tendency then to see safeguarding as the particular responsibility of the designated person rather than one which is shared across the organisation(s) and for which accountability is clear all the way from the bottom to the top (and vice versa).

3.10. Within the current organisational culture of Scottish football, the operational result is that protection and wellbeing activity and delivery has tended to be ‘hived off’ or separated from the world of football and seen somehow as an “add-on”, a supplementary obligation that is, to an extent, unrelated to core activity. This is the opposite from what the Review believes should be the case.....that protecting young people and promoting their wellbeing should lie *at the centre* of football activity and delivery across all domains where young people participate either as players, volunteers or spectators.

3.11. In the early stage of the Independent Review we were struck by the complex and confusing structure of the Scottish FA. In our efforts to clarify this and to determine how ANA’s and *other* parts of the structure understand and execute their role in relation to protecting young people our concerns were not significantly allayed.

3.12. Of course, the starting point in coming to our conclusions was that, if the structure of Scottish football appeared impenetrably complex for the Review how much more incomprehensible must it be for young people and their parents or indeed the Scottish public at large? During the Review it also became clear that many people *active within the game* – in fact the majority who contributed to the Review – also found the structure cumbersome, unaccountable and complex.

3.13. However, the Review also asked contributors (people active in various roles within Scottish football) what they think gets in the way of change from a protection and wellbeing point of view. Almost entirely the view was that some constituent parts of the structure are resistant to change because it means surrendering degrees of power and control.

3.14. The themes of *power and control* have particular resonance with the issue of child sexual abuse and with wellbeing and protection of young people in general. This is particularly so in an organisational system dominated by men and a culture often immersed in hypermasculine concerns. An observation by contributors given to the Review across the game (from grassroots to senior clubs, from recreational sport to elite performance) was the caricature of “men in blazers” who essentially appear to control much of what goes on and who often are perceived to act to impede progress or change. In this regard not much seemed to have noticeably changed in relation to the overall design and delivery of football as a system and as an institution since the events which were the focus of the Review.

3.15. This is not to say that, along the way, there has not been organisational change and some of it for the better. The recommendations of the McLeish Report (2010) and their implementation are an example although the Review has been unable to determine what mechanisms were put in place to consistently measure outcomes as a result of the sustained implementation of these recommendations. The Review is not primarily concerned with how this issue affects football as a whole (although we are not disinterested or disengaged from this as it is still inextricably connected to safeguarding young players). However, from a strictly protection and wellbeing viewpoint, the issues of *responsibility* and *accountability* are of the highest priority.

3.16. Systems and structures are not ‘detached’, operating separately from human thinking, endeavour, values and actions. *Structures and systems are made up of people* so, whilst it is tempting to refer issues of accountability to vague and detached “systems”, in fact accountability – like responsibility - lies with *people*.

3.17. Within Scottish football some individuals felt unable or disempowered to effect real and lasting change in relation to safeguarding issues. Some tried to do what they could (by being the right people in the right place at the right time) but found their efforts frustrated and impeded by a structure and a culture which were slow to respond, difficult to navigate and often self-protective. In the past, most change that has been attempted (to improve protection and wellbeing practice and capacity in Scottish football) has been “bottom up”. Much of it stalled unless it was related to statutory requirements or compliance issues where the negative consequences of failure to comply were patently clear and unequivocal.

3.18. By 2016 it had become apparent within the Scottish FA (to those engaged in delivering and progressing protection and wellbeing practice and policy) that the concerns that had been ongoing over recent years and which had contributed to the inertia in achieving the Minimum Operating Requirements had, at least in some key areas, continued.

3.19. Eventually however a more robust response by the Scottish FA was required to ensure that the protection of young people was prioritised among its membership, that minimum requirements were put in place and that compliance was consistent across Scottish football.

3.20. In October 2016 the Scottish FA issued a Directive to all ANA’s and clubs concerning a suite of basic measures to ensure consistency and delivery of safeguarding practice and provision. This included areas of policy, procedure, training, data sharing, named contacts and safeguarding officers, PVG, compliance, etc.

3.21. From 2013/14 the Review has seen what some leadership can do to bring about and escalate progress in protecting young people in Scottish football and hopes that this will continue and strengthen. The way forward, in our view, starts at the top.

3.22. The previous Chief Executive and, moreso, the current Chief Executive of the Scottish FA have demonstrated much needed leadership and commitment in relation to the wellbeing and

protection of young players and this has been particularly so since the publication of the recommendations of the Interim Report in 2018.

Governance

3.23. The Review has been interested in the degree to which, currently, the Board of the Scottish FA has been “engaged” with the issue of safeguarding prior to and since the current allegations leading to the Independent Review.

3.24. Safeguarding is a ‘high risk’ aspect of delivery of sports in Scotland. This is widely recognised. Failure to address this as a priority and to ensure that the protection of children and young people is paramount across all aspects of the sport places serious risks on the Scottish FA and its affiliates and members. This organisational risk is not to be taken lightly but nor should it imply that any measure to prioritise safeguarding is primarily with a view to protecting the organisation. All measures to bring about positive change at whatever level in the game is above anything about protecting children and young people from harm and not about organisational reputation. That needs to be made clear at all times and be evident in *what* is done and *how* it is done.

3.25. In a sport which is one of our largest national institutions with very large numbers of young participants and countless other young supporters and enthusiasts, the active interest of its governance in their protection, wellbeing, participation and contribution would be expected.

3.26. In a number of other Sports Governing Bodies, the Board appoints a non-executive director with the portfolio for safeguarding young people. Often this person will work closely with operational staff to develop the right strategies and oversee, from a governance point of view, implementation and measurement of achievement in this area of delivery. This has the effect of accomplishing two things: -

1. The exercise of due governance in an area of ‘high risk’ for the organisation through leadership and strategic direction and
2. Embedding safeguarding at the very top of the organisation - not as an add-on but as a key and vital aspect of sports delivery and overall accountability

3.27. The role of a non-executive director holding such a portfolio is not to overlap with operational roles and responsibilities but to ensure a working interface between strategy and governance.

RECOMMENDATION 7

Safeguarding of children and young people carries a high degree of ‘organisational risk’ and should therefore be a clear and priority aspect of governance within Scottish football. The SFA Board should therefore consider the need for:

- Appointing a Director with a portfolio lead for the safeguarding and wellbeing of young people
- Receiving and considering regular reports on safeguarding at all Board Meetings
- Reporting on safeguarding issues and improvements at Annual General Meetings

Progress since the Interim Recommendations of June 2018

The Review understands that the Chief Executive of the Scottish FA now holds these responsibilities on the Board. The CEO is a statutory Director of the Scottish FA and so is a full board member with the associated governance responsibilities.

3.28. It is also the view of the Independent Review that, in order to better exercise governance and accountability for safeguarding *across* the Board, existing Board members

should understand fully the high-risk nature of this aspect of football delivery and therefore the need for a collegiate approach to overseeing this issue towards embedding safeguarding within the overall culture of football in Scotland.

RECOMMENDATION 8

All Board Members should undertake targeted but comprehensive safeguarding training either retrospectively or as part of induction. Their ongoing needs for supplementary training and development should be included in the training and development pathway.

Progress since the Interim Recommendations of June 2018

The Review understands that as at March 2020 all Board Members have undertaken relevant training since 2018. Scottish FA Board members are now taken into account in the Learning and Development Framework.

3.29. The Independent Review recognises that the Board has a wide range of other considerations, responsibilities and tasks and that, in addition to training, it may benefit from ongoing support and advice.

3.30. We also recognise the benefit of this for wider Scottish football. We understand that in relation to its obligations in Equalities and Diversity, the Scottish FA has an Advisory Group acting to offer support, advice and guidance to the Board and the Scottish FA on relevant matters. The Independent Review thinks that this model brings important benefits to the improvement of wellbeing and protection practice and delivery in Scottish football and especially to the capacity of the Board.

RECOMMENDATION 9

The Scottish FA should take steps to establish an independent Safeguarding Advisory Board to both advise the Scottish FA and its constituents on safeguarding development, policy and strategy and to act as a mechanism for overseeing and monitoring the implementation of recommendations for continuous improvement.

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

It should also comprise members from outwith football and be chaired by a person independent of football with safeguarding expertise.

Progress since the Interim Recommendations of June 2018

An Independent Wellbeing and Protection Advisory Board was established in 2019 and met for the first time in April 2019 meeting quarterly thereafter. The Board is currently chaired by the Chief Executive of Children in Scotland.

3.31. The Review understands that, from 2017, the Scottish FA requested and received guidance from UNICEF further to its development of international learning sets (ILS) on safeguarding children in sport.

3.32. It was unclear to the Review where this sat in relation to the current workplan and structures for safeguarding in the Scottish FA. The purpose of support from UNICEF for the Scottish FA is also not clearly evident within any explicit strategy, plan or framework.

RECOMMENDATION 10

Concern exists as to the status and relevance of the ILS in relation to Scottish Football, specifically the relevance to Scottish legislation, social policy and organisations including the SIS standards. A review of this should be undertaken jointly between the SFA, the ANAs, Sportscotland and the Safeguarding in Sport Service (Children 1st).

Progress since Interim Recommendations of June 2018

The Review understands that this issue was reviewed throughout 2019 and a decision made to continue the group with a focus on ensuring sessions have practical value. The Review has been informed that updated Terms of Reference has been created and were approved in February 2020.

Accountability and structure

3.33. In Scottish football, as in other organisations and areas of life involving young people, clarity about who is answerable for their protection and ensuring their wellbeing is fundamentally important. Otherwise, why would young people or their parents, let alone the wider Scottish public, have any confidence that Scottish football has the best interests of young people at heart?

3.34. The Independent Review consistently found, from those working within football as well as from parents and other stakeholders, that accountability for protection and wellbeing within structural arrangements was sometimes unclear. Indeed, the Review had direct experience of one constituent part of Scottish football telling us that safeguarding is not its responsibility but that issue “belongs” to the Scottish FA. Irrespective of the extent to which any constituent part of football holds direct operational responsibility for young people, the Review finds it unacceptable that anyone involved in football organisation or delivery should see the protection of young people as someone else’s responsibility and not as something for which it has any accountability or interest.

3.35. The current organisational structure of Scottish football is such that lines of direct accountability are sometimes perhaps not as clear as they could be and that indeed in many places these are ‘shared’. Actually, as far as the Review could determine, these were sometimes not so much ‘shared’ as falling between two stools. Where there is any dubiety about who is answerable specifically or overall for the safeguarding of young people assumptions, conflict and duplication are immediately factored in and accountability is in danger of haemorrhaging out.

3.36. The structure and constitution of Scottish football needs to have simple, clear and recognisable lines of accountability for safeguarding young people. In the opinion of the Independent Review reform of the affiliate membership structure is required to bring this about. Indeed, this was a question put to almost every stakeholder operating within Scottish football and the Review has found that almost all of them have either suggested or supported this proposal in their contribution to the Review. Whether they would do so publicly and work to accomplish it remains to be seen.

3.37. Inconsistency is another aspect of a structure where the governing body often acts more to advise or guide rather than to govern. Such was the difficulty in implementing improvements in safeguarding throughout the early 2000’s and beyond it is abundantly clear that one constituent part of the game could pretty much do as it pleased with very limited control, or even influence, by the governing body.

3.38. During its information gathering phase the Review was unimpressed by the constant use of the term “light touch” by the Scottish FA about its role in relation to its constituents/members especially with regard to driving forward safeguarding practice and policy capable of improving protection of young people and reducing risk. The Review would prefer that more robust governance should be exercised by the governing body although the Review recognised that the affiliate membership structure perhaps acts against this. The sort of improvements in the protection of young people in Scottish football that are required need clear accountability, consistent leadership and a structure capable of delivering.

RECOMMENDATION 11

An urgent review of the Scottish FA affiliate membership structure should be undertaken with a view to reform. This should place centre-stage the need for lines of accountability to be clear, concise and transparent and demarcation of responsibilities in safeguarding of children and young people to be exact and clearly defined.

Progress since the Interim Recommendations of June 2018

The Review understands that this recommendation is now being led by a subgroup of the Scottish FA Board. Project work is also planned for late 2020 to look at governance in the non-professional game.

The Review has also been informed that the current Review of Scottish Women's Football is looking at the structure of the women's game.

3.39. The Scottish FA Handbook provides the Memorandum of Association and Articles of Association which govern the Associate Membership structure of the Scottish FA. Additionally, it contains a directory of clubs, associations and leagues; a list of referees; as well as protocols, competition rules, procedures for registration and anti-doping regulations.

3.40. The Review found little or no mention of the safeguarding of young people within the Scottish FA Handbook and views this as an inconsistency and a significant omission.

RECOMMENDATION 12

The Scottish FA Handbook should be updated to include a section on the wellbeing and protection of children and young people containing the requirements related to standards and required compliance.

The contact details of CWPO's in clubs, ANA's and the Scottish FA should also be included within lists currently provided within the Handbook.

Progress since the Interim Recommendations of June 2018

The Review understands that the 2019-20 Scottish FA Handbook contains contact details for club Child Wellbeing and Protection Officers. The Club Licensing Manual, revised annually, sets out the standards that member clubs must adhere to.

3.41. It is the view of the Independent Review that now, as in the past, the degree to which Scottish football can improve and embed good protection and wellbeing practices and processes within delivery (thus addressing the needs of young people) now depends, as it did in the past, on good visible and sustained leadership on this issue.

3.42. The development of the history of safeguarding (child protection) within Scottish football has often been a matter of default rather than design. As said elsewhere in this report improvements, innovation and progress in safeguarding were often a matter of the right person being in the right place at the right time. We recognise that the Scottish FA, between 2014 and 2018, started to move beyond this and indeed demonstrated some accomplishments. This is highly commendable. However, we also recognise that this was mainly on the initiative of individuals rather than a product of any coherent *plan*.

3.43. Indeed, it surprised the Review that no Safeguarding Strategy had been developed and put in place. Other than the workplan of the Child Wellbeing and Protection Manager the Scottish FA had no recognisable framework for planning the way forward or measuring success. It was our view that this needed to be remedied urgently and that the responsibility for this lay with the Board of the Scottish FA along with senior officers.

3.44. But the Strategy needs to go beyond the recommendations of this Report and cannot simply be a rehash of these. The Strategy requires a vision of where Scottish football needs to be in relation to safeguarding young people and embedding safeguarding practice within all parts and at all levels of the game. It also needs to set out *how* that vision is to be achieved and the timescales expected for this and to galvanise all parts of Scottish football. All of this needs to be articulated with a focus on the desired *outcomes* so that these form the basis for ongoing monitoring, measurement and reporting.

RECOMMENDATION 13

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

In the first instance a 5-year strategy for the wellbeing and protection of children and young people should be put in place covering all aspects of delivery and improvement and clear timescales for achievement of goals, objectives and outcomes.

The Strategy should be developed by all constituents in Scottish football along with the Scottish FA and include the participation of young people and external partners. Accountability for the strategy should lie with the SFA and its Board as the governing body.

Progress since the Interim Recommendations of June 2018

The Strategy was published in August 2019 and is now available on the Scottish FA website. There are three phases for implementation - Build & Launch; Connect & Implement; and Monitor & Evaluate. Annual Implementation Plans have been devised to track the progress of implementation.

3.45. The Review is impressed with the approach taken, since 2018, by the Scottish FA and its members in developing this Strategy and with the content, breadth and ambition of the Strategy that has been agreed. Continued “buy in” is of course vital if the Strategy is to accomplish the outcomes it has articulated.

3.46. The Review recognises that leadership is about much more than what happens centrally or “at the top”. Leadership involves example and across Scottish football there are already many instances of people who are trying to improve protection and wellbeing delivery through their own example. This needs to be harnessed and act to propel and sustain future positive change. The Review commends this and hopes that a culture of leadership through example also forms an important backdrop to progressing the protection of young people in Scottish football.

3.47. This is a vital aspect of achieving and retaining 'buy-in' (commitment, motivation and cooperation) across Scottish football. We have seen how lack of buy-in has impeded progress and at times allowed poor practices to survive leading to greater potential risk to young people. Embedding good safeguarding practices and the wellbeing of young people within Scottish football at all levels and in all parts is essential, and this has been an important message given to the Review from those working inside football and from external stakeholders.

RECOMMENDATION 14

To accompany the 5-year strategy, a communication strategy should be developed and put in place to ensure buy-in and the full commitment and participation of everyone involved in the game.

Progress since the Interim Recommendations of June 2018

The Review has been informed that the development of a Communications Plan and an agreed approach to communications linked to the Strategy is a priority for 2020.

3.48. Positive and resilient leadership in relation to cultural change within football is fundamental and there are some very significant challenges to bringing about the extent and degree of cultural change necessary to make the Scottish game safe and inclusive, across the board, for young participants, volunteers, and spectators. The Independent Review does not underestimate the extent or the nature of the challenge.

Dedicated resources and investment in safeguarding

3.49. The implementation of a Strategy and the achievement of outcomes cannot come about without resources. Similarly, the vitally important 'cultural' changes also require resources of all types.

3.50. The Independent Review acknowledges that the deployment of resources needs to be proportionate to need. However, it also needs to be commensurate with the strategic objectives and outcomes that are identified. It is simply not good enough to accede that a failure to achieve outcomes or goals has been because insufficient resources were made available to bring this about - but we recognise that this often happens where funds are in short supply and there are a range of competing demands.

3.51. The Review re-iterates that the protection and wellbeing of young people is not an 'add-on' to core activity. Neither is it something of relative or variable importance. It is *central* to the delivery of football in Scotland and to the future of the game. As we have reported in Section One of this Report the price that individuals have had to pay in the past is too great to see it otherwise and this should not be minimised or overlooked.

3.52. The need to create resources adequate to undertake the job in hand is evident.

3.53. Currently the Scottish FA has a small section staffed to undertake safeguarding work on its behalf. This section was part of the Operations Department of the SFA and line-managed by the Head of Football Governance within that department. The section was overseen and managed on a day-to-day basis by the Child Wellbeing and Protection Manager (CWPO). At the time of the Interim Report (2018) the Review understood that work was underway to securing temporary staff as permanent appointments. The Review supported this development and was of the view that deployment at that time was inadequate, in the longer term, to meet the requirements of safeguarding within the Scottish FA and needed to be enhanced.

RECOMMENDATION 15

The Scottish FA wellbeing and protection capacity should be subject to increased and improved investment and resourcing on a longer-term basis. This should include an expansion of current staffing and resources. The Review recommends that the Scottish FA conduct a comprehensive review of the desired and appropriate roles and tasks of the safeguarding team based on desired outcomes and the content of the 5 Year Strategy including:

- Young people's participation and children's rights
- Training and development
- Compliance/quality assurance and evaluation
- Policy
- Consultation and support for affiliates, clubs and members

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

Progress since the Interim Recommendations of June 2018

The Review has been informed that a core staff team was put in place as of March 2019. Since the publication of the Interim Report four pre-existing temporary roles have been made permanent and a further part-time role has been added. Further roles are under consideration potentially to regionalise the resource and its structure.

3.54. The question also arose as to whether the wellbeing and protection staff within the Scottish FA could operate and deliver best as a section within an already large and varied department. The Review was of the opinion that this needed to be looked at carefully when and as decisions about resourcing were taken. This consideration included the need for a Safeguarding Department to be created reporting to the Chief Executive and, through her/him, to the Board. The English FA currently spreads different aspects of safeguarding responsibility across departments within it. The Review did not believe this to be a suitable arrangement for the Scottish FA *at this stage* but the Review is of the view that consideration should be given to a structural model that best suits the needs of young people in Scottish football taking fully into account the issues raised elsewhere in this Report.

RECOMMENDATION 16

Consideration should be given to greater prominence and effectiveness to the Child Wellbeing and Protection Team in the Scottish FA. This should include consideration of creating and tasking a Wellbeing and Protection Department within the Scottish FA headed by a Head of Department.

Progress since the Interim Recommendations of June 2018

The Review has been informed that a new Scottish FA Wellbeing and Protection Department was created from 1 January 2019 with a Head of Wellbeing and Protection reporting directly to the Chief Executive. A core permanent staff team was in place as of March 2019.

Investment and commercial sponsorship

3.55. It is recognised that expansion of the Safeguarding and Wellbeing team and achieving the necessary improvements to safeguard young people cannot be done without adequate

funding (long term) which is ring-fenced and targeted towards this. We are well aware that the issue of identifying funding and improving investment for safeguarding is closely linked to other changes recommended in this Report – for example reform of the Affiliated Membership structure which might free up money or reconfigure how funds are raised and allocated.

3.56. The Independent Review was also aware that Government funding (through SportScotland) by far does not comprise the “lions share” of investment in the Scottish FA. The contribution of sponsorship and commercial investment is considerably more substantial. We however do not see a total distinction between safeguarding issues and commercial investment and sponsorship – that somehow the commercial enterprise of today’s game is all about “hard cash” (underpinning performance and sporting achievement) and therefore unrelated to other vital aspects of delivering football and sustaining the sport in Scotland. Commercial thinking and investment strategy needs to take account of this in attracting future investment and dispersing/deploying funds.

3.57. In other words, there is an *ethical* dimension to investment and sponsorship that cannot and should not be ignored - either by those within football engaged in attracting sponsorship and investment or by potential or actual commercial sponsors themselves.

3.58. The Review takes a strong view that failure to improve the capacity of *ALL* of Scottish football to protect and safeguard young people should have investment consequences. We are minded that commercial investors should be alert to this. The Independent Review would urge all potential investors to seriously consider these issues as part of examining investment conditions and ensure that these are included in fulfilling their agenda for ethical and social responsibility.

RECOMMENDATION 17

Commercial sponsors should be made alert to wellbeing and protection issues and arrangements in the Scottish FA, ANA's and Clubs as part of their ethical and social responsibility agenda concerning investment and sponsorship. As such any activity to attract sponsorship, investment and funding should factor in the efforts and achievements of Scottish football in ensuring the wellbeing and protection of young people in all aspects of the game to reinforce investor confidence.

Progress since the Interim Recommendations of June 2018

The Review understands that this recommendation will be considered for inclusion in the 2022 planning cycle.

3.59. Allegations of non-recent sexual abuse in Scottish football has scandalised the world of football and the wider Scottish public. Confidence in the game and its organisation has understandably been damaged. This will also not have escaped commercial sponsors. Efforts to singularly and genuinely improve the protection and participation of young people may in part act to restore public and commercial confidence. Without this the Review would question why commercial sponsors would wish to invest in a game which has not proven itself consistently dedicated and motivated to protect its young players.

Standards and evaluation (quality assurance)

3.60. If Scottish football is going to continue to move forward in relation to protecting young people and reducing risk it is vital that it develops tools and frameworks capable of measuring progress and outcomes.

3.61. This should be considered and put in place as part of the development and implementation of a Child wellbeing and Protection Strategy for Scottish football.

3.62. In the opinion of the Review the Child Wellbeing and Protection in Sport Service 'Standards for Child Wellbeing and Protection in Sport' developed by Children 1st in partnership with SportsScotland provide a robust basis for developing a regime capable of measuring progress in wellbeing and protection in Scottish football.

3.63. The Standards are the next stage of the previous Minimum Operating Requirements moving to articulate these as standards for delivery rather than minimum requirements. As such they are significantly more robust and exact but also make it more incumbent on Sports Governing Bodies to demonstrate and evidence the achievement of these standards through their actions, delivery and outcomes.

3.64. Through a commitment to meeting the Standards Scottish football will be required to evidence much of the implementation of its Wellbeing and Protection Strategy and do so in consistent and systematic way.

RECOMMENDATION 18

The Review recommends that the 'Standards for Child Wellbeing and Protection in Sport' are embedded into a Wellbeing and Protection Strategy for Scottish Football with a view to ensuring that any achievement and progress is measured against the Standards on an ongoing basis.

Progress since the Interim Recommendations of June 2018

The SportScotland standards are now embedded in the Scottish FA Child Wellbeing and Protection Strategy. The Scottish FA reports on organisational progress to SportScotland. Furthermore the Review has been informed that the Standards are now embedded into ANA Wellbeing and Protection Audits as of 2019 and will be embedded in Member Club Licensing from 2020.

3.65. The issue of 'buy-in' is vital to achieving standards and measuring continuous improvement particularly across the diverse landscape of Scottish football.

3.66. The Review finds that, in order to establish and maintain commitment, a regime of 'self-evaluation' by clubs and other parts of Scottish football will assist both the Scottish FA as the governing body and others responsible for the delivery of football.

3.67. The process of self-evaluation is already built in to existing safeguarding processes in clubs and ANA's. When any situation of concern is managed it is normal for clubs to follow this up by looking internally at *how* they handled it, whether this was effective (or not) and what lessons can be learned in order to improve. This is an aspect of self-evaluation. However, the Review has learned that this process was variably used across football clubs and that this is not always undertaken following every concern that has been dealt with.

RECOMMENDATION 19

All 'managing concerns' reviews should be undertaken after **every** concern case as part of a self-evaluation process within each club. The results of each review should be communicated to the Scottish FA who should hold responsibility for analysing these and integrating them into an overall assessment of wellbeing and protection practice and improvements.

Progress since the Interim Recommendations of June 2018

The Review has been informed that the updated policy includes Case Review Procedure including setting out the criteria for the review of cases and when it would be appropriate to have a case reviewed externally. Further work will be undertaken in terms of the interaction between clubs and the Scottish FA when reviews are undertaken and this will be considered as part of 2021 and 2022 planning cycle.

Training and Development

3.68. The Review has found a wide range of issues concerning the organisation and delivery of training and development on wellbeing and protection of young people in Scottish football. A significant number of contributors and stakeholders have provided views on training and whether it meets current and future requirements.

3.69. The changes which are required to ensure young people are protected and risks reduced need to be underpinned by good, effective and proportionate training and by continuous development for staff, volunteers, players and anyone engaged in the delivery of football in Scotland.

3.70. The Review considers that the Scottish FA needs to address the child protection and wellbeing training and development needs of all of Scottish football in a systematic and strategic way.

3.71. Training does not exist for its own sake. It should also not be viewed as a ‘box-ticking’ exercise dominated by number crunching. Training is first and foremost about *change*. Training is necessary to change the way people *think* and the way they *behave*. This is why it is so important to improving the protection of young people in Scottish football and reducing risk.

RECOMMENDATION 20

A Child Wellbeing and Protection Training and Development Strategy for all of Scottish Football should be developed jointly between the Scottish FA; ANA's; Clubs (Professional & Grass Roots); and involve external partners such as Children 1st and Sportscotland.

Progress since the Interim Recommendations of June 2018

This is now included as a strategic priority within the Child Wellbeing and Protection Strategy. A new Learning and Development Framework was due to be consulted on in the first quarter of 2020.

3.72. If the delivery of training is about *change* then it requires a robust system (of quality assurance) to measure the extent to which this change has been achieved and embedded and to ensure that improvement is continuous.

3.73. Quality assurance is not simply about the *quality* of training....it is about setting desired outcomes and measuring whether what has been delivered to achieve these outcomes has been effective or not (and doing it differently if the desired outcomes aren't evidenced).

RECOMMENDATION 21

A Training and Development Quality Assurance system for wellbeing and protection should be developed and implemented which ensures that training and development programmes have positive outcomes in the continuous improvement of safeguarding in Scottish football.

Progress since the Interim Recommendations of June 2018

The Review understands that a Learning and Development Quality Assurance System will be launched in 2020.

3.74. If a clear Training and Development Strategy is put in place and accompanied by good measurement of outcomes then a more systematic way of delivering training which is cost-effective, proportionate and measurable will be in place across Scottish football. This needs to be consistent and complement other areas of development and delivery.

3.75. The Review believes that the best way to tackle this is through a clear pathway for safeguarding training and development which is available to and touches everyone engaged in Scottish football across all levels and roles from governance to grassroots, from senior professional clubs to the recreational game, from specialist posts to general employees, volunteers, parents and spectators.

RECOMMENDATION 22

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

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

Progress since the Interim Recommendations of June 2018

The Review understands that this will form part of the Learning and Development Framework to be consulted on in 2020.

3.76. No person entering football should be in any doubt as to their responsibilities to safeguard young players and to respond to the wellbeing of others in the game whether as young people or as adults. This means that the point of induction is a key to engaging all newcomers with the values and requirements of football to protect young people and reduce risk.

RECOMMENDATION 23

All induction for staff/volunteers/board/management and players across Scottish football should include input on safeguarding (as reflected in the Training Pathway at an appropriate and proportionate level).

Progress since the Interim Recommendations of June 2018

The Review understand that the Scottish Football Working Group (SFWG) have created a Recruitment and Selection Toolkit which includes induction and which is to be published in the first half of 2020.

All Scottish FA staff undertake child wellbeing and protection training as part of induction and participate in refresher training.

Partnership with parents

3.77. The matters considered by the Review and which are addressed in Section One indicate a serious concern about the risk to young people who may be ‘groomed’ or desensitised in relation to potential sexual abuse or exploitation.

3.78. The Review understands that for responsibilities to be exercised properly in Scottish football a working partnership or alliance is required with others who have responsibility for young players especially their parents or caregivers.

3.79. To support the development of such partnership and to maintain a common understanding of the issues that young players may face the review believes the Scottish FA and clubs have an important contribution to make. This can be progressed by the Scottish FA and clubs and other constituent parts of football being open to parents and working closely with them to endure the wellbeing and protection of young people. Information and discussion can facilitate good communication and common understanding which will strengthen any measures put in place to protect young people or reduce risk.

RECOMMENDATION 24

The Scottish FA in conjunction with clubs and others should develop or provide a proportionate programme of awareness for parents and caregivers about how sexual abuse or exploitation occurs and how grooming might be carried out including how parents and adult bystanders might also be groomed. Such awareness should be proportionate, informed and accessible and form an important focus for partnership and good communication between the Scottish FA, clubs and parents/caregivers.

Progress since the Interim Recommendations of June 2018

The Review has been informed that this will be considered as part of the 2021 planning cycle.

Policies and Procedures

3.80. The Review spent some time examining child protection/safeguarding and associated policies across Scottish football.

3.81. This was a daunting task for a number of reasons not the least of which was the proliferation of policies and procedures in place.

3.82. Despite this the Review was given the impression across Scottish football that, often (but not always), in the recent past the development and creation of policies and procedures was mainly a ‘box ticking’ exercise. In other words, there was a strong sense that this had been undertaken because it was seen as ‘required’ rather than the policies and procedures being living documents with any direct relevance to the club or organisation or to its actual delivery.

3.83. The Review understands that this mindset is not unique to football. Where policies and procedures are approached as a strictly ‘*compliance*’ issue (done because the organisation *has* to rather than sees the need to) this is bound to happen and is exacerbated in an organisational culture that has not embedded the protection and wellbeing of young people successfully.

3.84. It is our view that the ‘ownership’ of club policies and processes on the protection of young people and the reduction of risk should be immediate, clear, and obvious. This has to start with the governance and management of any club making clear statements that the policies and procedures form part of a commitment at all levels of a club to ensure the protection of young people and the reduction of risk.

3.85. The Review recognises that some clubs have put in place policies that are unequivocal in that the CEO and/or Board have declared a firm commitment to the protection of young people. This demonstrates a sense of leadership, good governance and ‘ownership’ on the part of the Club.

RECOMMENDATION 25

All club protection and wellbeing policies should have an introduction from CEO/Board Chair or both.

Progress since the Interim Recommendations of June 2018

The Review understands that this now forms part of club licensing audits for member clubs.

3.86. There was considerable evidence of a widespread ‘cut and paste’ approach to developing club child protection and wellbeing policies. This was the most obvious indicator of these being general regarded as a ‘box ticking’ exercise. Indeed, from some of the policies which the Review examined it was evident that these hadn’t even been proof read by those either developing the policy or signing it off since they often contained titles and references that showed that the policy originated elsewhere and had simply been cut and pasted and rebranded on the front cover. This is not acceptable since it suggests a lack of consideration and commitment on the part of the club to the protection of young people.

3.87. The Review understands that often template policies are made available by the Governing Body and others to reduce effort and achieve consistency. The Review thinks that this is both appropriate and desirable. However, where this is done there needs to be better compliance measures put in place (both by the Scottish FA and by clubs) to ensure that such policies are genuinely bespoke to clubs. Where the core standards and requirements are consistent it does not imply that every club policy needs to look exactly the same.

RECOMMENDATION 26

Clubs should not simply adopt and rebrand the Scottish FA Wellbeing and Protection Handbook or any other template policy or procedure without doing more to ensure it is integrated into the identity and delivery of the club itself. There is a need for clubs and organisations to ‘bespoke’ policies to their individual clubs needs and conditions without compromising the consistency of core requirements across Scottish football. The Review recommends that all clubs and organisations revisit their documents and policies to ensure that the structure and identity of their club is clear and consistent throughout with the branding and ownership of the policy clear in their presentation and the delivery. All such policies and procedures should clearly reflect the vision and values of the particular club and its community.

Progress since the Interim Recommendations of June 2018

The Review has been informed that a new policy framework has been designed to allow Clubs to bespoke their policy to suit their organisation and its structure within a universal framework so that consistency across Scottish football is maintained. This policy framework will be rolled out during 2020.

3.88. The Review found an amount of confusion arising from different terms being used for the same thing in child protection and wellbeing policies and procedures across Scottish football. In the Interim Report the Review advised the Scottish FA to examine this and arrive at a set of common terms that are universally understood within football and commonly applied in all policies and procedures

RECOMMENDATION 27

To prevent confusion and promote consistency all safeguarding policies should be known by the same title across all clubs and organisations.

Progress since the Interim Recommendations of June 2018

The Review understands that this was implemented through Club Licensing for member clubs in 2018 and through Wellbeing and Protection audits for the ANAs from 2019.

3.89. The Review is aware that terminology often changes and that it can often be used without true regard to its meaning. This is especially so in respect of the wellbeing and protection of young people where interchangeable terms are often used to mean the same or similar things. Terms such as ‘child protection’, ‘safeguarding’ and ‘wellbeing’ are commonly used without a real sense of what they mean or why they are used differently. For the *activity* of protecting young people to be meaningful and for people to feel connected to it the Review takes the view that people should be encouraged to use the same terms to mean the same things and should never be unsure of that is meant.

RECOMMENDATION 28

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

Progress since the Interim Recommendations of June 2018

The Review understands that this has been considered as part of the review of the Scottish FA's policy on the Wellbeing and Protection of Children and Young People in Scottish football. This is awaiting approval and thereafter will be rolled out to members during 2020 with all members having reviewed their policies by 31 December 2020.

3.90. It was also of concern that different clubs had used different definitions within their policies and this was especially so when there was no clear and consistent use of the word ‘child’. In some clubs’ policies this term still applied to anyone under the age of 16 years while in others it had been amended to anyone under the age of 18 years.

3.91. Most people are aware that the term is normally defined (now) as applying to anyone under the age of 18 years of age and this needs to be reflected in club and organisations policies and in their arrangements and practices. Similarly, the Review found that club policies often lacked clarity about how abuse (particularly sexual abuse) occurs within sport and in football in particular.

RECOMMENDATION 29

The definition of ‘child’ should be clarified and consistent across all wellbeing and protection policies and processes in Scottish football.

Progress since the Interim Recommendations of June 2018

The Review has been informed that this was implemented through Club Licensing for member clubs in 2018 and Wellbeing and Protection Audits for the ANAs as of 2019.

3.92. In Section One of this Report it is clear that all the situations of sexual abuse or alleged sexual abuse that were considered (and about which we received accounts) took place within

the context of a relationship between a trusted adult and a young person. This particularly involved coaching, scouting, and physio/sports therapy.

3.93. The Review believes that all policies should address this issue more effectively and clearly. In doing so there needs to be a sharp consistency across Codes of Practice for a range of roles and child wellbeing and protection policies.

3.94. The Review found that where these issues were addressed (in part) within policies there was no clear reference to or understanding of the legal provision regarding abuse within relationships of trust. While the legal provision itself might not apply directly to sports relationships the Review believes that the general principles and definitions of the legislation should be used as the basis for guidance and club policy.

RECOMMENDATION 30

The Scottish FA should refer to the spirit of the 'relationships and position of trust' legislation with a view to broadening the 'relationships' definition within organisation and club policies and handbooks. Clubs, with the assistance of the Scottish FA, should also ensure that this is reflected in Codes of Conduct for particular roles.

Progress since the Interim Recommendations of June 2018

The Review has been advised that the new policy framework includes a practice note on "Relationships" which includes a description of 'positions of trust'.

3.95. With many club policies and procedures, the Review found that it was not always clear that these applied to **all** young people under the auspices of the club (e.g. mascots, ballboys and girls, young volunteers, and young spectators) and not just young players. Indeed, the Review believes that this is because the implementation of these policies has not been fully thought through and therefore the club has not adequately considered the extent to which these policies apply. This needs to be made clear in all policies and statements including those entered on club websites or social media sites.

RECOMMENDATION 31

Club Policies and Procedures should directly and explicitly make clear that they apply to **all** children and young people participating in club activities and delivery in any way, not just young players.

Progress since the Interim Recommendations of June 2018

The Review understands that this has been considered as part of the review of the Scottish FA's policy on the Wellbeing and Protection of Children and Young People in Scottish Football. This is awaiting approval and thereafter will be rolled out to members during 2020 with all members having reviewed their policies by 31 December 2020.

3.96. The Review has found that the focus on young players has had the effect of narrowing the perceived obligations of clubs to protecting children and young people and reducing risk. The Review is aware of the risks that face any young person participating in or attending club events including matches and believes that all this should be reflected in the policies and procedures of all clubs especially with regard to young spectators.

3.97. The core part of many procedures referred to the 'management of concerns' yet the Review found that these procedures were not always presented with clarity and ease of access within club policies. In many they appeared wordy, complex and confusing. While these procedures might have made sense to those with specialist roles they sometimes did not make sense to other readers and users.

3.98. The Scottish FA in conjunction with clubs should make sure that this is the case so that such procedures are not misunderstood or daunting. Similarly, all processes supporting these procedures should be straightforward and as easy to apply as possible.

RECOMMENDATION 32

Reporting and management of concerns processes should be standard, simple, and clearly set out in all Wellbeing and Protection Policies.

Progress since the Interim Recommendations of June 2018

The Review understands that this has been considered as part of the review of the Scottish FA's policy on the Wellbeing and Protection of Children and Young People in Scottish Football. This is awaiting approval and thereafter will be rolled out to members during 2020 with all members having reviewed their policies by 31 December 2020.

3.99. Similarly, the Review found that club and organisations policies themselves were quite unwieldy and inaccessible to anyone with an interest in safeguarding – this includes parents and any supporter or member of the club family who wished to satisfy themselves that safeguarding measures were acceptable or who wished to find out how they should communicate concerns, opinions or complaints.

3.100. It is incumbent on clubs and organisations within Scottish football to make these policies as accessible as possible to people within the club/organisation and the general public. Nobody should find accessing or navigating safeguarding information difficult or daunting.

3.101. Some clubs have contained a plethora of information within one handbook or policy including forms and technical material for use internally.

3.102. The Review also believes that safe recruitment packs should be stand-alone partly to reduce the burden on the general safeguarding policies but also to make these easier to distribute and use.

RECOMMENDATION 33

Consideration should be given to making club and organisations wellbeing and protection policies/handbooks as user-friendly as possible - this should include separating out recruitment materials (e.g. codes of conduct; application forms etc) from the core handbook.

Progress since the Interim Recommendations of June 2018

The Review has been informed that close attention has been paid to the structure and accessibility of new policy framework. Proposed new Club Academy Scotland (CAS) criteria from 2021 requires CAS Clubs to adopt 'parent' Club policy.

3.103. Where clubs have Football Academies operating within or attached to them it is important, in the opinion of the Review, that the arrangements and policies of the Academy in relation to the protection of young people and reduction of risk should be covered by the policies and processes of the 'parent club'. In other words, the child wellbeing and protection

policies of Football Academies should not stand separately from the policies of the senior club but be seamlessly aligned with them. This creates a degree of corpocracy and overarching governance that is important so that overall accountability is clear and easy to understand.

RECOMMENDATION 34

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

Progress since the Interim Recommendations of June 2018

The Review has been informed that close attention has been paid to the structure and accessibility of new policy framework. Proposed new CAS criteria from 2021 requires CAS Clubs to adopt 'parent' Club policy.

3.104. The Review was encouraged to find that on a couple of occasions senior clubs affected by allegations or confronted with risk later undertook internal enquiries ostensibly to ensure how and whether the club had discharged its responsibilities and had not put young people at risk in doing so. However, it was clear that when this happened the club itself decided and pursued its own terms of reference for such a review without any degree of independence or scrutiny being built in or without making clear what arrangements would be in place for how lessons from any findings to be applied or shared.

3.105. In future this might be a practice that clubs should follow automatically not just in relation to current concerns or allegations but, indeed, to non-recent allegations that are reported and what the club did or did not do to identify or prevent risk to young people.

RECOMMENDATION 35

Consideration should be given to the development of a template or standard 'Terms of Reference' to assist any club who may wish to embark on internal review related to specific wellbeing and protection concerns or allegations whether recent or non-recent.

Progress since the Interim Recommendations of June 2018

The Review has been advised that this will be considered as part of the 2022 planning cycle.

3.106. To our dismay the Review found a number of club "safeguarding" policies that either referred to or had headings like "*Protecting Yourself Against Allegations of Abuse*". This should be remedied immediately as it is completely inconsistent with the principles and standards of protecting young people and reducing risk.

3.107. The Review understands from the content of these policies that actually they are intended to convey how staff should acquit themselves in an open, transparent and accountable way. Therefore, the title of these policies should reflect the content and the intention.

RECOMMENDATION 36

No section in any policy should be titled '*Protecting Yourself from Allegations of Abuse*'. Where this is the case this should be remedied immediately by clubs and organisations. The Review recommends that the term 'Safe Working Practices' is adopted instead and that the content of such policies is made consistent with this term.

Progress since the Interim Recommendations

The Review has been advised that any policy now containing such terminology is reported to Club Licensing as 'non-compliant'.

Online conduct and social media

3.108. The Review is encouraged to see that current concerns are increasing about online and social media conduct and this is being incorporated into club and organisation child protection and wellbeing policies in Scottish football. However, this was an uneven picture.

3.109. The Review saw some good practice by some clubs in responding to the challenges of social media and how it can be used to increase risks to young people. This includes carefully restricting and managing the online and social media communications between adults and young people in Scottish football without losing the benefits of social media platforms in assisting communication and sharing club information.

3.110. The Review is also conscious of the ways in which social media platforms and devices can be used between young people both positively and negatively and understands the challenge to all areas working with young people in helping them to use communication technology safely.

3.111. The Review believes that this issue should no longer be viewed as something 'new' or outside of the mainstream of safeguarding practice and policy in Scottish football.

RECOMMENDATION 37

The protection of children and young people online and the use of social media should be included and embedded in club and organisations wellbeing and protection policies across Scottish football.

Progress since the Interim Recommendations of June 2018

The Review understands that the revised policy contains a Practice Note on Communication and Social Media.

3.112. The Review believes that the online and social media conduct of all adults in Scottish football in relation to young players should be subject to clear standards and expectations by clubs and organisations.

RECOMMENDATION 38

Standards of expected behaviour on social media should be included and clear requirements set in all *codes of conduct* at all levels in football including in the professional game and including communication by club players and staff with young people outside of football.

Progress since the Interim Recommendations of June 2018

The Review understands that this now forms part of the 2018 Code of Conduct and has been updated for the 2020 revised policy.

3.113. For Football Academies and Youth Football the Review recognises that even more detailed guidance on social media etc might be a positive advantage and support efforts to reduce risk. The sheer volume of young people participating and the special conditions this issue creates place considerable pressure on the Academies/Clubs to oversee their protection and wellbeing. Establishing and maintaining clear boundaries and safeguards on interactions and communication through social media etc reflects the commitment of the club or organisation to protect young people and reduce risk wherever and however it might occur within Scottish football.

RECOMMENDATION 39

'Stand-alone' social media safe practices and guidance for Academies and Youth Football should be developed and put in place.

Progress since the Interim Recommendations of June 2018

The Review has been advised that this will be considered as part of the 2021 planning cycle.

3.114. The Review considered the expectations and rules in place governing the communication between adults and young people in Scottish football especially where this involves electronic communication and social media platforms. Variable practice and guidance was in place across clubs and the Review concludes that this needs to be streamlined and made consistent across Scottish football. Furthermore, senior professional clubs also need to be clear about any code of conduct expected of young adult players using open social media in communicating about any aspect of their lives not only that which is directly football related.

3.115. The Review was encouraged by some examples of good practice by clubs to regulate communication within the club between coaches and staff and young players. It is important that innovative ways are looked at and piloted to make sure that communication is always effective yet safe. For example, the Review considers it good practice that coaches do not hold the personal mobile numbers of young players on their own phones where use of this might occur privately and without proper scrutiny. The possibilities of abuse are obvious where the boundaries between personal issues are blurred with those issues concerning club football. The Review believes that there are creative technical options available which might be developed by clubs for ease of access between coaches/staff and young players but which do not compromise the protection of young people.

3.116. The Review considered information concerning sexually abusive behaviour which included the taking of photographs of young people. Furthermore, we have become aware of the increasing practice of using video assisted medium to assess young players and observe their training and physical performance.

3.117. The Review understands that all clubs take their obligations to use such methods with young people carefully and sensitively. However, we are also of the view that consistent practices and standards should apply across Scottish football and believe that these require to be developed and put in place.

3.118. To enable Scottish football to achieve this it is important to establish the extent of and arrangements for the use of visual recording or observation with the training and performance assessment of young players. This should also include current arrangements for consent and storage of still photographs as well as visual recordings of young players.

RECOMMENDATION 40

The Scottish FA should conduct a review of the arrangements for photography, visual recording and video analysis concerning young players in all settings across Scottish

Football including the regulation and monitoring of this and the use and storage of photographic/recorded images of young players with a view to developing and putting in place consistent standards and practices.

Progress since the Interim Recommendations of June 2018

The Review understands that the revised policy has a Practice Note on Photography and Filming. The Review is also advised that the Scottish Football Working Group has established a working group for safe use of images and will deliver operational work in 2020.

Risk assessment and recruitment

3.119. The Review found that a number of clubs (at all levels) and organisations had put in place mechanisms for considering risk including examining and processing 'blemished' Disclosure returns. We take the view that such a mechanism is necessary across all clubs and organisations through which young people participate. Processing and understanding information from PVG checks requires careful consideration and the Review takes the view that this should be done by people that have both the knowledge and the confidence to assess this information and make recommendations or decisions.

3.120. Furthermore, the Review found that there was widespread confusion in Scottish football about how many roles within football 'fit' within the definition of 'regulated work' in the PVG legislation. Those charged with wellbeing and protection responsibilities at club level frequently have found this complicated and difficult terrain to navigate.

3.121. The Review has been told of numerous examples of clubs who wish to undertake checks on particular applicants mainly to satisfy due diligence but the role is not covered by the PVG legislation (regulated work). It is unacceptable for people with responsibility for recruitment or safeguarding in football to have to see it as necessary to rewrite role descriptors so that these 'fit' with the definition of regulated work. The Review has discovered that this has been a fairly common occurrence. If the aim of PVG is to protect young people and to reduce risk then the interface between football and PVG/Disclosure should be as simple and smooth as possible so that all checking processes and requirements are fit for purpose in relation to the modern game and all its requirements.

RECOMMENDATION 41

The SFA should draw up guidance on risk assessment (Including processing blemished PVG reports) for all clubs and covering the makeup, responsibilities and expertise/training of risk assessment panels.

Progress since the Interim Recommendations of June 2018

The Review has been informed that the current review of the Scottish FA Safeguarding Panel Guidance was due to be completed in the first half of 2020 thereafter it will be shared as a template for members. The revised policy also covers risk assessment.

RECOMMENDATION 42

Consideration should be given to centralising Risk Assessment functions on behalf of clubs and ANAs including referral to the List; critical cases; liaison with investigatory authorities; and developing a single 'clearing house' /process discernment for all blemished disclosures and cases of concern through a single, central system/mechanism invested

with the right expertise and supported by procedures and processes that are proportionate and fit for purpose.

Progress since the Interim Recommendations of June 2018

The Review is advised that this will be considered as part of the 2022 planning cycle.

RECOMMENDATION 43

Consideration should be given to grassroots football clubs *sharing* risk assessment capacity, perhaps on a district/regional basis as part of the consideration of centralising these functions.

Progress since the Interim Recommendations of June 2018

The Review is advised that this will be considered as part of the 2022 planning cycle.

RECOMMENDATION 44

The Scottish FA should undertake a comprehensive review of roles and posts across Scottish football to clarify categorically those which require PVG checks and those which don't in terms of current legislative provision and the definition of 'regulated work'.

Where anomalies or contention arises as a result of such a review, the Scottish FA should, on behalf of Scottish football, enter into discussions with the Scottish Parliament and Disclosure Scotland (as the relevant arm of Government) to address and rectify these promptly and clearly. Confusion or lack of clarity about 'regulated work' and how it applies to those engaged in the delivery of football in Scotland should be eliminated.

Progress since the Interim Recommendations of June 2018

The Review understands that the Scottish FA published a guidance note in 2019 on the Protection of Vulnerable Groups to reflect diversity of roles. A new Disclosure Bill has just received royal assent and the Review, like the Scottish FA, hopes that this will clarify these matters further.

RECOMMENDATION 45

Where notification of an individual for listing to Disclosure Scotland is a possibility, consideration should be given to this being undertaken through a single 'clearing house' within Scottish football so that individual cases are tracked and subject to consistent processes and to facilitate statistical reporting and analysis.

Progress since the Interim Recommendations of June 2018

The Review is advised that this will be considered as part of the 2022 planning cycle.

3.122. 'Safe recruitment' is a key aspect of making Scottish football safer for young people and reducing risk. Across all aspects of the game there is a need to incorporate child wellbeing and protection considerations and requirements into recruitment processes.

3.123. The Review is aware that safe recruitment training is available in other countries in the UK and believes that, in Scottish football, safe recruitment training should underpin the work of recruitment and appointment panels as appropriate.

RECOMMENDATION 46

The Review recommends that the Scottish FA scopes existing provision for safe recruitment training in Scotland and thereafter ensures that all recruitment and appointment processes reflect expected standards of child wellbeing and protection. Consideration should be given to relevant HR staff undertaking safe recruitment training so that this features prominently in the execution of HR tasks and roles. The Review further recommends that all recruitment/appointment panels should comprise at least one member who has successfully undertaken relevant and accredited safe recruitment training.

Where applicable consideration should be given to the practicalities of extending such safe recruitment standards (beyond PVG checking) to the recruitment of volunteers.

Progress since the Interim Recommendations of June 2018

The Review understands that HR staff (including HR staff for some clubs) have undertaken staff training and safer recruitment training in 2019 and future training and development needs will be included within the Learning & Development Framework.

3.124. The Review notes that if initial disclosure processes had been in place during the main period of concern (related to most of the allegations recently made) a number of those against whom allegations have been made would still have been certified to work in regulated posts within Scottish football (notwithstanding that some of them were allowed to operate in a variety of roles simultaneously).

3.125. Disclosure is a vital part of reducing risk and preventing abuse. The system is not always as user friendly as it could be but the Review is also aware that almost everyone sees the value in disclosure processes and hold these to be of significant importance. Most recognise however that these are only part of the picture in protecting young people, preventing abuse and reducing risk.

3.126. During the course of the Review these issues reached a critical tipping point within the Scottish Youth Football Association and, in turn, were of considerable concern to the Scottish FA. Considerable efforts were put in place to remedy this (and also were associated with the need for meaningful improvement in the relationship between the SYFA and the Scottish FA). The Review was encouraged by the 2017 audit carried out by Children 1st in respect of these issues and moreso with the considerable progress that has been made in sorting out the serious discrepancies and shortcomings in disclosure processes within the SYFA.

FOOTBALL CLUBS

3.127. The Review is grateful for the huge amount of information provided to it by football clubs at all levels and concerning a wide range of issues including past and current management of allegations; club policies; safeguarding practices and direction; relationships; etc. and for their views on the challenges and improvements needed.

3.128. The Review has discussed and met with a wide range of people involved in football clubs across the country from Chief Executives to safeguarding officers/CWPO's, coaches to Chairs of Committees and many more.

3.129. As a result, our observations about the readiness of clubs to effectively protect young people and reduce risk are considerable.

Shared inheritance

3.130. Historically in Scotland, in some areas, community-based youth football clubs have come into existence, developed and grown with an identity shared with the local senior professional club. There were a few examples of this across Scotland.

3.131. The historical 'value' seems to have been that these community-based youth football clubs, in the days before football academies, acted as a prime environment for young players to practice, learn and hone their skills and, often, transition to a trial or contract with the senior club itself. Essentially, they were 'feeder' clubs but with a relationship that went well beyond the through-put of young talent.

3.132. In those days the ties between those community-based youth football clubs and the senior professional club were clear and strong. It was acknowledged implicitly and explicitly that the youth football club was a part of the 'family' of the senior club; acted as a 'feeder' for young talent; and shared a tradition, history and heritage with the senior club. The relationship was strongly established to the point that officials of both clubs often knew each other well and interacted; officials of the senior club were often involved in the activities and profile of the community football club; the senior club would allow the youth football club to freely use its premises and facilities; branding, badging, colours and strips were often similar or identical.

3.133. When the senior club celebrated achievements, victories and successes this was shared by the youth football club as much as commiseration in footballing defeat.

3.134. The Review is of the view that, if the relationship and history between the youth football club and the senior club was so shared, so close, and so inextricable then when sexual abuse of young players formed part of the history of one then it too formed part of the history of the other. A shared heritage is not confined to trophies, victories and celebration. It also extends to defeats, failures, and deficiencies.

3.135. However, particularly with the advent of club football academies, these relationships have eased off. The Review would emphasise that in those circumstances brought to the attention of the Review there are now no constitutional or legal connections between local community 'boys' football clubs and the local senior professional club with which it previously had both previous formal and informal ties and allegiance. This is a very positive development.

3.136. The Review also recognises and commends the considerable steps taken by individual senior professional clubs and community-based youth football clubs to clarify and demarcate their relationship. This includes substantial developments made since the publication of the Interim Report of the Independent Review in 2018.

Club Wellbeing and Protection Officers (CWPOs)

3.137. The challenge for clubs in effectively meeting their obligations to protect young people and to reduce risk is substantial. In order to achieve it they require ongoing support, advice and occasionally direction. Above all they require clear lines of accountability which lead to greater confidence and explicit ownership of this work on the part of the club.

3.138. Even prior to the Scottish FA Directive (October 2016) most clubs in Scotland had identified a 'safeguarding officer' for the club. At grassroots level this individual most often would be someone undertaking tasks voluntarily in addition to other functions and normally see themselves as primarily responsible for making sure the right policies are in place and

overseeing PVG checking on behalf of the club. The training these people receive therefore tends to be focussed on these issues including the management of concerns.

3.139. For senior clubs the investment is more varied. By 2018 three senior professional clubs had created a dedicated paid post of “Safeguarding Officer” and appointed accordingly. Most others however had given safeguarding responsibilities to a staff member whose core role lay elsewhere such as Human Resources Manager or Club Safety Officer.

3.140. Where this was the case the Review was concerned that the knowledge base and the confidence level of those occupying these roles should be improved. It is not enough to simply accept without question that because someone, in their external career, may have been (or be) a teacher or a police officer or a social worker (or whatever) that they possess the requisite knowledge and confidence to undertake the vital and specific functions of Child Wellbeing and Protection Officer at the club. The occupant of the role should fill all the specifications and requirements of the role.

3.141. Although the Review supports the requirement for Child Wellbeing and Protection Officers at every club, it believes that this role and function needs to be properly defined and understood in general and constantly demonstrate that it is proportionate to the particular needs of different clubs and levels within the game and especially to the needs of young people and their protection (including the reduction of risk).

3.142. The Review considers that a standard core role definition is required but that this should be developed and expanded to meet the needs of particular clubs especially youth football and senior professional clubs with youth academies.

3.143. Youth football in Scotland should also seriously consider if the club Child Wellbeing and Protection Officer role is fit for purpose and examine how these roles are deployed so that all clubs can get maximum benefit (notwithstanding our view that the role is about more than ensuring policies are in place and overseeing disclosure checks).

RECOMMENDATION 47

There should be a standard role and person specification for Child Wellbeing and Protection Officers across all clubs which make clear the requisite expertise and knowledge base for undertaking this role.

CWP Officers should be recruited and appointed on the basis of their knowledge, skills and experience in relation to the safeguarding of children and young people and not solely on the basis of their previous broad professional or occupational roles outside of football.

Progress since the Interim Recommendations of June 2018

The Review is advised that a standard role specification was developed in 2019 and is available on the Scottish FA website.

RECOMMENDATION 48

In senior professional clubs* the Wellbeing and Protection Officer role should not be an "add-on" to other functions/roles within clubs but should be a dedicated salaried post (whether full-time or part-time) within the club.

In Tier One and Tier Two Academy clubs the Review recommends that these posts be full-time partly because of the extent of Academy responsibilities but also including where

there are also established community outreach programmes; out-of-season activities for young people etc. In remaining clubs (Tiers Three and Four) economies of scale should be considered and applied whereby clubs can share resources and personnel effectively and share the costs.

*Clubs with Football Academies at Tier One, Two, Three or Four.

Progress since the Interim Recommendations of June 2018

The Review is advised that the dedicated CWPO role will be included within higher level CAS criteria for 2021 - 23. Some senior Clubs have now appointed dedicated, salaried CWPO posts that did not exist prior to the interim report.

3.144. The Review received information that CWPO's (at whatever level) were not known to participants, parents, supporters, or indeed other club personnel. If this role is to be taken seriously and undertake effectively the important and sometime difficult tasks it involves then it must be both proactive and accessible. This means that in all instances everyone connected to a club should know who the CWPO is and how they can be contacted. Moreso, the role of CWPO should become evident and active within the club and its responsibilities understood by all so that the CWPO is able to engage with a wide range of people in order to support and educate towards embedding child wellbeing and protection in the culture and delivery of the club in all aspects.

3.145. One adult who provided an account to the Review and who wished to engage directly with the club concerned attempted to contact the CWPO for the club (a senior professional club). The details and identity of the CWPO was not available on the club website. He called the club at their stadium and reached the receptionist who did not know who the CWPO was (indeed didn't seem to know that there *was* such a thing). After some to-ing and fro-ing this man was put through to the Ticket Office to deal with his issues. This incident occurred in the wake of publicity concerning allegations of non-recent sexual abuse. The Review itself regularly had difficulty getting in contact directly with CWPO's because 'front of house' staff either didn't know who they were or didn't appear to know that such a role existed. This is unacceptable, and the Review expects all senior clubs to improve their interface with the public over safeguarding and especially to improve their responses and services for people who wish to discuss safeguarding issues or concerns.

RECOMMENDATION 49

CWPO's should be visible across all club functions events and activities concerning children and young people's participation and competition including interface with parents.

Club CWPO's should be identifiable and visible at all events where they are present or have a role. This should include making themselves known to everyone involved in the Club (parents, players, coaches, staff, etc) on an ongoing basis.

Some Club CWPO's wear clear identifiers such as branded clothing, badges etc so consideration should be given by all clubs to adopting similar practices.

Progress since the Interim Recommendations of June 2018

The review has been advised that it is now a requirement for the contact details of CWPO's to be on club websites and this is also now part of club licensing and audit criteria. The new role description for CWPO's sets out the expectations of the role. Network meetings organised by the Scottish FA establish the role of CWPO as the lead for taking forward Strategy within Clubs and the sharing of experiences in relation to visibility. The Review has

been informed that ongoing “informal monitoring” will be carried out in relation to the visibility of CWPOs.

RECOMMENDATION 50

The details of club Child Wellbeing and Protection Officers should be embedded throughout all relevant documents including ‘public facing’ literature.

Club handbooks should prominently include the names and contact details of designated CWPO’s and their duties/deputising arrangements. These should be routinely updated.

Progress since the Interim Recommendations of June 2018

The Review understands that the requirement for the contact details of CWPO’s and Child Wellbeing and Protection Policies to be on club websites is now part of club licensing and audit criteria.

RECOMMENDATION 51

Clubs must ensure that Child Wellbeing and Protection Officers and others charged with safeguarding responsibilities are easily accessed. This should include ensuring that wellbeing and protection information is clearly and easily identified on websites and ensuring all ‘front of house’ staff can route calls and enquiries to the relevant person for prompt attention. All automated options menus on switchboards should include the Child Wellbeing and Protection Officer for the club with clear instructions and arrangements for messages to be left.

Progress since the Interim Recommendations of June 2018

The Review understands that the requirement for the contact details of CWPO’s and Child Wellbeing and Protection Policies to be on club websites is now part of club licensing and audit criteria.

It is not clear if front of house staff have been duly briefed or trained and automated message options altered to give a direct route option to CWPO’s.

RECOMMENDATION 52

It is recognised that Child Wellbeing and Protection Officers in clubs carry considerable responsibility. This needs to be met with provision of the right training, support and development opportunities so this pivotal role is fully effective and engaged.

The Review recommends that the Scottish FA with assistance from partner agencies develop a comprehensive but applicable Framework for making decisions in relation to initial assessment and discernment of reported concerns. This is to ensure that there is not simply a ‘one size fits all’ response and that concerns are dealt with proportionately based on what is known and what is discerned in the first instance. The handling of concerns is often delicate and should not be reduced to a ‘painting by numbers’ which is procedurally driven (often denoting ‘back covering’ rather than focussing on the protection of young people and the reduction of risk).

The Framework should be viewed as a tool and, like any tool, it is only effective and purposeful in the hands of those competent and confident to use it. The Framework then should be subject to refinement ongoing but underpinned by a training and development regime which continually improves the skill, knowledge and confidence to apply in practice.

Progress since the Interim Recommendations of June 2018

The Review is advised that this will be considered as part of the 2021 planning cycle.

RECOMMENDATION 53

Consideration should be given by the Scottish FA to appointing 'regional' CWPO's to deliver ongoing support, advice and to supplement capacity for clubs across grassroots and professional clubs.

The focus of this role should be on *development* and as a way of effectively responding on the ground to the needs of clubs for advice, support and resources to improve their delivery of safeguarding and to make the right decisions to protect young people and reduce risk.

Team and squad trips

3.146. The Review also recognises that, in addition to the CWPO, when teams or squads are required to travel it is required that a 'child wellbeing and protection lead' for the trip be identified. This is often a coach or another official who is a delegate on the trip. The Review considered some instances where it was not evident that the child wellbeing and protection lead fully understood their responsibilities or took these seriously. The Review urges that this function is considered properly and fully. The attitudes, activities and responses of adults charged with responsibility for teams or squads on trips away was a crucial aspect of many of the situations considered by the Review in relation to non-recent sexual abuse and risk to young people in Scottish football. Indeed, some of the alleged abusers themselves led such trips. In other cases, coaches and other officials were important bystanders who could have done much more to prevent abuse and reduce or remove risk.

RECOMMENDATION 54

Anyone acting in the capacity of 'child wellbeing and protection lead' for the purposes of squad/team trips should be trained and equipped to carry out the identified functions and responsibilities of this role working closely with the squad/team manager.

Progress since the Interim Recommendations of June 2018

The Review understands that the revised policy now contains conditions for risk assessments of team trips and a practice note on Travel and Trips Away. Scottish FA staff have all received level 1 (child protection) training in 2019 and relevant staff will receive level 2 training in 2020.

The submission of reports resulting from trips to Clubs and the Scottish FA will be considered in 2021/22 as part of a wider discussion on information sharing.

RECOMMENDATION 55

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

Progress since the Interim Recommendations of June 2018

The Review is advised that the inclusion of a Practice Note on Prevention Planning is now included in the revised policy. Risk Assessments of team trips is also covered in the practice note on Travel and Trips Away.

Due diligence and access to certain roles at clubs

3.147. The Review was concerned about the manner in which some (alleged) abusers managed to confidently insinuate their way into undertaking a range of roles and functions within a club at any one time. This was often done with the, at least, tacit approval of managers or Board at the time.

3.148. The Review understands that this may be less likely to happen these days but was not entirely convinced that there are proper checks and balances in place across the game in this regard.

3.149. Individuals operating within clubs – especially where this involves young people – should be required to work to a specific role to which they have been properly recruited and appointed. The conditions for recruitment and appointment should be transparent and not based on ‘word of mouth’ or simple ‘personal recommendation’. This was a practice most commonly observed in grassroots clubs where a volunteer workforce sustained the club.

3.150. The Review came across various incidences where someone was able to occupy a role in relation to young players simply because someone else (whose reputation was well thought of at the club) had spoken up for their reliability. Often this was based more on “who knew who” rather than due diligence. There were still vestiges of this within clubs where recommendations by people who are ‘trusted’ go a long way (if not completely) in making an automatic appointment. This practice was a longstanding aspect of Scottish football but one which has implicit risks to young people and to the club. The Review recognises that where this happens (and elsewhere) there is a disproportionate reliance on Disclosure checking as the only ‘check and balance’ seen by clubs as required to endorse appointment.

3.151. The Review would remind everyone in Scottish football that many of the alleged abusers referred to in Section One of this report would still have been appointed today if Disclosure checking was the only measure of suitability. And personal recommendation would also not have been any more reliable as an indicator of appropriateness. Perhaps the contrary.

RECOMMENDATION 56

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

In a number of serious cases this has also permitted them to engage in hands-on, intimate activity with young players, often in private, without question or challenge.

There is an urgent need for a clear and consistent definition of *all* roles within football and checks and balances to be put in place to ensure roles are adhered to. The Review recommends that a full review of all roles in football is undertaken with a view to these being clearly defined and demarcated so that a clear system can be put in place which reduces the possibility for people to hold multiple functions without due consideration and overall accountability being held by the club itself.

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

Progress since the Interim Recommendations of June 2018

The Review is advised that the Scottish Football Working Group started this work in 2018 but the volume of roles identified and different interpretations proved prohibitive to progress. The Working Group has focused on developing “values based” role descriptions, with the exception of key roles such as Coach, CWPO, Physio and Scout which are subject to more particular specifications. The Recruitment and Selection Toolkit aims to ensure everyone is appointed through a transparent recruitment process.

Physiotherapy and sports therapy

3.152. Concern arose about instances where individuals operated in clubs as coaches or managers and were permitted to engage in hands-on, sometimes intimate, physical activity with young players under the pretext of ‘physio’ or ‘rehabilitation’. Muscle warming and rub down was the most common example of this but it extended as far as the treatment of alleged injuries. In the non-recent cases considered by the Review this was often, but not always, undertaken in private with no other persons present. We recognise that creating private and secluded spaces to engage with young people is far less likely to be permitted these days (unless the individual is properly registered and accredited from a professional point of view and has the consent of the young person).

3.153. The Review was aware that, particularly in grass roots football, muscle warming or rub-down during intensive training or play was often required to rehabilitate young players and to prevent injury. For many of these clubs this was administered by team personnel usually coaches. On no occasion such as this should any such hands-on ‘treatment’ be applied in private. When private treatment is required this should be undertaken only by a qualified, registered and accredited practitioner and with the consent of the young player or their parent/caregiver.

3.154. The Review has considered cases where someone managed to be referred to as a “physio” when they were actually nothing of the sort. The Review also considered cases where the alleged abuser may well have been a registered physiotherapist (we have no way of confirming that he was registered with the CPSM at the time) and who allegedly engaged in abuse in private spaces (often his own home or a hotel room).

3.155. In Scotland ‘physiotherapist’ is a protected professional title. Physiotherapists in Scotland have been required to be registered with the Council for Professions Supplementary to Medicine (CPSM) since 1960. Since 2002 the competent authority and registering body is the Health and Care Professions Council (HCPC). All professions registered with HCPC (including physiotherapists) are held to standards of conduct, performance and ethics but what an employer requires a physiotherapist to do within their role (provided it does not conflict with any of the HCPC standards) remains at the discretion of the employer.

3.156. Sports therapists however are a different but associated discipline and they too are trained and qualified to a high degree. Sports therapists are regulated by the Society of Sports Therapists (SST) however this is not a mandatory registration body and is not part of the HCPC.

3.157. The Review is of the opinion that qualified Sports Therapists should be mandatorily required to register and be subject to the same codes and standards as physiotherapists are under the HCPC and that would further assist their recruitment and deployment within football across all levels of the game.

3.158. In today's game the Review appreciates that either physiotherapists and/or sports therapists will normally be engaged as practitioners in assessing or treating performance related issues or conditions in some clubs often to prevent injury and maximise athletic performance, stamina and endurance. However, the Review is aware that in other areas of the game and especially in grassroots football the term "physio" may still be used generically to cover a wide range of activities and interventions with young players. This needs to be addressed so that any misinterpretation or any potential abuses of the title are eliminated.

RECOMMENDATION 57

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

However, when young players have or complain of sore or exhausted limbs or minor aches during training or play, the Review has concerns as to what type of treatment is administered, what the conditions and arrangements are for this and who is permitted to provide this.

The Scottish FA should scope and review this issue comprehensively with a view to developing and putting in place a full protocol governing these circumstances across Scottish football for under 18s. This review should also include scoping the use of sports therapists across Scottish football (as distinct from accredited and regulated physiotherapists). If sports therapists are noticeably in use the Scottish FA should convey the view of the Independent Review to the HCPC that sports therapists should be required to register and be subject to regulation (similar to physiotherapists).

Progress since the Interim Recommendations of June 2018

The Review is advised that this will be addressed by the Scottish Football Working Group in 2020.

Host families

3.159. The Review has concern about the recruitment and management of 'host' families for visiting young players including those on trial for clubs. The Review found that arrangements and policies differed between clubs and there was some discrepancy also in respect of the overall protection for visiting young players particularly from other countries and where they could not be accompanied by a parent. Any such arrangements should *always* contain a proper assessment of risk and cover the entire visit from entry into Scotland to ensuring (if the young player is returning home) that there are safe arrangements for their collection at the other end. On no occasion should a young player who has been 'released' by a club be left to their own devices or arrangements for their ongoing stay disregarded if they are not immediately returning home. The 'host' club has a duty of care to any such young player from the point of entry into Scotland (or the UK) to the point of their exit.

RECOMMENDATION 58

The Scottish FA in partnership with Clubs should conduct a full review of the arrangements for young players (U18) visiting or coming to reside in Scotland for trials or to play. This is with a view to ensuring consistency and compliance across Scottish Football including transport, chaperone, accommodation, support, integration etc

Where such players are to return to their country of origin, an exit strategy focused on their wellbeing and support should be put in place with the responsibility placed on the host club to implement this.

Progress since the Interim Recommendations of June 2018

The Review is advised that this will form part of the 2022 planning cycle.

RECOMMENDATION 59

The Scottish FA in partnership with clubs should conduct a full review of recruitment, designation, training, and support of 'host families' for young players, ensuring consistency and compliance across Scottish Football.

Progress since the Interim Recommendations of June 2018

The Review is advised that this will form part of the 2022 planning cycle.

Football Scouts

3.160. According to some of the personal accounts provided to the Review the role of scouts emerged as a key area of concern. The Review found that there had been considerable improvement in how football scouts are recruited and organised since the time of the events considered by the Review in Section One of this Report. At that time the role of football scout, it seems, could just be assumed by anyone with connections and wishing to engage with the process of identifying new talent and young players and broker their introduction to clubs.

3.161. Direct access to young players was virtually unmonitored at that time and equally scouts would commonly also contact parents and establish relationships. Very often they carried with them a degree of credibility for little other reason that they claimed to be or were 'well connected' and had some sense of what potential in a young player looked like. It remains to be seen how this at the time was viewed by clubs but young people and parents readily put their trust in people (who were often relative strangers).

3.162. The Review would positively view a move towards registration of scouts by the Governing Body even when individual clubs are responsible for their work, output, and deployment.

3.163. Any features of scouting role and activity which are 'independent' and therefore not subject to scrutiny need to be reined in. Additionally, the Review believes that the role of club scout should be standardised and subject to a clear complaints procedure consistent across Scottish football. Similarly, the Review urges all clubs to adopt a clear practice of accreditation of scouts.

RECOMMENDATION 60

The Scottish FA along with clubs should identify best practice for the recruitment, management and monitoring of football scouts to be agreed and implemented across

Scottish football. This should be with a view to developing a standardised protocol governing the activities of scouts including a conduct and complaints/disciplinary procedure.

Football scouts should be subject to consistent accreditation and their identities published on club websites so that other clubs and parents can readily check their credentials. Similarly, they should always carry identification from their club which verifies and authorises their role.

Progress since the Interim Recommendations of June 2018

The Review has been informed that the Scottish Football Working Group has established a Scout Sub Group which has created a Scout Protocol and role description to be finalised and rolled out in 2020. Implementation of the protocol part of 2021-23 CAS Regulations.

RECOMMENDATION 61

The Review understands that it is common across clubs for scouts to be prohibited from having direct and unsupervised contact with young players. The Review recommends that this requirement is made standard across Scottish football and protocols devised and put in place accordingly.

Progress since the Interim Recommendations of June 2018

The Review is advised that the Scottish Football Working Group have established a Scout Sub Group which has created a Scout Protocol and role description to be finalised and rolled out in 2020. This matter is to be addressed within that Protocol.

Intermediaries

3.164. In the circumstances of non-recent sexual abuse in Scottish football the role of the intermediary (the football agent) was not a noticeable feature. However, in discussions with stakeholders in football this is mentioned often as an area of risk which requires attention.

3.165. The Review received and considered a range of information concerning the role and function of intermediaries with young players including concerns about the possibilities of abuse and exploitation. The Review takes these concerns seriously. The Review has consulted with players organisations as well as with ex-professional footballers themselves who started in youth football and were represented by agents in their transition to the professional game. Our main area of concern, as might be expected, is the possibilities that such a role might be able to be accessed relatively easily by someone who may pose a risk and that without effective and consistent due diligence they may be able to enter into relationships with young players which become abusive or exploitative.

3.166. Given the nature of modern football in Scotland the Review shares the views of others that it is difficult to see a case for young players actually needing the 'services' of an intermediary. The general view of those who have contributed to the Review is that young players on a trajectory to elite level football and the professional game do not require this kind of representation but their needs are confined mainly to financial advice which can be given without the representation of an intermediary.

3.167. The Review concludes that intermediaries should not engage with or represent young players under age 18 years. The Professional Footballers Association along with the Scottish FA

should look at how good independent financial advice can be made available to young players under age 18 and their families without the need for intermediary representation.

3.168. Football intermediaries (formerly ‘agents’) were regulated by FIFA until 2015 when de-regulation came into force. As it stands the national SGB’s are left to decide if and how intermediaries should be regulated domestically. Some have chosen to implement basic requirements such as registration, a registration fee, and background checks.

3.169. The Independent Review understands that some in football in Scotland would view re-regulation as bureaucratic and cumbersome. From a child wellbeing and protection point of view the Review is of the opinion that minimum requirements should be introduced in order to monitor and regulate the activities of intermediaries (whether or not they are allowed to represent young players).

RECOMMENDATION 62

It is recommended that a joint review should be conducted between the Scottish FA, the PFA and other relevant parties of the role of intermediaries in relation to young players with a view to agreeing and putting in place a system of regulation to satisfy proper wellbeing and protection standards. Serious consideration should also be given to the appropriateness of intermediaries representing young players. The Review recommends that minimum requirements for football intermediaries operating in Scotland be introduced in any case. These should include a system of registration, PVG checks and a code of conduct.

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

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

Progress since the Interim Recommendations of June 2018

The Review is advised that a working group led by the Scottish FA is in the process of being set up to consider this issue during the course of 2020.

Workplace practices, facilities and spaces

3.170. The Review heard from a number of people, including those personally affected by sexual abuse in football, expressing concern about the security and management of spaces and how this has been an important aspect in sexual abuse in Scottish football.

3.171. The Review accepts that much work has been done to properly monitor and regulate this including the use of vehicles for transporting young players; the general prohibition of visits by young players to private homes of adults; adults’ presence in changing facilities and showers; etc.

3.172. However, the issue of the management of ‘spaces’ and situational prevention has been a concern which the Review believes requires further attention.

3.173. One contributor (who had given a personal account to us of sexual abuse in football) spoke of his ease of access to a training facility (leased by a local club) where he was able to

enter the facility (past the changing rooms) to meet his young son who was to be collected. He was not challenged or interrupted by anyone.

3.174. The Review appreciates that for grassroots football particularly (but not exclusively) the monitoring and management of premises and facilities which are leased and do not belong to the club presents a challenge.

3.175. The Review believes that there is much merit in understanding and applying the principles of *situational prevention* across Scottish football which looks at a range of environmental factors which need to be taken into account to prevent opportunities for child sexual abuse and to reduce risk. This is particularly the case, for Scottish football, in relation to preventing opportunity for sexual abuse and reducing risk in both public settings and in 'institutional;' settings. Aspects of this also include workplace practices as well as assessments of physical spaces and their use and management.

RECOMMENDATION 63

The Scottish FA should conduct a review of arrangements and protocols concerning clubs use of local premises or leasing from other bodies such as Local Authorities; private or community facilities. This should determine security arrangements to protect young players as well as clarifying responsibilities and accountability for risks. This should be with a view to producing a simple framework for assessing risk prior to leasing or usage of non-club, third-party premises/facilities.

Progress since the Interim Recommendations of June 2018

The Review is advised that this will form part of the 2022 planning cycle.

RECOMMENDATION 64

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

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

Progress since the Interim Recommendations of June 2018

The Review has been informed that staff of the Scottish FA Wellbeing & Protection Department and some club CWPOs received training on situational prevention in 2019. A proposal is currently being considered to create a pack/guide to provide others with the tools to produce their own situational prevention plan.

Planning fixtures, matches, tournaments and events

3.176. To ensure that the assessment of situational and environmental risk is applied to considerations of the protection and reduction of risks for **all** young people in Scottish football (not just young players) the Review concludes that full consideration of risks and the protection

of young people should also be prominent in the organisation of any event including tournaments and matches. This also means fixtures across Scottish football where security plans or briefing are put in place on a match by match basis.

RECOMMENDATION 65

Wellbeing and protection responsibilities and actions concerning the protection of young people and the reduction of risk should be addressed in security contracting agreements and in pre-match briefings.

Progress since the Interim Recommendations of June 2018

The Review understands that the Scottish FA Wellbeing & Protection Department created an Event Plan for the Women's Under 19s tournament as a pilot. Event welfare planning will be taken forward within the Scottish FA in 2020.

Communication

3.177. The Review has considered the range of ways in which Scottish football communicates its purpose, arrangements, obligations and structures in relation to the protection of young people and the reduction of risk. While some progress has been made in this the picture is uneven and inconsistent.

3.178. The Review considered key documentation such as club safeguarding handbooks where the content was out of date, inaccurate or just plain wrong. During the process of the Review, serious errors in documentation were found that were 'live' and this was brought to the attention of the club concerned.

3.179. However, it was evident that a number of basic things needed to be put in place and sustained so that communication by clubs with their users and the public is always relevant and current.

RECOMMENDATION 66

Wellbeing and protection policies/procedures should be accessible and presented in a way that is appealing and available in a variety of formats for immediate access and display. The Scottish FA and Clubs where possible should consider the use of apps and other platforms to host relevant information for users, staff and the general public.

Progress since the Interim Recommendations of June 2018

The Review is advised that particular attention has been paid to the accessibility of the revised policy. As part of the Wellbeing and Protection Communications Strategy this will be further looked at with consideration given to other appropriate methods of communicating the policy, or relevant parts of the policy.

RECOMMENDATION 67

Detailed attention should be given by the Scottish FA and clubs to website content to ensure that all wellbeing and protection information and material is prominent, clear, accessible and easily navigated.

This should also include a visual representation of accountability within club structures (such as a simple organogram).

Progress since the Interim Recommendations of June 2018

The Review has been informed that the Scottish FA has updated the Wellbeing and Protection pages on its website, making this more prominent and visible. New content and links to external resources have been also added. Work with clubs and associations will be taken forward as part of the Wellbeing and Protection Network and audit requirements in 2020.

3.180. The Review found the sheer number of documents, policies and procedures to be an issue. The Review recognises that, at some point, all of these have been considered necessary and much effort has been put in place to develop these and put them in place. But the efficacy of and need for policies and procedures lies in their *quality* and *ease of use* and not in the quantity that is produced.

3.181. Indeed, where there is a superfluity of documents and policies it is easy for people to become overwhelmed and confused as to which iteration is current or how each relates to the other. To adequately protect young people and reduce risk it is vital that policies and procedures are accessible, usable and current. They also need to be codified, simplified and streamlined.

RECOMMENDATION 68

There is a superfluity of material and documents on wellbeing and protection across Scottish football - this is often/sometimes confusing, duplicative and contradictory. Individuals and Clubs therefore become confused about accountability and responsibilities.

The Scottish FA together with clubs should take measures to ensure that all policies, documentation, procedures and protocols are properly codified and simplified to ensure accessibility and ease of understanding and use across all organisations and clubs.

Extraneous and obsolete information, policy and guidance should be removed and one simple, straightforward suite of information and policies provided. A continuous updating process should also be put in place.

Progress since the Interim Recommendations of June 2018

The Review is advised that this has been considered as part of the review of the Scottish FA's policy on the Wellbeing and Protection of Children and Young People in Scottish football. This is awaiting approval and thereafter will be rolled out to members during 2020, with all members having reviewed their policies by 31 December 2020.

Information sharing

3.182. In examining the situations of non-recent sexual abuse covered in Section One of this Report the Review found that one of the major barriers to the effective protection of young people and the reduction of risk at the time was that information was not shared by those with either knowledge or suspicion about the activities of alleged abusers.

3.183. Current processes for sharing such information within Scottish football and between constituent parts is set out in a protocol on information sharing. The Review was encouraged that this protocol is in place and that any tendency to retain information which requires to be shared is now over-ridden. However, the Review considered information indicating that the

protocol does not deal adequately with the storing and retention of information including clear statements about who is responsible for this. Confidentiality and secure storage are also issues which need to be addressed and clarified.

3.184. The flow of information concerning the protection and wellbeing of young people of course requires to be carefully managed and proportionate. Whilst the past suffered from a lack of information sharing there is a danger that the present is hampered by the loose handling of information and lack of clarity about who is responsible for what in relation to its management.

RECOMMENDATION 69

The protocol for information sharing between the constituent parts of Scottish football and the Scottish FA requires further refinement and clarification so that it provides an effective, accountable and proportionate way of dealing with safeguarding matters and concerns. This must include provision of **secure and confidential** processes and systems for transmitting and storing information.

Progress since the Interim Recommendations of June 2018

The Review is advised that revised Data Sharing Agreements were rolled out to all members in 2019.

3.185. The flow of relevant information within Scottish football is a vital area for improvement. However, the Review is also aware of the need to put in place and sustain good processes for sharing information between sports since both some athletes and some adults (including this about who concerns have been raised) may be active in more than one sport.

RECOMMENDATION 70

The Scottish FA should review arrangements for sharing of information *between* sports. This should be done in consultation with Sportscotland with a view to putting in place improved mechanisms which fully take account of the role of Disclosure Scotland and Listing/Barring processes.

Progress since the Interim Recommendations of June 2018

The Review understands that this will be considered as part of the 2022 planning cycle.

Responding to complaints

3.186. The Review considered some input from parents and others who had cause to submit complaints concerning issues in relation to the treatment of young players particularly in youth football.

3.187. It seems that the process for managing these complaints, from the complainer's viewpoint, was far from objective and parents were sometimes left feeling that they had been treated discourteously, unfairly and without due transparency in the handling of their complaint.

3.188. In considering their possible next steps some gave up because effectively they would be making a complaint to the person who dealt with their original grievance about that same person. This is not a transparent or appropriate way of dealing with and remedying grievances. It is particularly unacceptable when dealing with concerns, complaints or grievances related to the protection of young people in football.

3.189. The Review has noted that there are differing processes across Scottish football in how complaints about the handling of safeguarding issues are managed. Under no circumstances should anyone be in a position where they deal with a complaint made against themselves.

RECOMMENDATION 71

It is recommended that the Scottish FA, its members and partners review all processes for the handling and management of complaints where these are about the way wellbeing and protection matters have been dealt with a view to ensuring that an effective, transparent and consistent complaints process is put in place within all clubs/organisations. This should also address how a complaint is to be progressed if it is related to anyone who might ordinarily be charged with the responsibility to deal with the complaint.

Progress since the Interim Recommendations of June 2018

The Review is advised that this was considered as part of the review of the Scottish FA's policy on the Wellbeing and Protection of Children and Young People in Scottish football. This is awaiting approval and thereafter will be rolled out to members during 2020, with all members having reviewed their policies by 31 December 2020.

Club licensing and compliance

3.190. The Review understand that compliance is a key issue in achieving and sustaining the best possible standards to protect young people and reduce risk in Scottish football. But compliance is only a means to an end. That 'end' must entail the complete and permanent embedding of protection and wellbeing values, thinking and practice across the Scottish game and particularly in football clubs.

3.191. As the Minimum Operating Requirements eventually were met within the Scottish FA it became evident that protection and wellbeing should also form an important part of the compliance and licensing regime for football clubs. These often centre around the presence, quality and application of safeguarding policies and processes at club level.

3.192. The process and conditions of club licensing have been examined by the Review especially with regard to protecting young people and reducing risk. There was a varied picture, but the Review was encouraged that wellbeing and protection were considered an important aspect of football club 'fitness', effectiveness and delivery and that criteria for assessing this in licensing processes were in place.

3.193. However, the Review concluded that the level of criteria in respect of wellbeing and protection for club licensing purposes was too low. Decisions therefore about the 'fitness' of a club are made on the basis of a fairly low threshold of acceptability and requirement to demonstrate wellbeing and protection quality. The presence of policies is not an accurate indicator of a club's capacity to effectively protect young people or reduce risk to a standard that grants a license to operate. The **content** of policies is crucial since these have to be accessible, understandable, relevant, current and applicable. Indeed, even this is no guarantee that a club actually implements its policies and has a strategic plan in place to ensure how outcomes are measured as a result.

3.194. The criteria for licensing also have to be underpinned by Codes of Conduct for all staff and volunteers that are *fit for purpose* from a wellbeing and protection point of view.

3.195. The Review noted that licensing staff were not adequately equipped to assess these issues since many had little or no training, experience or confidence in relation to matters concerning the protection of young people and the reduction of risk.

3.196. The relationship between the Children and Young People's Protection and Wellbeing staff at the Scottish FA and the licensing team is crucial since they need to work in close partnership to take this forward. Indeed, existing safeguarding expertise should be utilised to assess and agree the compliance of football clubs for licensing purposes and vice versa to conduct auditing functions.

RECOMMENDATION 72

The Review recommends that the level of criteria for wellbeing and protection by clubs in relation to club licensing should be raised.

Progress since the Interim Recommendations of June 2018

The Review has been informed that in 2019 Club Licensing criteria was increased to include policies on websites and policy introductions from CEO's. The criteria have been raised again for 2020 through the addition of self-assessment against the SportScotland Standards for Wellbeing and Protection in clubs. A gradual increase in compliance standards will be an ongoing process.

RECOMMENDATION 73

Licensing staff at the Scottish FA should be trained in wellbeing and protection proportionate to their needs as identified in the Wellbeing and Protection Training Pathway.

Progress since the Interim Recommendations of June 2018

The Review understands that training was received in 2018 and updated in 2019 as part of all staff training.

RECOMMENDATION 74

In the conduct of club licensing processes and examining club's compliance and 'fitness' to meet required standards licensing staff at the Scottish FA should engage and utilise the expertise of Scottish FA Wellbeing and Protection staff to assess /agree compliance of clubs for licensing purposes. Similarly, mutual support and advice should be provided in the conduct of safeguarding auditing functions.

Progress since the Interim Recommendations of June 2018

The Review is advised that this was put in place in 2018.

RECOMMENDATION 75

The Licensing Committee should receive appropriate training and ongoing information on wellbeing and protection to ensure its decision-making is proportionate, informed and effective. Their training needs should also be identified and proportionately met through the Training and Development Pathway.

Progress since the Interim Recommendations of June 2018

The Review understands that training was carried out in 2018 and going forward will be included within the Learning & Development framework.

Human Resources and records

3.197. It was a matter of note to the Review that no documentation relevant to the cases of non-recent abuse which were considered were available from the clubs concerned.

3.198. Every relevant club confirmed in writing that it either did not hold or could not trace/retrieve a range of documented records which could confirm that certain people were employed or engaged by the club at the time; dates when they were employed or engaged at the club; how key decisions were made; allegations, complaints or relevant information said to have been submitted to the club; reports that the club was said to have made to the authorities; etc.

3.199. In fact, in relation to the matters concerning situations of non-recent sexual abuse or to possible risk, the Review was provided with almost no records whatsoever from which to discern what was known and what action was taken.

3.200. Records concerning individuals of course are subject to Data Protection requirements and employment records are also governed by statutory conditions.

3.201. Nevertheless, it has been a matter of concern that key information was not subject to proper and proportionate retention policies that make sense for wellbeing and protection and the reduction of risk. The Review was told that employment records are normally destroyed according to the regulations which apply to PAYE. There appeared to be little consistency in relation to volunteer records. The Review accepts that records in respect of allegations and concerns which arise in Scottish football are now subject to protocols for recording and information gathering. However, there is need for clarification and strengthening of arrangements and processes for the retention of records across Scottish football which may have relevance for wellbeing and protection issues and the management of concerns and risk in future.

RECOMMENDATION 76

The Scottish FA should undertake (along with relevant parties) a full review of record retention policies and practices across Clubs/ANAs/SFA with a view to ensuring that this is commensurate with the needs and requirements of cases arising concerning alleged non-recent abuse and compliance with current legislation on data-protection and record retention. This should apply to all records including, but not exclusively, employee and volunteer records.

Progress since the Interim Recommendations of June 2018

The Review has been advised that the Scottish FA has in place all data protection policies required to ensure that records are kept for no longer than necessary (one of the data protection principles). IT have written a records management policy and the Scottish FA is working towards the completion of the retention schedule. The retention schedule for the Wellbeing and Protection Department has been completed. The retention periods take into account the updated relevant legislation. The Scottish FA's retention schedule will be published and Clubs and ANAs can review it to ensure consistency in approach.

3.202. The Review appreciates the importance of good human resource management and practice in relation to the protection of young people and the reduction of risk.

3.203. In the past the “child protection” responsibilities were often discharged by human resource managers within senior professional clubs. During the course of the Review this appeared still to be the case in a number of such clubs. The Review questions the appropriateness of this arrangement since HR staff do not have the necessary training, experience or expertise required to undertake these functions.

3.204. The Review also appreciates the participation of some human resource managers in football in the Review process. This was sometimes in relation to wellbeing and protection processes such as PVG and sometimes because the HR manager held responsibility for safeguarding within a club. It was also to determine the existence/availability (or otherwise) of records to allow the Review to assemble a picture of club decisions and actions.

3.205. The Review appreciates the continuing importance of HR functions in relation to protecting young people in football and reducing risk within clubs and organisations.

RECOMMENDATION 77

In improving processes and structures for the wellbeing and protection of children and young people and reducing risk the Scottish FA, clubs and organisations should pay due regard to the interface between wellbeing and protection practice and delivery and the functions and responsibilities of Human Resources and to improving accessibility and communication between these two functions.

Progress since the Interim Recommendations of June 2018

The Review understands that existing and reviewed policy reference the role of HR in terms of disciplinary processes when there is a concern about an adult. Within the Scottish FA, the Head of HR is a member of the Safeguarding Panel for recruitment decisions to be made. Most clubs who have dedicated Wellbeing and Protection Officers have sited them within HR Departments. Completion of this work will continue along with implementation of earlier linked recommendations.

RECOMMENDATION 78

In 'non-recent' cases of alleged or suspected abuse, the role of HR directors in collating relevant information is critical - particularly past employment/volunteer records; financial and payroll records etc.

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

Progress since the Interim Recommendations of June 2018

The Review has been advised that HR staff have undertaken staff training and safer recruitment training in 2019. Future needs are to be included within the Learning & Development Framework.

Coaching

3.206. The Review recognises the significant improvements in coaching training, quality, methods, and philosophy in recent years across all sports.

3.207. In football, these changes continue to have a considerable impact on our current and future success as a footballing nation as well as the careers and lives of current young players (whether or not they go on to careers in football).

3.208. The Review does not underestimate how important progressive improvements in coaching approaches and practice are in helping young players develop and in improving the protection and wellbeing of young people in football.

3.209. During the period of concern addressed in Section One of this Report coaching of young players was a very different picture. The Review heard numerous accounts of excessive and sometimes extreme practices, bullying, harassment and disparaging of young people as part of an accepted coaching regime at the time. Indeed, the Review also heard accounts of how this was replicated in the adult professional game too.

3.210. The previous coaching culture determined that force and command achieved results and that young players needed to be taught complete submission to the command of coaches without question and without reaction. This culture also held that, in order to instil physical discipline and stamina, the young player should expect to endure harsh physical training which took little account of their physical or mental wellbeing but was solely focussed on competitive success at all costs.

3.211. The Review understand well that sporting success comes at a cost – often mostly borne by the athlete him or herself.

3.212. However, this coaching culture also represented a more general cultural imperative in Scottish football – that young players were seen and treated as ‘assets’ rather than as young people. The competitive drive for club success was fuelled by reputational glory and sometimes commercial value to the exclusion of pretty much everything else.

3.213. The Review heard examples of how coaches followed this approach to coaching young players. However, many examples of coaches who were, even then, genuinely interested in young people, their development and their wellbeing were also provided.

3.214. But it is easy to see how either approach might be used to disguise abusive intentions or behaviour and, indeed, this was the case in the experiences of non-recent sexual abuse related to the Review. Under the guise of harsh uncompromising coaching young players were dehumanised and stripped of any capacity to refuse consent or cooperation. For some these experiences were clearly only a part of a process of desensitisation and brutalisation intended to be followed by sexual abuse or sexual assault.

3.215. A more ‘sympathetic’ coaching approach however was, for others, manifested through favouritism and preferential treatment which included constant affirmation and being rewarded by material purchases and gifts. This was an aspect of desensitisation and ‘grooming’ which then led to sexual abuse and sexual assault.

3.216. The Review has been impressed by the improvements not only in coaching practice but the requirements in place to recruit, support, monitor and regulate coaches in the delivery of their work.

3.217. A coaching relationship with an athlete is perhaps a unique one. It is predicated on the trust, confidence and reliance of the athlete in the coach in a way unlike any other relationship perhaps with the exception of parenting. It is, above all, a relationship constructed on a fundamental power differential between coach and athlete.

3.218. The prerequisites of good coaching are that the young athlete is in ‘safe hands’ and can trust the coach with their body, their interests, their success and their wellbeing. This is not an unconditional relationship but nevertheless, from the point of view of the young athlete, it means that the intensity and level of trust goes beyond that which they experience in any other relationship other than (sometimes) with their parent.

3.219. In today’s sports coaching, it is understood that *communication* is at the heart of helping the young athlete achieve their goals. Mentoring is a key method which comprises patience, dedication, example, stewardship, support, solidarity and protection. Today’s coaches across sports, and including Scottish football, are expected to have skills and attributes which are very different to those of twenty or thirty years ago. The Review considers *transformational coaching* to be the right way to help young athletes learn, improve and develop using this platform to nurture and transform young people. This therefore places centre stage the *whole* young person not just their physical prowess and mental focus. The needs of coaches are met through meeting the needs of young players.

3.220. The Review is encouraged that some clubs had already engaged with Positive Coaching Scotland to develop a positive coaching environment for young people.

3.221. The Review is aware that, in some respects, coaching in Scottish football is still in a process of transition. The speed of this transition depends on a number of factors including the wider culture of football (and whether it is conducive to change); leadership; the capacity for existing (or longstanding) coaches to adapt; and the environment in which the coach practices.

3.222. The Review believes that now is the time for Scottish football to articulate in a coherent and decisive way the underlying ethics and principles of the coaching it expects and to recruit and develop coaches who are committed to these principles and who are able to integrate these into their coaching practice with an acceptable level of skill and ability to best enable young players. This should also be reflected in coach recruitment and in all public facing statements about how young players will learn and be treated.

RECOMMENDATION 79

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

Progress since the Interim Recommendations of June 2018

The Review understands that this will be part of the work of the Scottish Football Working Group in 2020.

RECOMMENDATION 80

An agreed Ethical Framework for coaching activity with under 18s in Scottish football should be developed and put in place and this should form the basis for the coach Code of Conduct.

Progress since the Interim Recommendations of June 2018

The Review understands that this is to be considered as part of the 2021 planning cycle. Values developed as part of the overall strategy are reflected in the revised Code of Conduct within the revised policy.

3.223. The Review found that the recruitment of coaches was a variable issue across Scottish football. For many grassroots football clubs, coaches are often sought out through word of mouth. This is seen as often not only the most efficient way of identifying coaches but also the most effective. The Review fully understand that the needs of grassroots football clubs vary considerably and, in some cases, there isn't a lot to choose from when a coaching role is created or becomes vacant. Since football can be a small family (with a big reach) putting out 'feelers' and spreading the vacancy by word of mouth is not only less expensive but also sometimes the best way of attracting potential coaches with a good track record. We are also well aware that, in grassroots football, coaches are often 'specialist' volunteers. Their contribution to the sport (when coaching practice is safe and of good quality) is immense. However, the Review had also to reflect on whether this is entirely squared with the protection of young people and the reduction of risk. We do not want to 'throw the baby out with the bathwater' by tying the hands of (sometimes struggling) grassroots football clubs in relation to the recruitment of coaches. But protection and wellbeing practice needs to be foremost in these areas.

RECOMMENDATION 81

The Scottish FA with members and partners should review coach recruitment practices across all levels of Scottish football with a view to aligning these with wellbeing and protection processes across the board. In the conduct of such review, the Scottish FA should also take into account 'informal' identification and recruitment of coaches in order to develop a workable system for many grassroots clubs which should be more explicit, accountable and auditable.

Progress since the Interim Recommendations of June 2018

The Review has been informed that a Recruitment and Selection Toolkit developed by the Scottish Football Working Group has addressed this and ANA audits also look at recruitment practices.

RECOMMENDATION 82

Recruitment and appointment of coaches with young players should also include an 'assessment' of the values and attitudes of candidates in relation to children and young people and their diverse needs and based on the Ethical Framework.

Progress since the Interim Recommendations of June 2018

The Review understands that the Recruitment and Selection Toolkit developed by Scottish Football Working Group has addressed this.

RECOMMENDATION 83

Coaching development programmes in Scottish football should be amended to ensure a focus on the needs, abilities, inclusion, potential, skill, knowledge, rights, and protection of children and young people participating in the game at every level.

The training and development framework for coaches therefore should equip coaches to respond *holistically* to individual children and young people as well as groups and to ensure that they are effective in communicating with children and young people.

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

Progress since the Interim Recommendations of June 2018

The Review is advised that Children's Wellbeing in Scottish Football (level 1) training is a mandatory pre-requisite for all courses. Additional Child Wellbeing input (face-to-face) from the Scottish FA's Wellbeing and Protection team is provided during all higher licence level courses. During assessment at License level a higher level scoring is attributed to coaches performance for their manner and attitude during sessions.

RECOMMENDATION 84

Coach education and assessment should also assess how coaches/trainee coaches interact and communicate as part of periodic or ongoing accreditation.

Progress since the Interim Recommendations of June 2018

The Review has been advised that a higher level of scoring is attributed to coaches performance for their manner and attitude during sessions.

3.224. The Review believes that the capacity for coaches to *communicate effectively* with young players and to support them is fundamental to their protection and the reduction of risk. Communication with young people is a core skill which is important to the technical aspects of coaching and vital to the broader responsibilities and obligations of coaches to young players. These responsibilities and obligations do not stand separately from core coaching but are very much integral to it. Therefore, the Review believes that *communication*, as a core skill, should be assessed at entry/accreditation level and ongoing in re-accreditation. It should also feature within development programmes for coaches. The Review urges that innovative and effective means to assess communication and behaviour in coaching should be put in place so that coaching practice can continuously improve and young people become more fully respected and protected.

RECOMMENDATION 85

Those with responsibility for coach education should explore the best ways of helping coaches communicate effectively with young players therefore improving their capacity to protect them as well as develop them as individuals and as players.

Consideration should be given to promoting and extending the use of body-worn camera equipment *as a professional development tool* for coaches with under-18s to monitor and improve their interactions with young players. The use of such technology should be subject to strict protocols and oversight.

Progress since the Interim Recommendations of June 2018

The Review has been advised that the use of body worn cameras will not be taken forward as these have been previously trialled at UEFA level but with mixed results. Hi-Cams are now used by the Scottish FA and have produced much better results. Peer, tutor and self-feedback and assessment is now used through the review of video footage from the Hi-Cam.

The existence of this footage is considered as part of the Scottish FA's compliance with data protection principles.

3.225. In consideration of the personal accounts of non-recent sexual abuse received by the Review, questions arose in a small number of situations where individuals were alleged to have sexually abused a young person and subsequently required to leave the club as a result - specifically, these questions concerned the onward activities of the individual once they were no longer engaged by the football club concerned.

3.226. The Review was told that, on one occasion, the individual went on to provide 'freelance' one-to-one coaching in the community. In this instance the Review could not confirm if this had, in fact, been the case. However, it is perfectly possible for young players to be attracted to the availability of one-to-one tuition and practice to supplement other training and some football skills, such as goalkeeping, lend themselves quite readily to this.

3.227. The Review did not receive any direct personal accounts from anyone alleging sexual abuse by a freelance coach but is alert to the concerns this might raise. Whether or not this is the case, the need to examine the activity of freelance coaching and the need for regulation, compliance and monitoring still exist.

3.228. The Review is aware that some ex-footballers also currently provide one-to-one coaching and tuition in community-based activities. We would not wish to create an undue level of concern about this and we also recognise the considerable value this brings. Such coaches are usually 'badged' but operate outwith the auspices of a football club or academy.

3.229. The Review believes that efforts should be made to set minimum standards for regulating this.

3.230. The Review also had some concern about the oversight of and arrangements for badged coaches who operate under the auspices of several clubs simultaneously.

RECOMMENDATION 86

The Scottish FA should conduct a full review of independent/freelance football coaching activity in Scotland with a view to developing a regime for proportionate regulation and monitoring including codes of conduct, compliance, coaching standards and PVG checks.

Progress since the Interim Recommendations of June 2018

The Review is advised that this will be considered as part of the 2021 planning cycle.

Football Academies

3.231. The creation and expansion of football academies attached to senior clubs has allowed young players to develop and hone their skills, knowledge, and ability within environments that are best able to provide resources, expertise and support to continuously improve.

3.232. Currently Academies operate under the auspices of Club Academy Scotland (CAS) which is part of the structure of the Scottish FA. Academies currently develop players from age 11 to age 18.

3.233. The finding of the Review is that the wellbeing and protection of young players and the reduction of risk should have prominence within the arrangements and delivery of academies and the academy structure. This should not be seen as an 'add on' or distinct from performance

and longevity in football but as a key issue influencing the capacity of young players to learn, improve and perform and to achieve and sustain a successful career in the game.

3.234. The Review heard personal accounts where promising and proven young players could no longer continue in football because of the impact their experiences of abuse had on them. The Review anticipates that this also applies to a wide range of other issues concerning the wellbeing of young players which, if not taken into account and responded to properly, will impact on their performance and, indeed, on their ability to continue playing.

3.235. The Review notes that some aspects of wellbeing and protection are integrated into the minimum criteria areas for clubs to be compliant with to be awarded Performance Academy status. However, similar to our observations about club licensing, the Review concludes that these criteria (as they apply to the wellbeing and protection of young people and the reduction of risk) should be elevated. If this is implemented, then evidence supporting these criteria should therefore be drilled down into more deeply during compliance audits leading to the consideration of academy status.

3.236. For example, rather than requiring that a club “shall produce a Club Child Protection Policy” and communicating it throughout the Academy and ensuring it is updated and reviewed regularly, the criteria should also be based on a standard concerning the *content* of the policies and measurement of its implementation and outcomes. In other words, the true commitment to and quality of wellbeing and protection should be under scrutiny and not completing tasks which could be seen as ‘box ticking’.

RECOMMENDATION 87

Wellbeing and protection principles and practice should be a central and prominent aspect of club football academies and the academy structure in Scottish Football. The Review recommends that the level of criteria for wellbeing and protection by club academies in relation to the awarding of performance/elite academy status should be raised.

Progress since the Interim Recommendations of June 2018

The Review has been informed that the Audit criteria for Club Academy Scotland has been raised for 2020 (the final year of a three year audit cycle) to bring it in line with member Clubs. New criteria have been drafted for the next cycle - 2021-23 and will be considered by the Professional Game Board in the first half of 2020.

RECOMMENDATION 88

CAS staff charged with the responsibility to conduct audits of academies or clubs applying for performance/elite academy status should receive proportionate training in the wellbeing and protection of young people and reducing risk. Their training and development needs should be agreed in accord with the Training and Development Pathway.

Progress since the Interim Recommendations of June 2018

The Review understands that Audits are carried out by the Licensing staff and awarded by a sub-committee of the Licensing Committee. Related training needs will be considered as part of the Learning and Development Framework.

RECOMMENDATION 89

It is recommended that, in the conduct of considering and awarding club academy status, Club Academy Scotland will engage and utilise the expertise of Scottish FA wellbeing and protection staff to assess /agree compliance of clubs.

Progress since the Interim Recommendations of June 2018

The Review is advised that the Scottish FA Wellbeing and Protection Department staff are now involved in the development of audit criteria and work closely with the Licensing team throughout the audit process.

3.237. The Review also considers it desirable that club academies involve young players in the decision-making processes of the Academy and take their views into account. A model of participation of young people should therefore be adopted across the academy structure. It is our view that this should extend beyond seeking and considering their views on protecting young people to all areas of design and delivery which affect their wellbeing and experience of participating in football within a performance/elite academy.

RECOMMENDATION 90

All Football Academies should consider establishing a Young People Council or any equivalent mechanism to facilitate the participation of young people across club and academy delivery (not just safeguarding issues) including peer support, mentoring, consultation, and any policy matter affecting them etc.

Progress since the Interim Recommendations of June 2018

The Review understands that the Scottish FA's Participation and Engagement Officer is working with Hibernian FC to implement a Youth Council. This structure will act as a pilot and once evaluation has been completed, a resource pack will be published by the end of 2020 to help other Clubs and Associations to set up their own Youth Councils. Club Licensing criteria for 2020 includes a self-assessment against the SportScotland standards in relation to participation.

Participation of children and young people

3.238. The Review placed considerable importance on engaging with young players to seek their views concerning their own experiences in Scottish football and contributing to the learning of the Review.

3.239. We also highly value a model of young people's participation anyway with a fundamental view that young people should be engaged in contributing to the development of wellbeing and protection processes and, importantly, in participating in shaping Scottish football as a whole.

3.240. The Review was interested in current approaches in football to young players wellbeing and protection and commissioned the Children's Parliament to facilitate two workshop sessions with young people at two different football academies in Scotland. We agreed that young players would be engaged in discussion about 'trust' and 'relationships' in Scottish football since these were key issues featuring in the personal accounts of non-recent sexual abuse in Scottish football provided to the Review. A total of 31 boys and 3 girls took part in activities that helped them understand their rights and share their opinions about participation in football. The young players talked about what helps motivate them, makes it fun and helps them feel successful and safe. They also discussed what they would like to change.

3.241. It is clear from the consultation that young people derive a lot of positives from their experience of playing football, feeling connected with others, developing discipline and being proud of representing their club are all important factors in building resilience for young people.

3.242. However, the young players described the enormous pressure to do well; the sacrifices they have to make; their dreams of achieving a professional career and the potential for disappointment if this does not materialise. It was noted that adults (parents and coaches) around the young person make decisions for them from an early age and therefore this power must be handled with great responsibility and respect. The Review has heard from those who have in the past been negatively affected by adults who exploited this power and betrayed their relationships with young players in the most appalling manner. Scottish football needs to be mindful of the responsibility to promote the holistic needs of children and young people and to consider their development overall.

3.243. Coaches were identified by young players as key to keeping them safe:

“I can trust these people, they are kind, they make me feel welcome” (young player)

But they also offered examples where this interaction can still be negative:

“the other day a referee called me a bad name – I don’t know why” (young player)

“...you get hurt and are crying and they say ‘stop crying’, that doesn’t help and then you start playing worse” (young player)

3.244. This suggests that within coach education areas such as child development, positive interaction/communication and building resilience should be addressed in addition to the technical skills required in coaching football. The Review considers all of these as vital to helping young people learn, develop, and improve. Ongoing continuous professional development and monitoring of standards for coaches is as important.

3.245. Football culture also plays a significant role in shaping young players. The implication that expressing pain and emotion is somehow viewed as ‘weakness’ require broader exploration. This links directly to the need for Scottish football to promote good mental health

3.246. The Review has been impressed by the use of ‘go-pro’ cameras at one football academy which provides constructive feedback and learning on coach interaction and communication with young players. This promotes transparency and is a positive tool to aid coach development.

3.247. The Review believes that lessons can continue to be drawn from engaging with young people and valuing their participation in and contribution to continuous improvement.

“if someone makes you happy and says good things and are positive, you can use the happiness to praise someone else” (young player).

3.248. The wellbeing of young people is, in the opinion of the Review, inextricably linked with their performance and Scottish football should ensure that protecting young people and promoting their wellbeing is a core aspect of football delivery and improving performance. We have been encouraged by hearing a number of coaches in Club Academies echo this view and it is clear that it is increasingly seen as integral to good coaching practice.

The full Children’s Parliament report can be read in the Appendices.

3.249. The Review urges the Scottish FA to continue to develop and embed consultation and participation of young people across decisions and delivery including but going beyond issues

concerning their protection and wellbeing. The Review was encouraged that the post of Youth Engagement Officer already existed within the Scottish FA Wellbeing and Protection Team.

RECOMMENDATION 91

The Scottish FA and its constituents should undertake further and regular participation exercises with young players in partnership with the Scottish Children's Parliament and others so that their views and perspectives are embedded into all plans and measures to improve the wellbeing and protection of young footballers ongoing.

Progress since the Interim Recommendations of June 2018

The Review understands that “participation’ is one of the five strategic priorities within the 5 year strategy. The Scottish FA now undertakes annual consultations with Performance School players.

Consultation with supporters.

3.250. Probably the largest constituency of interest in Scottish football are supporters themselves and the Review is aware of the increasing involvement and participation of supporters in the governance of Scottish football including associated community engagement legislative provision. Since the issue of sexual abuse in football (as a result of high levels of media interest and public concern) is critical to the reputation of the game and its public credibility the Review saw it as essential to invite supporters to provide their own views and suggestions. Through Supporters Direct Scotland an online survey was posted so that individual supporters could participate in the Review and their views obtained.

3.251. 65 supporters responded to the survey and the majority of those were aged 50 and over. Everyone who completed the survey indicated that they were aware of the current issues of child sexual abuse in Scottish Football and they had become aware through the press, social media and television.

3.252. 54% of those who completed the survey said that they were concerned about child protection in Scottish Football. Supporters were most concerned about the training of staff and volunteers, followed by policies and procedures and disclosure checking. They indicated that they felt that young players are at greatest risk in *youth football* and at least risk in community football. Most supporters said that they knew nothing of their own club’s child protection policies or only a moderate amount.

3.253. Regarding what could be improved a number of supporters would like to see more transparency and spoke of various ways to publicise the club’s child protection policies.

“Have articles on the website and on match day programmes” (supporter).

3.254. Some felt a public campaign might raise the profile of the issue and others felt that it was important that parents/carers are educated about policies and child protection issues. Some felt that supporters should not require to be kept abreast of details about policy but that this should be implicit within the role of the Scottish Football Association as the governing body.

3.255. In terms of protecting children in the future some supporters felt that the structure in Scottish Football hindered progress.

“Remove the antiquated committee structure and bring it forward into the 21st century” (supporter).

3.256. Acknowledgment of past failures was also important in creating a culture of honesty and respect.

“Make it no longer acceptable for child abuse to be swept under the carpet, victims must see that the truth is exposed and be supported to the full” (supporter).

3.257. Some supporters also talked about the need to open channels of communication with players either through an independent process outwith football or via existing helplines for children in order that they can raise any concerns.

“The culture of being intimidated and scared to come forward must change” (supporter).

3.258. It is clear from the consultation that some supporters are concerned about child protection and the safety of young players. Scottish Football also has a responsibility to those who attend matches to reassure them that their club is at the forefront of keeping children and young people safe. The Review suggests that clubs could extend their leadership to openly addressing issues such as child protection, mental health, homophobia etc, in raising awareness among supporters’ groups to encourage a climate of inclusion and respect as well as through their community outreach activities and programmes.

Bystanders

3.259. In almost every personal account received and considered by the Review it was clear that the thinking and behaviour of *bystanders* was crucial. Bystanders are often more than simply onlookers. They are sometimes key to creating or contributing to an environment which can either prevent or permit abuse.

3.260. The importance of bystanders and their power to influence events is well acknowledged across a wide range of areas including anti-social behaviour, bullying, sexual harassment, racism, homophobia and gender/sex-based bias and violence.

3.261. In many of the situations of non-recent sexual abuse considered by the Review the role of bystanders was crucial in determining what was done or not. The bystanders in these situations included, in the main, people with general and specific suspicions, even knowledge, about the sexual abuse and exploitation of young people in Scottish football.

3.262. Bystanders included other young players, coaches, team officials, parents and members of the community.

3.263. The Review concludes that, from a preventative point of view, interface and intervention with people who may be bystanders in circumstances of possible or actual abuse are crucial and should form a central aspect of future prevention of abuse and reduction of risk.

3.264. Essentially the Review believes that bystanders, with the right information and empowerment, can do much to protect young people. This is especially, though not exclusively, true of young people themselves. The place of young people as confidants and close observers makes them vital protagonists in the *prevention* of sexual abuse and exploitation. Whilst they are not responsible overall for confronting the issue of sexual abuse in Scottish life and remedying this they certainly need to play an important part in prevention. Their proximity to each other and the shared concerns of their peer group make them well placed to pick up on signals, information and indicators that are sometime hidden from adult view. What is required for them to take proportionate action (of whatever sort) is good information and particularly *permission and empowerment*.

3.265. So often the personal accounts provided to the Review spoke of young players who responded to their experiences and their concerns through banter and bravado. This peer behaviour was often enough to silence those who were experiencing sexual abuse and the

Review speculates that a significant number of young players who we think of as ‘bystanders’ may themselves have had experiences of sexual abuse and sexual assault (or very close calls) but have never articulated these directly. Targeted and specific interventions with young people who may be bystanders can move them from a problematic or even neutral response to one which is proactive and preventative.

3.266. The same applies to adults. The Review considered a number of situations where it was apparent that other adults held suspicions about an individual’s activities but took no action to deter, prevent or intervene to stop sexual abuse from occurring or recurring. There are a number of issues relevant to this including the strong and powerful dynamic of “denial” (a defence mechanism where confrontation of a problem or a real issue is avoided by either denying the existence or the gravity of the problem or reality. This can often take the form of complete refutation or being biased in favour of the least ‘problematic’ conclusion or the conclusion requiring the least likelihood of repercussion for the bystander). Denial permeates public thinking about sexual abuse even today when there is so much more awareness and public concern than there was in previous decades. A significant contributing factor is that most sexual abuse takes place in the context of a relationship of trust and responsibility between children and adults - including parents. This is not neutral territory and other adults are often swayed by their tendency to disbelieve that someone who they know and often like might be responsible for harming children. They also process information with a priority on how disclosure might affect them personally. This was almost certainly a significant factor in relation to the role of bystander adults in non-recent sexual abuse in Scottish football.

3.267. The Review concludes that a ‘bystander’ approach should be adopted within and throughout Scottish football which has benefits in a broad range of areas beyond the prevention of sexual abuse including bullying, homophobia, racism and gender-based discrimination and violence. The Review commends the work of organisations such as the Violence Reduction Unit in piloting and developing this approach with young people in Scotland and strongly suggests that the Scottish FA enter into discussion with the VRU in taking this issue forward.

RECOMMENDATION 92

The role and influence of bystanders in both identifying and preventing sexual abuse is significant and this has been borne out in the personal accounts provided to the Review. Bystanders include both peers and adults including parents.

The Review recommends that the Scottish FA this adopts a bystander approach and integrates this into all awareness strategies and campaigns, training programmes, policies and procedures.

In doing so the Scottish FA should draw on knowledge and experience from other areas where this has been applied including the work of White Ribbon Scotland and Mentors in Violence Prevention/VRU etc.

Progress since the Interim Recommendations of June 2018

The Review has been informed that the Scottish FA Wellbeing and Protection Department and some member CWPOs received initial training from agencies including the Violence Reduction Unit in 2019. Further discussions are taking place with VRU in relation to training and a further proposal is awaited alongside future discussion with the VRU.

Services for people affected by sexual abuse in Scottish football

3.268. Elsewhere in this Report the Review has noted our belief that many people who have been personally and directly affected by sexual abuse in Scottish football in the past have still not come forward to either the investigating authorities or to the Review.

3.269. Furthermore, we looked at the barriers and obstacles that exist which form a very serious consideration in deciding whether to come forward or not.

3.270. The Review also acknowledges that many will have experienced issues and challenges in other areas of their personal lives which are related to, if not directly attributable to, their experiences of sexual abuse. Some may have sought services to help with these issues but without identifying their past experiences or realising they might be related. These include possible mental health problems such as anxiety and depression; substance abuse and alcohol related problems; anger; violent behaviour; domestic abuse; gambling and other addictions; sexual dysfunctions etc.

3.271. Many others will not have sought out services to deal with difficulties because they fear that this may lead to a direct confrontation with the painful experiences of the past and simply have tried to deal with issues privately with varying degrees of success.

3.272. Some of those who have faced these issues and challenges will include people who have gone on to have successful careers in professional football and achieved a high degree of public profile and admiration as a result.

3.273. The Review is acutely aware of the accountability of the clubs concerned and of the Scottish FA and the responsibility this places on all of Scottish football to ensure that anyone who has experienced sexual abuse in the past receives the right response now including access to a level of support and assistance which is right for them and able to effectively help them.

3.274. The Scottish FA, in response to allegations of non-recent sexual abuse, immediately put in place a 'pathway' for the needs of those coming forward to be assessed and met. The Review appreciates the efforts of the Scottish FA in doing so and the value of this to some individuals but also notes that for others this has not been clear or sustainable.

3.275. Given that the Review is convinced that many people who have been affected have not come forward we believe that the Scottish FA should ensure that a sustainable, clear, and deliverable pathway to access services and support should be developed and put in place so that in future anyone who decides to come forward can access the right sort of service promptly and easily. This should not be limited to 'psychological' support and help recognising that some individuals require other kinds of support. The needs of those personally affected should not always be conflated with the need for psychological or counselling services.

3.276. For the Scottish FA this means that there needs to be a sustainable process for managing future allegations of non-recent sexual abuse effectively and professionally and that this needs to be carried out in a way which puts the person affected *first*. Whoever acts as first contact at the Scottish FA should have the confidence and expertise to deal with *the person* sympathetically, openly, and professionally and not just act as someone who receives and processes information.

3.277. The first point of contact for people contacting the Scottish FA is crucial. It is likely that the majority of people affected by sexual abuse in Scottish football do not have 'complex needs' but some do. The first point of contact therefore should be capable of understanding and responding to a range of need and experiences. A sensitive and clear-headed response is important so that expectations are not created that cannot be met and callers are properly

‘listened to’ and their circumstances understood. It is also important for clear ‘boundaries’ to be kept so trust is maintained and the Scottish FA can be a positive and constructive help in enabling the individual to access the right services proportionate to their needs.

3.278. The Review accepts that such a capacity has not existed in the Scottish FA but advises that this be included in the restructuring of wellbeing and protection services within the Scottish FA. Indeed, where non-recent abuse has occurred through a football club the Scottish FA may wish to consider what contribution clubs might make to funding the capacity of the Scottish FA to provide a high quality and effective contact service for people who have experienced sexual abuse in football.

RECOMMENDATION 93

The Scottish FA should immediately review the arrangements in place for enabling access to services by people affected by sexual abuse in football with a view to developing a process for receiving and managing future allegations of non-recent sexual abuse in football centred on the needs of the individual as well as the proper processing of information and assessment of risk. This should include the right approach to confidentiality and the capacity to enable individuals to access the right services and exercise choice in doing so.

Progress since the Interim Recommendations of June 2018

The Review has been advised that the Scottish FA undertook a review in late 2018 and early 2019, with different options explored. A clearer pathway is now in place between the Wellbeing and Protection Department and the Hampden Sports Clinic for psychological assessments when required and possible resources have been identified for different referrals to be made depending on the issues identified. (e.g. regional counselling services, Rape Crisis, Victim Support Scotland etc.). Further work was undertaken in 2019 to ensure the Scottish FA can respond to and support survivors following the conclusion of the Independent Review.

RECOMMENDATION 94

The Scottish FA should commission and retain a professional service to undertake assessment of the needs of those coming forward in future and thereafter, as required, to provide ongoing support and mental health programmes of help/care if these are appropriate and desired. The cost should be included in the reconsideration of investment and funding of safeguarding in football.

Indeed, this arrangement should extend beyond people affected by sexual abuse in football to anyone involved in the game who experiences difficulties with mental health. Where appropriate, this should be addressed and developed with relevant partners within and/or external to football such as the PFA and others.

Progress since the Interim Recommendations of June 2018

The Review is advised that there is an ongoing process looking at different options, particularly for when a psychological needs assessment is not felt to be required by either the survivor or psychologist. This is to be concluded in the first half of 2020 and a new section added to the Wellbeing and Protection pages of the Scottish FA website. The Support within Sport programme is available to anyone working or volunteering in professional football who requires support with their mental health, including young people playing as part of the CAS programme.

3.279. The Review is of the view that the movement to bring these events and this aspect of the history of Scottish football should not be hidden from view. The need to openly address these issues within our most significant national cultural institution is clear and the conclusion of this Review should mark the first stage in this, and associated issues, being openly acknowledged and where shortcomings persist these should be remedied.

3.280. The Review has been determined to ensure that the experiences and sacrifices of those who have come forward are not lost but, instead, are openly understood as forming part of the history of football in our country. This may be an aspect of the legacy of the sport which many would want to play down or move on. The Review agrees that lessons identified should lead to permanent positive change. The greatest memorial to the failures of the past is to ensure that such events are not repeated.

3.281. However, the Review also believes that a more concrete response is required. To support people who have experienced sexual abuse in Scottish football is an emphatic and constructive testimonial to their experiences and a tangible way of making reparation. The Review concludes therefore that Scottish football should consider how this can best be done including consideration of the creation of a fund which might underwrite support and assistance for those who have been personally affected by sexual abuse in Scottish football and indeed those in Scottish football who are experiencing other mental health challenges and issues. The Review is aware of the considerable and admirable charity work undertaken by some clubs in Scotland and the tremendous positive difference this makes to community wellbeing including through the work of charitable foundations associated with particular clubs. The Review thinks that any support resources for those affected by sexual abuse in football (or wider mental health issues) might also be supported by commercial donation and sponsorship.

RECOMMENDATION 95

The Review recommends that the Scottish FA and clubs and organisations in Scottish football consider the establishment of a permanent testimonial to the experiences of and impact on those affected including consideration of the creation of a fund which might underwrite support and assistance for those who have been personally affected by sexual abuse in Scottish football and indeed those in Scottish football who are experiencing other mental health challenges and issues.

This might also be contributed to or underwritten by commercial donation and sponsorship.

Progress since the Interim Recommendations of June 2018

The Review understands that this will be considered as part of the 2021 planning cycle.

Sexual Abuse Prevention

3.282. The Review notes that there is an absence of useful information and resources related to the prevention of child sexual abuse. Issues like PVG, noticing signs of concern in children and young people, and safe practices are often included but there is no substantial prevention framework in place.

3.283. Many of the recommendations contained in this Report are aimed at making prevention of abuse and reduction of risk more effective. For example, the integration of bystander approaches into training programmes, policies and strategies. But the Review is aware that the emphasis is still on either responding to abuse that has already occurred or putting in place measures to ensure that there is no recurrence after it has already taken place. While this is

extremely important the Review believes that there should equally be a focus on preventing sexual abuse occurring in the first place.

3.284. The Review believes that effective measures for the very early identification of risk are essential to prevent the occurrence of sexual abuse. One key component of this (although not the only one) is the need to understand what risky (potentially sexually harmful) behaviour might look like in adults or indeed young people themselves. In the situations considered in Section One of this report it is evident that there were a range of behaviours and indicators suggesting that the alleged abuser was actively putting in place opportunities either to abuse or to disguise his thinking, behaviour and intentions. Had these been properly understood and addressed at the time, it is likely that at least some of the young people who were abused may have not been subjected to these experiences and the serious impact it had.

3.285. The effective prevention of child sexual abuse is predicated on changing the way that adults think and behave.

RECOMMENDATION 96

Clear and simple information and material on child sexual abuse prevention should be visible and included on the Scottish FA and club websites and in policies - this should include information on signs in adult behaviour that may indicate concern and how to respond to this (as well as sources of help to change/make safe adult thinking and behaviour).

Progress since the Interim Recommendations of June 2018

The Review understands that an update to Scottish FA website has been made to make information and resources more accessible. The policy document contains this information. The revised policy framework contains additional information within the areas noted in these areas, which will be rolled out to clubs during the course of 2020.

Culture

3.286. The Independent Review was reminded by many who contributed of the enduring 'cultural' issues within Scottish football. Culture is not static. It is dynamic – it is constantly changing - although the rate of change is often slow. The process of cultural change in Scottish football to date has in part been driven from within but it has also been importantly influenced by external factors such as wider social change and developing conditions. But many people have commented to the Review that, to create a safer and more proactive environment for the wellbeing of young people, requires far greater positive cultural change than has been achieved thus far.

3.287. This is an issue of fundamental significance. The cultural context for improvements will decide the extent to which improvements can either happen or be sustained or embedded. Conversely, it is also likely that the implementation of the recommendations of this Report will also serve to drive and underpin cultural change and may even act to accelerate it. The Review however concludes that a change in football culture is essential if the implementation of the recommendations in this Report are to be sustainable and achieve the goal of protecting young people and reducing risk.

3.288. Those who contributed to the Review commented consistently on cultural issues within football that affected both the likelihood of sexual abuse happening or the possibility of them reporting it. These are in fact substantial issues that require careful and focussed consideration.

3.289. It is notable but perhaps unsurprising that all of the people who contributed directly to this Review with their own personal accounts of sexual abuse were male. It is also notable and unsurprising that all of those alleged to have perpetrated these acts of sexual abuse were men. The Review also took into account two other contributions which involved girls although these young women did not provide direct personal accounts to the Review (instead their parents contributed to the Review process). Both instances involving young female players occurred after 2000 indicating perhaps the shift in the pattern of participation in Scottish football in recent years where more girls and women are taking part either recreationally or competitively. It is likely then that the pattern of greater female participation will be reflected in current and future reports of sexual abuse should these be made.

3.290. Yet football in Scotland remains a male dominated sport at all levels and across all domains with the exception of Women's Football. There are important examples of a growing influence of women in the game in governance and in executive positions but such examples are significantly in the minority.

3.291. It would be a mistake to think that because of the dominance of men in participation, coaching, refereeing, volunteering, decision-making, governance etc. it therefore follows that this is the sole reason why those alleged to have sexually abused are exclusively men. Men predominate the numbers of reported sexual abusers across all sections of society and activity. Where a culture is male-dominated, and its values as well as its representation reflect this, then the context is set potentially for sex-based violence and abuse to take place or to be assimilated. It is the opinion of this Review that this, to a significant degree, is what was the case in Scottish football and to an extent remains the case today. This is one reason, but not the only one, why cultural change in the sport is urgent.

3.292. It has been a common observation by this Review that the culture of football has been, and to a certain extent still is seen as, dominated by men who support and perpetuate a system of organisation, management and interaction which has not adapted successfully to wider social changes and which apparently often runs on a very narrow set of interests.

3.293. Against such a backdrop, in the opinion of the Review, sexual abuse of children and young people and failure to confront the behaviour of those responsible was made more likely. If these issues are not significantly remedied then our view is that the general context for the continuation of risk to young people is sustained.

3.294. The cultural values of the past run deep and are difficult to overcome. These values hold that 'victimisation' is a sign of weakness, 'vulnerability' is a sign of failure and unflinching resolve is a sign of strength. They are the value base of an already outmoded and obsolete view of masculinity which has dominated previous models of sporting prowess and success.

3.295. This Review has been constantly made conscious from the accounts which we have received and from the experiences and impact on those who have come forward that these issues were a very real aspect of what was done to them and the enduring impact it has had on them.

3.296. The damage which this cultural backdrop does is well understood to many in Scottish football today. Until recently it largely excluded the participation of girls and women at all levels and to an extent still does. In the past, footballing culture has effectively throttled diversity and equality, through exclusion and discrimination, to the overall detriment of the game. The culture of football has seriously impeded the pace of positive change in dealing with racism and homophobia in the modern game and this still remains a serious issue. It creates and sustains hostilities and mindsets which perpetuate, with some sections of the wider public, negative social attitudes to football and its support. The popular appeal of football is

considerable, but the values promoted and espoused by the clubs and the governing body are not always evident in the overall culture.

3.297. Increasingly people in charge of the game in Scotland are aware of these challenges and are responding. But the issues raised by this Report and which arise from the experiences of those who have been personally affected by sexual abuse only serve as an imperative that cultural change in football is not something to leave to chance but something which requires concerted action. The Review reiterates the point that without it the capacity to successfully reduce risk and protect young people is jeopardised.

3.298. The Review cannot ignore the cultural context of football and how it influences or supports attitudes and values which are potentially detrimental to the wellbeing and protection of young people. It is not acceptable for either young people or adults who have experienced abuse to be deterred from speaking out or seeking help because footballing culture implies that to do so is weak, or disloyal, or a failure. The emphasis instead should be on empowering adults and protecting young people.

3.299. The Review is of the opinion that the pace of cultural change in Scottish football requires leadership and example. The operational values of football can become consonant with its espoused values but this will require influence, encouragement and inspiration. For this to have impact, visibility is everything.

3.300. Young people especially (but not exclusively) can be influenced and inspired by heroes and mentors who reflect ideas, and values, and behaviours that are positive and affirmative. This is good role modelling. Football already has many positive examples of this.

3.301. The Review finds that this should be explicitly considered as a way to engage those who participate in and support Scottish football to become more aware, more understanding, more proactive and more involved in the protection of young people and preventing sexual abuse and exploitation. Indeed, the Review holds that this can also be extended to important associated issues such as promoting good mental health and safe behaviours (particularly for boys and men). The Review therefore believes that a recognised and credible 'voice' can go a long way to champion these issues and make a real difference through positively influencing the cultural backdrop of Scottish football. We are fully aware that there are many challenges in doing so but making these issues visible, and tangible, and real is an important aspect in helping everyone in football to make connections about how this affects *them*, their friends and families, and the game they love. It is a very visible way of stimulating discussion, inspiring change and improving wellbeing in football and in our society.

RECOMMENDATION 97

The Scottish FA should give serious consideration, in partnership with the PFA and others, to identifying and appointing a prominent figure in Scottish football to act as a 'champion' for issues concerning the protection of young people; the needs of people affected by abuse and trauma; and wider mental health issues including education; awareness-raising; public engagement and promoting key messages.

Progress since the Interim Recommendations of June 2018

The Review understands that although initial exploration this role has taken place, with various options considered, no definitive solution has been arrived as yet. There is a requirement to explore this further as part of the development of the communications strategy.

Implementation of the Recommendations of the Interim Report 2018

3.302. In June 2018 the Review submitted its Interim Report to the Chief Executive and Board of the Scottish FA. The need for an Interim Report came about primarily because the ongoing criminal cases (relevant to the accounts provided to the Review) had not been concluded at that time. To issue a Final Report without the (albeit redacted and abridged) accounts of those who had contributed would have been a serious failure and would not have provided transparently the basis for many of the findings of the Review. On the other hand, to publish while criminal proceedings were ongoing would have risked the integrity and outcome of those cases and this would not have been in the interests of justice, of the public, of those who had contributed, or the mandate of the Independent Review. Indeed, some approaches made to the Review since the publication of the Interim Report are still subject to ongoing investigation and therefore, regrettably, cannot be included in this Report for the same reasons.

3.303. The Review had conducted the bulk of its fieldwork by June 2018 and arrived at a large number of recommendations for change (although the Review continued to respond to people coming forward between the publication of the Interim Report and April 2020). These were issued within the Interim Report so that the Scottish FA and its members could immediately start to make progress putting in place a wide range of improvements without further delay. The majority of these recommendations are repeated in this Final Report although some of these have been further changed since the Interim Report. The reason this has been done is so that a snapshot of progress made regarding each interim recommendation (between June 2018 and June 2020) can be provided and the pace of improvement assessed.

3.304. The Review is encouraged by the progress made by the Scottish FA and its members in taking forward the changes and improvements recommended by the Review in June 2018 in the Interim Report. The Review thanks the Chief Executive of the Scottish FA and his staff for the hard work and dedication clearly evident to bring about implementation in respect of the recommendations of the Interim Report. The Review is well aware that the commitment of the members of the Scottish FA has been instrumental also in delivering a programme of sustainable improvement based on the recommendations of the Interim Report.

3.305. The Review is satisfied that the Scottish FA has approached the implementation of the recommendations of the Interim Report in a 'strategic' way. It was not the expectation or the intention of the Review that implementation of all the interim recommendations would be undertaken simultaneously. Instead the Scottish FA has made decisions about those recommendations where work could be initiated immediately and those that required, for a variety of reasons, to be left until future cycles of their planning cycle. This makes sense. This strategic approach should continue with the implementation of the recommendations contained within this report and, indeed, other issues which may emerge in due course.

3.306. The Review has taken particular note that a priority for the Scottish FA has been the development of a five year strategic plan for the Wellbeing and Protection of Children and Young People in Scottish Football. The Review considered the absence of a strategic plan as a major flaw in the arrangements for protecting young players in Scottish football. The manner in which the Scottish FA approached this ambitious task was impressive. A wide range of constituents were involved through a detailed process of development and consultation over a period of several months. This has produced a robust and comprehensive strategy which places Scottish football in a much stronger position to meet the challenges in implementing the scale of change recommended in this Report and beyond.

3.307. Similarly, it has been a vital development to strengthen the permanent resource of the Child Wellbeing and Protection Team (now Department) and to provide a direct line to the Chief Executive. The Review welcomes the increased stability introduced to the Team by making it a Department within the Scottish FA and by making previously temporary roles

permanent. However, the Review notes that there has been very little actual increase in the capacity or resilience of the Department other than the introduction of a post of 25 hours p.w. Given the size of the task of implementing and sustaining wholesale change and improvement the Review urges the Scottish FA to reconsider the staffing of the Department with a view to increasing staffing levels to be commensurate with the tasks and responsibilities of the Department and the challenges represented by the findings of this report.

3.308. Alongside this, the Review welcomes the early establishment of the independent Wellbeing and Protection Advisory Board and is confident that this will bring an important support and reference point to Scottish football in the process of continuous improvement which is recommended in this Report. Indeed, the Review considers this body as potentially pivotal since its capacity to monitor the type and pace of change is vital (given its independent nature) and it plays a key role in encouraging and supporting continuous improvement.

3.309. The Review does not believe, however, that the Advisory Board alone holds the responsibility for monitoring and sustaining change. Essentially this is a key aspect of *governance* and therefore the Board of the Scottish FA continues to hold the primary responsibility for driving improvements and monitoring effectiveness.

3.310. The Review welcomes the structural changes that have taken place since the Interim Report was published. However, this does not necessarily represent an increase in the “status” of the wellbeing and protection of children and young people within football. This is a cultural issue but one which explicitly represents the way people, systems and organisations “value” young people, their wellbeing and protection. The Review believes that the Scottish FA and Scottish football in general has a long way to go to remedy this and is reminded of the number of children and young people involved in the game in Scotland. Such change should be brought about not because the Scottish FA is compelled but because the governing body is unequivocally convinced (as it should already be) of the *value* of children and young people to and in the game.

3.311. The Review is also encouraged that a more structured and systematic approach is being taken to the delivery of training and development in relation to the Wellbeing and Protection of Children and Young People across Scottish football. The delivery of training however is not about “ticking” boxes or completing outputs required by these recommendations or by workplans. Training and development are *means to an end*. They create *outcomes*. Training and development are required so that people change the way they think and the way they behave and that this change is sustained. As such it is this *change* that requires to be continuously measured which is why the Review believes strongly in a programme of improvement based on *outcomes* rather than outputs.

3.312. Although the recommendations in the Interim Report (and in this Report) are the direct consequence of the findings of the Review and represent the changes we consider essential for football to improve the wellbeing and protection of children and young people they are not the whole picture. Within the text of this Report there are numerous instances where the Review makes particular points that indicate a strong need for change. Similarly, there are numerous instances where, within the text of this Report, the Review “urges” or “suggests” particular actions be taken or considerations made. These are every bit as important as the recommendations themselves. Indeed, an insightful and thorough reading of the text of this report should lead to a process of critical thinking which should, in turn, inform a tranche of other changes, developments, and improvements ongoing. This is of as much importance as the formal planning for the implementation of the recommendations themselves.

3.313. The Review therefore makes the point that to go “straight to the recommendations alone” or solely to the Executive Summary rather than take the time to read the text and digest

what the Review has been told (as well as what the Review has determined) would be a gross injustice to those who have come forward and misrepresent the process and spirit of the Review.

3.314. From the findings of the Review it is evident that there is still some scope for change and improvement across Scottish football to protect children and young people from harm and to reduce risk.

3.315. Whilst the Review has attempted to be as comprehensive as possible to allow the maximum opportunity for improvement, we recognise that the findings and recommendations of this Report do not address newly emerging problems and issues nor can it predict what other challenges might arise or be identified in future.

3.316. This is why a process of *continuous improvement* is needed. It is the belief of the Review that this can only be undertaken with the right investment, resources and organisational support.

3.317. The Review also recognises that the delivery of football in Scotland is a diverse activity involving many thousands of staff and volunteers. To initiate and monitor change and to ensure that outcomes are achieved is a complex and comprehensive task and the Review does not underestimate the challenge.

3.318. After considerable reflection and deliberation, however, the Review believes that the protection of children and young people and the reduction of risk in football cannot be achieved by cutting corners or short-termism. The lessons of the past are clear and indicate that the pace of change needs to accelerate but not at the expense of doing things properly.... that is putting the right improvements in place and measuring their impact.

3.319. For this to be effective the commitment of everyone in football, all organisations and clubs, all staff and volunteers, are players and participants, and all parents and supporters is a prerequisite. The Review hopes that this commitment is one which is shared across Scottish football and that it leads to real and sustained improvement in the wellbeing and protection of children and young people.

CONCLUSION

Approximately 49% of the child population of Scotland participate in football equating to around 325,000 children and young people (UEFA European Benchmark – Kantar (2019)). If this was solely a youth agency it would be among the largest in Scotland. The sheer scale of the participation of children and young people alone places child protection and safeguarding at the very heart of football delivery. It is however concerning that this has not always been evident from the way that Scottish football does business. Indeed, it remains a concern of the Independent Review that substantial effort still needs to be made to ensure that this situation is changed and that young people are afforded every possible protection in taking part in our national game.

The events of the past are only partly known and understood. We fully expect people to continue to come forward with accounts of abuse that has occurred in Scottish football in past years. Many will choose to remain silent or sadly are no longer alive to tell their stories. The full picture of the true extent and nature of sexual abuse in Scottish football will likely never be known.

Most young people understandably did not reveal their experiences at the time (and therefore there was little or no past awareness of these individual events in Scottish football). However, in those situations where young people *did* speak up it appears that only limited action was taken by those they told and, from the perspective of this Review and from these contributors, such action was to an extent sometimes predicated on what was best for the Club or organisation at the time rather than the protection of young people and the reduction of risk. Despite considerable improvements in the arrangements for child protection and wellbeing since then, the Review would like to see continued efforts within Scottish football to ensure that this issue has been addressed satisfactorily. It is our view that, even currently, considerations within clubs do not always place the protection of young people as paramount rather than, for example, the reputational interests and concerns of the club itself or individuals within it. This is as much a cultural issue as it is systemic and structural but one which urgently needs to be changed.

Similarly, the Review has found that even although individual occurrences of sexual abuse were not reported to those with responsibility for football delivery (and with responsibility for the protection of young people) there was sometimes apparently some ‘suspicion’ about the activities of some of the (alleged) abusers. On occasion this took the form of other young people sharing information, innuendo and anxieties between themselves but in full view of the adults responsible for their care. On other occasions adult bystanders themselves witnessed activities that were of concern and they should have acted on this rather than either passively disregarding it or, sometimes, openly minimising or trivialising it. Sometimes ‘suspicions’ ran higher and were predicated on more than simple hearsay but on actual information or observation that was either only half-understood or were treated with ‘denial’ and even scepticism.

The argument that wider public concern and knowledge of child sexual abuse at the time meant that understanding and actions were very different to those which would occur now does not, in our view, stand up. Irrespective of what was widely understood about child sexual abuse in the 1970’s, 80’s and 90’s there was, throughout that period, a clear understanding in society of what constituted a duty of care to young people. It is our finding that it is this that was not fully evident in the considerations and actions of those within football at that time.

In the early 2000’s Scottish football began to address some of the structural issues which might help to better deliver protection for young players. The Review found that these were often relatively random and mostly due to the right people being in the right place at the right time rather than any discernible strategy taking into account all of what needed to be done, how it should be done, when it should be done and how outcomes would be measured. The absence

of a coherent and comprehensive Child Protection/Wellbeing Strategy in an area of provision with a vast and continually growing number of young participants was a contributory factor.

In recent years the pace and quality of change in the capacity of Scottish football to protect young people has escalated and increased and the Review is encouraged by this. Most of these changes were previously due to external 'drivers' such as PVG legislation, Minimum Operating Standards for Sport, external audits and governmental priorities. Consequently, it remained the conclusion of the Review that change instead should be driven by a vision, a commitment and a resolve *within football itself* and not simply be 'reactive'. The Review therefore would like to see consistent and continuous measures to improve the protection of young people and the reduction of risk which are *proactive* and *preventative*. These may start with the recommendations of this report and its predecessor interim report, but they do not end there. This report, and the improvements it urges, are intended only to be the beginning of an organisational and cultural transformation which the Review believes is necessary if the wellbeing and protection of the large numbers of young people in football are to be prioritised and assured.

The consequences of not progressing with urgency and making/sustaining the right changes and improvements are now well understood. These are starkly evident from the personal accounts provided to the Independent Review and referred to in this Report. These accounts alone should be enough to inspire and motivate change without question or inertia. The price for not pursuing an explicit and collective duty of care to young people in the past has not been primarily borne by the institutions of football but by those who were personally affected young people with limited choices, little support, and few safeguards. The price they have paid has often been lifelong, frequently serious and sometimes catastrophic. The collateral damage caused to their relationships, their employment, their physical and mental health and their social wellbeing is incalculable. This should be constantly kept in mind by those in Scottish football when considering the findings of this Report, our recommendations and planning the way forward.

The Review has been impressed by many individuals in Scottish football who have contributed their views, information and suggestions. These people are the backbone of the game and the Review has been encouraged by the commitment of many of them to the protection of young people and the reduction of risk. They are in grassroots football and in football organisations and senior professional clubs; they are coaches and managers, officials and supporters, players and parents. There is considerable individual commitment to the protection of children and young people and a lot of ideas for improvement. Scottish football requires a structure and a culture capable of harnessing this. But the need for structural, systemic and cultural change runs deeper. It is the conclusion of the Review that the measures necessary to create an organisational and participative environment which is fully capable of properly protecting young people as well as preventing sexual abuse demand that accountability is clearly held, and responsibility is consistently met. It should also be clear to all that the wellbeing and protection of children and young people and the reduction of risk are clear and genuine priorities. These are not ancillary issues but ones which are central to the future of the game.

The Review has also been extremely grateful for the participation and interest of people who were part of Scottish football in the past and who retain a strong and enduring commitment to the game. None who have spoken to the Review has sought to excuse the failures of the past but instead have openly and honestly acknowledged shortcomings and urged that we learn from them. Some have been left personally affected by the realisation that past inaction or inertia have potentially contributed to serious harm of young people and with some abiding sense of regret that perhaps their eyes (individually and collectively) were not "on the ball" at the time with negative consequences which have, until recently, been largely hidden from view.

Mostly however the Review has been inspired and motivated by the contributions and involvement of those most personally affected and by those of their families and friends. Without exception the Review has endeavoured to listen to everything they have told us and to

hear clearly what they are saying. This has been central to the conduct of the Review and its conclusions. From these accounts we have not only learned about the past but, equally importantly, have had a light shone on the present. These contributions have provided the grounds for our findings and the backdrop for most of our recommendations. The undertaking given at the start of the Independent Review was that an unwavering commitment to ensuring that these experiences are never repeated was an important way of delivering justice to those who have been harmed. The most enduring testimonial to those who have been so intimately and profoundly affected by this issue is that young people now and in future are not exposed to the same risks and that these or similar experiences are not repeated.

The decision to release an Interim Report in June 2018 has been vindicated. This has allowed the Scottish FA and its members to forge ahead without delay in making improvements and drawing together a strategy for future change. The Review is impressed by the work undertaken so far but reiterates that there is a long way still to go and that the delivery of the recommendations of the Review are part of, but not the whole picture. Through processes of consultation, partnership, auditing, reporting, discussion, partnership, and communication Scottish football should always be prepared to be open about its shortcomings and commit itself to continuously improving in contributing to the wellbeing of children and young people and ensuring their proper protection.

In the latter stages of the Review, in further consultation with some of those personally affected, we were asked who is responsible for ‘enforcing’ the recommendations of the Review and who is responsible for making sure the legacy of these events (and of this Review) is addressed. Our response was unequivocally that it is first and foremost the job of the governing body to take this forward. In particular its Board, its staff and its members. However, the Review has also been explicitly clear that those who have contributed to this process of learning have an abiding responsibility to ensure that this happens by asking questions, expecting answers, and insisting on full transparency. Equally this can and should be done by their allies in their families and communities and in the media as well as by the wide range of stakeholders with an interest in Scottish football. The position that football enjoys in the life and culture of our nation requires nothing less.

The Independent Review has been privileged to act as a voice for those who previously felt they had none. Equally we see it as a considerable honour to have been given the task for discerning lessons from these accounts and to be able to put our findings and recommendations to the Scottish FA, the Scottish Government and to the Scottish public.

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Lead

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July 2020

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Elsewhere in this Report we have acknowledged the contributors across Scottish football who have given their time, recollections and ideas and would like to thank them for their involvement.

The Review has also taken pains in this Report to acknowledge the contributions of those who have come forward especially those who have shared their experiences including family members and friends. The process and findings of this Review have kept these at the heart of our deliberations. We acknowledge their courage and express our immense gratitude for helping us to learn from the experiences of the past with a firm and unwavering eye on making things so much better for young people in future.

Finally, during the course of the Review, a contributor lost his life in a tragic accident while on holiday in Australia. He had communicated with us several times before going on holiday and arranged to meet with us on his return. Sadly, this did not happen. However, the Review has been determined that his 'voice' be heard and we are very grateful to his mother, sister and best friend for helping us ensure that this is the case. Similarly, the Review acknowledges with gratitude the contribution of another contributor whose account we could not include for legal reasons and who also died due to ill-health in the closing stages of the Review.

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Appendix 1 - RECOMMENDATIONS OF THE INDEPENDENT REVIEW OF SEXUAL ABUSE IN SCOTTISH FOOTBALL

RECOMMENDATION 1

The Independent Review recommends that the clubs and organisations concerned, including the Scottish Football Association, issue an unequivocal and unreserved public apology to those who have been personally directly affected by sexual abuse in Scottish football. This apology should be on behalf of the club/organisation itself as well as the wider football family.

Furthermore, clubs and organisations concerned should openly acknowledge the impact of these events on those affected and the enduring effect this has had on them (and their families) into their adult lives.

RECOMMENDATION 2

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

The Review recommends that the Children and Young Peoples Protection and Wellbeing team at the Scottish FA work closely with the Diversity and Inclusion Manager to develop and deliver effective joint strategies, approaches, materials and interventions to combat homophobia in Scottish football. This should be done as both a vital contribution to improving equalities and participation in football and also to bring about the cultural and organisational change necessary for young players safety encouraging them to be open about personal challenges or issues of concern including risk of sexual harm.

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

RECOMMENDATION 3

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

It is recommended that all clubs and academies, with the assistance of the Scottish FA and the relevant ANA put in place proper processes of due diligence in all cases focused on the welfare and safeguarding of young players to respond to unexplained/undetermined changes in behaviour or decisions to leave.

RECOMMENDATION 4

The Review recommends that representations of 'vulnerability' in training, policy, public materials, campaigns and targeted intervention in Scottish football (and in sport in general) should take full account of young people who do not conform to predominant stereotypes of 'vulnerability' especially in relation to how they may become exposed to risk of sexual abuse or exploitation in a football context.

RECOMMENDATION 5

The Review is acutely aware that it is likely that many people personally and directly affected by sexual abuse either in the past or more recently have not come forward.

It is of vital importance that barriers, whether real or perceived, are identified and removed which militate against people coming forward to get help or seek justice or personal resolution.

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

RECOMMENDATION 6

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

It is recommended that **all** staff (whether professional players, managers, coaches, support staff, volunteers or whoever) are made aware of how to respond both interpersonally and in terms of onward safeguarding to personal revelations of experience of sexual abuse or other possible mental health problems.

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

The Review believes that changes in attitude are essential to create a culture capable of listening to and supporting team members. This should include helping all team members understand how to respond to peers constructively demonstrating solidarity and support to their teammates and others who may need it.

All staff and players must be helped to understand how to assist someone affected by sexual abuse (or indeed wider mental health issues) in the first instance but also to follow through on duty of care, safeguarding and other responsibilities. This should include proportionate information and training across the club on 'trauma informed responses' etc.

RECOMMENDATION 7

Safeguarding of children and young people carries a high degree of 'organisational risk' and should therefore be a clear and priority aspect of governance within Scottish football. The SFA Board should therefore consider the need for:

- Appointing a Director with a portfolio lead for the safeguarding and wellbeing of young people
- Receiving and considering regular reports on safeguarding at all Board Meetings
- Reporting on safeguarding issues and improvements at Annual General Meetings

RECOMMENDATION 8

All Board Members should undertake targeted but comprehensive safeguarding training either retrospectively or as part of induction. Their ongoing needs for supplementary training and development should be included in the training and development pathway.

RECOMMENDATION 9

The Scottish FA should take steps to establish an independent Safeguarding Advisory Board to both advise the Scottish FA and its constituents on safeguarding development, policy and

strategy and to act as a mechanism for overseeing and monitoring the implementation of recommendations for continuous improvement.

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

It should also comprise members from outwith football and be chaired by a person independent of football with safeguarding expertise.

RECOMMENDATION 10

Concern exists as to the status and relevance of the ILS in relation to Scottish Football, specifically the relevance to Scottish legislation, social policy and organisations including the SIS standards. A review of this should be undertaken jointly between the SFA, the ANAs, Sportscotland and the Safeguarding in Sport Service (Children 1st).

RECOMMENDATION 11

An urgent review of the Scottish FA affiliate membership structure should be undertaken with a view to reform. This should place centre-stage the need for lines of accountability to be clear, concise and transparent and demarcation of responsibilities in safeguarding of children and young people to be exact and clearly defined.

RECOMMENDATION 12

The Scottish FA Handbook should be updated to include a section on the wellbeing and protection of children and young people containing the requirements related to standards and required compliance.

The contact details of CWPO's in clubs, ANA's and the Scottish FA should also be included within lists currently provided within the Handbook.

RECOMMENDATION 13

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

In the first instance a 5-year strategy for the wellbeing and protection of children and young people should be put in place covering all aspects of delivery and improvement and clear timescales for achievement of goals, objectives and outcomes.

RECOMMENDATION 14

To accompany the 5-year strategy, a communication strategy should be developed and put in place to ensure buy-in and the full commitment and participation of everyone involved in the game.

RECOMMENDATION 15

The Scottish FA wellbeing and protection capacity should be subject to increased and improved investment and resourcing on a longer-term basis. This should include an expansion of current staffing and resources. The Review recommends that the Scottish FA conduct a comprehensive review of the desired and appropriate roles and tasks of the safeguarding team based on desired outcomes and the content of the 5 Year Strategy including:

- Young people's participation and children's rights
- Training and development
- Compliance/quality assurance and evaluation
- Policy
- Consultation and support for affiliates, clubs and members

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

RECOMMENDATION 16

Consideration should be given to greater prominence and effectiveness to the Child Wellbeing and Protection Team in the Scottish FA. This should include consideration of creating and tasking a Wellbeing and Protection Department within the Scottish FA headed by a Head of Department.

RECOMMENDATION 17

Commercial sponsors should be made alert to wellbeing and protection issues and arrangements in the Scottish FA, ANA's and Clubs as part of their ethical and social responsibility agenda concerning investment and sponsorship. As such any activity to attract sponsorship, investment and funding should factor in the efforts and achievements of Scottish football in ensuring the wellbeing and protection of young people in all aspects of the game to reinforce investor confidence.

RECOMMENDATION 18

The Review recommends that the 'Standards for Child Wellbeing and Protection in Sport' are embedded into a Wellbeing and Protection Strategy for Scottish Football with a view to ensuring that any achievement and progress is measured against the Standards on an ongoing basis.

RECOMMENDATION 19

All 'managing concerns' reviews should be undertaken after **every** concern case as part of a self-evaluation process within each club. The results of each review should be communicated to the Scottish FA who should hold responsibility for analysing these and integrating them into an overall assessment of child wellbeing and protection practice and improvements.

RECOMMENDATION 20

A Wellbeing and Protection Training and Development Strategy for all of Scottish Football should be developed jointly between the Scottish FA; ANA's; Clubs (Professional & Grass Roots); and involve external partners such as Children 1st and Sportscotland

RECOMMENDATION 21

A Training and Development Quality Assurance system for wellbeing and protection should be developed and implemented which ensures that training and development programmes have positive outcomes in the continuous improvement of safeguarding in Scottish football.

RECOMMENDATION 22

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

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

RECOMMENDATION 23

All induction for staff/volunteers/board/management and players across Scottish football should include input on safeguarding (as reflected in the Training Pathway at an appropriate and proportionate level).

RECOMMENDATION 24

The Scottish FA in conjunction with clubs and others should develop or provide a proportionate programme of awareness for parents and caregivers about how sexual abuse or exploitation occurs and how grooming might be carried out including how parents and adult bystanders might also be groomed. Such awareness should be proportionate, informed and accessible and form an important focus for partnership and good communication between the Scottish FA, clubs and parents/caregivers.

RECOMMENDATION 25

All club policies on the Wellbeing and Protection of Children and Young People should have an introduction from CEO/Board Chair or both.

RECOMMENDATION 26

Clubs should not simply adopt and rebrand the Scottish FA Wellbeing and Protection Handbook or any other template policy or procedure without doing more to ensure it is integrated into the identity and delivery of the club itself. There is a need for clubs and organisations to 'bespoke' policies to their individual clubs needs and conditions without compromising the consistency of core requirements across Scottish football. The Review recommends that all clubs and organisations revisit their documents and policies to ensure that the structure and identity of their club is clear and consistent throughout with the branding and ownership of the policy clear in their presentation and the delivery.

All such policies and procedures should clearly reflect the vision and values of the particular club and its community.

RECOMMENDATION 27

To prevent confusion and promote consistency all safeguarding policies should be known by the same title across all clubs and organisations.

RECOMMENDATION 28

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

RECOMMENDATION 29

The definition of 'child' should be clarified and consistent across all Wellbeing and Protection policies and processes in Scottish football.

RECOMMENDATION 30

The Scottish FA should refer to the spirit of the 'relationships and position of trust' legislation with a view to broadening the 'relationships' definition within organisation and club policies and handbooks. Clubs, with the assistance of the Scottish FA, should also ensure that this is reflected in Codes of Conduct for particular roles.

RECOMMENDATION 31

Club Policies and Procedures should directly and explicitly make clear that they apply to *all* children and young people participating in club activities and delivery in any way, not just young players.

RECOMMENDATION 32

Reporting and management of concerns processes should be standard, simple, and clearly set out in all Wellbeing and Protection Policies.

RECOMMENDATION 33

Consideration should be given to making club and organisations wellbeing and protection policies/handbooks as user-friendly as possible - this should include separating out recruitment materials (e.g. codes of conduct; application forms etc) from the core handbook.

RECOMMENDATION 34

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

RECOMMENDATION 35

Consideration should be given to the development of a template or standard 'Terms of Reference' to assist any club who may wish to embark on internal review related to specific wellbeing and protection concerns or allegations whether recent or non-recent.

RECOMMENDATION 36

No section in any policy should be titled '*Protecting Yourself from Allegations of Abuse*'. Where this is the case this should be remedied immediately by clubs and organisations. The Review recommends that the term 'Safe Working Practices' is adopted instead and that the content of such policies is made consistent with this term.

RECOMMENDATION 37

The protection of children and young people online and the use of social media should be included and embedded in club and organisations wellbeing and protection policies across Scottish football.

RECOMMENDATION 38

Standards of expected behaviour on social media should be included and clear requirements set in all *codes of conduct* at all levels in football including in the professional game and including communication by club players and staff with young people outside of football.

RECOMMENDATION 39

'Stand-alone' social media safe practices and guidance for Academies and Youth Football should be developed and put in place.

RECOMMENDATION 40

The Scottish FA should conduct a review of the arrangements for photography, visual recording and video analysis concerning young players in all settings across Scottish Football including the regulation and monitoring of this and the use and storage of photographic/recorded images of young players with a view to developing and putting in place consistent standards and practices.

RECOMMENDATION 41

The SFA should draw up guidance on risk assessment (Including processing blemished PVG reports) for all clubs and covering the makeup, responsibilities and expertise/training of risk assessment panels

RECOMMENDATION 42

Consideration should be given to centralising Risk Assessment functions on behalf of clubs and ANAs including referral to the List; critical cases; liaison with investigatory authorities; and developing a single 'clearing house' /process discernment for all blemished disclosures and cases of concern through a single, central system/mechanism invested with the right expertise and supported by procedures and processes that are proportionate and fit for purpose.

RECOMMENDATION 43

Consideration should be given to grassroots football clubs *sharing* risk assessment capacity, perhaps on a district/regional basis as part of the consideration of centralising these functions.

RECOMMENDATION 44

The Scottish FA should undertake a comprehensive review of roles and posts across Scottish football to clarify categorically those which require PVG checks and those which don't in terms of current legislative provision and the definition of 'regulated work'.

Where anomalies or contention arises as a result of such a review, the Scottish FA should, on behalf of Scottish football, enter into discussions with the Scottish Parliament and Disclosure Scotland (as the relevant arm of Government) to address and rectify these promptly and clearly. Confusion or lack of clarity about 'regulated work' and how it applies to those engaged in the delivery of football in Scotland should be eliminated.

RECOMMENDATION 45

Where notification of an individual for listing to Disclosure Scotland is a possibility, consideration should be given to this being undertaken through a single 'clearing house' within Scottish football so that individual cases are tracked and subject to consistent processes and to facilitate statistical reporting and analysis.

RECOMMENDATION 46

The Review recommends that the Scottish FA scopes existing provision for safe recruitment training in Scotland and thereafter ensures that all recruitment and appointment processes reflect expected standards of safeguarding. Consideration should be given to relevant HR staff undertaking safe recruitment training so that this features prominently in the execution of HR tasks and roles. The Review further recommends that all recruitment/appointment panels should comprise at least one member who has successfully undertaken relevant and accredited safe recruitment training.

Where applicable consideration should be given to the practicalities of extending such safe recruitment standards (beyond PVG checking) to the recruitment of volunteers.

RECOMMENDATION 47

There should be a standard role and person specification for Child Wellbeing and Protection Officers across all clubs which make clear the requisite expertise and knowledge base for undertaking this role.

CWP Officers should be recruited and appointed on the basis of their knowledge, skills and experience in relation to the safeguarding of children and young people and not solely on the basis of their previous broad professional or occupational roles outside of football.

RECOMMENDATION 48

In senior professional clubs* the Wellbeing and Protection Officer role should not be an "add-on" to other functions/roles within clubs but should be a dedicated salaried post (whether full-time or part-time) within the club.

In Tier One and Tier Two Academy clubs the Review recommends that these posts be full-time partly because of the extent of Academy responsibilities but also including where there are also

established community outreach programmes; out-of-season activities for young people etc. In remaining clubs (Tiers Three and Four) economies of scale should be considered and applied whereby clubs can share resources and personnel effectively and share the costs.

**Clubs with Football Academies at Tier One, Two, Three or Four.*

RECOMMENDATION 49

CWPO's should be visible across all club functions events and activities concerning children and young people's participation and competition including interface with parents.

Club CWPO's should be identifiable and visible at all events where they are present or have a role. This should include making themselves known to everyone involved in the Club (parents, players, coaches, staff, etc) on an ongoing basis.

Some Club CWPO's wear clear identifiers such as branded clothing, badges etc so consideration should be given by all clubs to adopting similar practices

RECOMMENDATION 50

The details of club Child Wellbeing and Protection Officers should be embedded throughout all relevant documents including 'public facing' literature.

Club handbooks should prominently include the names and contact details of designated CWPO's and their duties/deputising arrangements. These should be routinely updated.

RECOMMENDATION 51

Clubs must ensure that Child Wellbeing and Protection Officers and others charged with these or similar responsibilities are easily accessed. This should include ensuring that wellbeing and protection information is clearly and easily identified on websites and ensuring all 'front of house' staff can route calls and enquiries to the relevant person for prompt attention. All automated options menus on switchboards should include the Child Wellbeing and Protection Officer for the club with clear instructions and arrangements for messages to be left.

RECOMMENDATION 52

It is recognised that Child Wellbeing and Protection Officers in clubs carry considerable responsibility. This needs to be met with provision of the right training, support and development opportunities so this pivotal role is fully effective and engaged.

The Review further recommends that the Scottish FA with assistance from partner agencies develop a comprehensive but applicable Framework for making decisions in relation to initial assessment and discernment of reported concerns. This is to ensure that there is not simply a 'one size fits all' response and that concerns are dealt with proportionately based on what is known and what is discerned in the first instance. The handling of concerns is often delicate and should not be reduced to a 'painting by numbers' which is procedurally driven (often denoting 'back covering' rather than focussing on the protection of young people and the reduction of risk).

The Framework should be viewed as a tool and, like any tool, it is only effective and purposeful in the hands of those competent and confident to use it. The Framework then should be subject to refinement ongoing but underpinned by a training and development regime which continually improves the skill, knowledge and confidence to apply in practice.

RECOMMENDATION 53

Consideration should be given by the Scottish FA to appointing 'regional' wellbeing and protection development officer/s to deliver ongoing support, advice and to supplement capacity for clubs across grassroots and professional clubs.

The focus of this role should be on *development* and as a way of effectively responding on the ground to the needs of clubs for advice, support and resources to improve their delivery of child

wellbeing and protection and to make the right decisions to protect young people and reduce risk.

RECOMMENDATION 54

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

RECOMMENDATION 55

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

RECOMMENDATION 56

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

In a number of serious cases this has also permitted them to engage in hands-on, intimate activity with young players, often in private, without question or challenge.

There is an urgent need for a clear and consistent definition of *all* roles within football and checks and balances to be put in place to ensure roles are adhered to. The Review recommends that a full review of all roles in football is undertaken with a view to these being clearly defined and demarcated so that a clear system can be put in place which reduces the possibility for people to hold multiple functions without due consideration and overall accountability being held by the club itself.

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

RECOMMENDATION 57

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

However, when young players have or complain of sore or exhausted limbs or minor aches during training or play, the Review has concerns as to what type of treatment is administered, what the conditions and arrangements are for this and who is permitted to provide this.

The Scottish FA should scope and review this issue comprehensively with a view to developing and putting in place a full protocol governing these circumstances across Scottish football for under 18s. This review should also include scoping the use of sports therapists across Scottish football (as distinct from accredited and regulated physiotherapists). If sports therapists are noticeably in use the Scottish FA should convey the view of the Independent Review to the HCPC that sports therapists should be required to register and be subject to regulation (similar to physiotherapists).

RECOMMENDATION 58

The Scottish FA in partnership with Clubs should conduct a full review of the arrangements for young players (U18) visiting or coming to reside in Scotland for trials or to play. This is with a

view to ensuring consistency and compliance across Scottish Football including transport, chaperone, accommodation, support, integration etc

Where such players are to return to their country of origin, an exit strategy focused on their wellbeing and support should be put in place with the responsibility placed on the host club to implement this.

RECOMMENDATION 59

The Scottish FA in partnership with clubs should conduct a full review of recruitment, designation, training, and support of 'host families' for young players, ensuring consistency and compliance across Scottish Football.

RECOMMENDATION 60

The Scottish FA along with clubs should identify best practice for the recruitment, management and monitoring of football scouts to be agreed and implemented across Scottish football. This should be with a view to developing a standardised protocol governing the activities of scouts including a conduct and complaints/disciplinary procedure.

Football scouts should be subject to consistent accreditation and their identities published on club websites so that other clubs and parents can readily check their credentials. Similarly, they should always carry identification from their club which verifies and authorises their role.

RECOMMENDATION 61

The Review understands that it is common across clubs for scouts to be prohibited from having direct and unsupervised contact with young players. The Review recommends that this requirement is made standard across Scottish football and protocols devised and put in place accordingly.

RECOMMENDATION 62

It is recommended that a joint review should be conducted between the Scottish FA, the PFA and other relevant parties of the role of intermediaries in relation to young players with a view to agreeing and putting in place a system of regulation to satisfy proper safeguarding standards. Serious consideration should also be given to the appropriateness of intermediaries representing young players. The Review recommends that minimum requirements for football intermediaries operating in Scotland be introduced in any case. These should include a system of registration, PVG checks and a code of conduct.

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

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

RECOMMENDATION 63

The Scottish FA should conduct a review of arrangements and protocols concerning clubs use of local premises or leasing from other bodies such as Local Authorities; private or community facilities. This should determine security arrangements to protect young players as well as clarifying responsibilities and accountability for risks. This should be with a view to producing a simple framework for assessing risk prior to leasing or usage of non-club, third-party premises/facilities.

RECOMMENDATION 64

The Review recognises the improvements to the security arrangements of buildings and pavilions across Scottish Football. We also recognise the difficulties faced, particularly in

grassroots football, in monitoring and staffing all premises at all times in a way that guarantees proper ratios and supervision of spaces.

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

RECOMMENDATION 65

Wellbeing and protection responsibilities and actions concerning the protection of young people and the reduction of risk should be addressed in security contracting agreements and in pre-match briefings.

RECOMMENDATION 66

Wellbeing and protection policies/procedures should be accessible and presented in a way that is appealing and available in a variety of formats for immediate access and display. The Scottish FA and Clubs where possible should consider the use of apps and other platforms to host relevant information for users, staff and the general public.

RECOMMENDATION 67

Detailed attention should be given by the Scottish FA and clubs to website content to ensure that all wellbeing and protection information and material is prominent, clear, accessible and easily navigated.

This should also include a visual representation of accountability within club structures (such as a simple organogram).

RECOMMENDATION 68

There is a superfluity of material and documents on wellbeing and protection across Scottish football - this is often/sometimes confusing, duplicative and contradictory.

Individuals and Clubs therefore become confused about accountability and responsibilities.

The Scottish FA together with clubs should take measures to ensure that all policies, documentation, procedures and protocols are properly codified and simplified to ensure accessibility and ease of understanding and use across all organisations and clubs.

Extraneous and obsolete information, policy and guidance should be removed and one simple, straightforward suite of safeguarding information and policies provided. A continuous updating process should also be put in place.

RECOMMENDATION 69

The protocol for information sharing between the constituent parts of Scottish football and the Scottish FA requires further refinement and clarification so that it provides an effective, a accountable and proportionate way of dealing with wellbeing and protection matters and concerns. This must include provision of **secure and confidential** processes and systems for transmitting and storing information.

RECOMMENDATION 70

The Scottish FA should review arrangements for sharing of information between sports. This should be done in consultation with SportsScotland with a view to putting in place improved mechanisms which fully take account of the role of Disclosure Scotland and Listing/Barring processes.

RECOMMENDATION 71

It is recommended that the Scottish FA, its members and partners review all processes for the handling and management of complaints where these are about the way wellbeing and protection matters have been dealt with a view to ensuring that an effective, transparent and consistent complaints process is put in place within all clubs/organisations. This should also address how a complaint is to be progressed if it is related to anyone who might ordinarily be charged with the responsibility to deal with the complaint.

RECOMMENDATION 72

The Review recommends that the level of criteria for the wellbeing and protection of children and young people by clubs in relation to club licensing should be raised.

RECOMMENDATION 73

Licensing staff at the Scottish FA should be trained in wellbeing and protection proportionate to their needs as identified in the Wellbeing and Protection Training Pathway.

RECOMMENDATION 74

In the conduct of club licensing processes and examining club's compliance and 'fitness' to meet required standards licensing staff at the Scottish FA should engage and utilise the expertise of Scottish FA Wellbeing and Protection staff to assess /agree compliance of clubs for licensing purposes. Similarly, mutual support and advice should be provided in the conduct of safeguarding auditing functions.

RECOMMENDATION 75

The Licensing Committee should receive appropriate training and ongoing information on wellbeing and protection to ensure its decision-making is proportionate, informed and effective. Their training needs should also be identified and proportionately met through the Training and Development Pathway.

RECOMMENDATION 76

The Scottish FA should undertake (along with relevant parties) a full review of record retention policies and practices across Clubs/ANAs/SFA with a view to ensuring that this is commensurate with the needs and requirements of cases arising concerning alleged non-recent abuse and compliance with current legislation on data-protection and record retention. This should apply to all records including, but not exclusively, employee and volunteer records.

RECOMMENDATION 77

In improving processes and structures for the wellbeing and protection of children and young people and reducing risk the Scottish FA, clubs and organisations should pay due regard to the interface between safeguarding practice and delivery and the functions and responsibilities of Human Resources and to improving accessibility and communication between these two functions.

RECOMMENDATION 78

In 'non-recent' cases of alleged or suspected abuse, the role of HR directors in collating relevant information is critical - particularly past employment/volunteer records; financial and payroll records etc.

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

RECOMMENDATION 79

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

RECOMMENDATION 80

An agreed Ethical Framework for coaching activity with under 18s in Scottish football should be developed and put in place and this should form the basis for the coach Code of Conduct.

RECOMMENDATION 81

The Scottish FA with members and partners should review coach recruitment practices across all levels of Scottish football with a view to aligning these with wellbeing and protection processes across the board. In the conduct of such review, the Scottish FA should also take into account 'informal' identification and recruitment of coaches in order to develop a workable system for many grassroots clubs which should be more explicit, accountable and auditable.

RECOMMENDATION 82

Recruitment and appointment of coaches with young players should also include an 'assessment' of the values and attitudes of candidates in relation to children and young people and their diverse needs and based on the Ethical Framework.

RECOMMENDATION 83

Coaching development programmes in Scottish football should be amended to ensure a focus on the needs, abilities, inclusion, potential, skill, knowledge, rights, and protection of children and young people participating in the game at every level.

The training and development framework for coaches therefore should equip coaches to respond *holistically* to individual children and young people as well as groups and to ensure that they are effective in communicating with children and young people.

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

RECOMMENDATION 84

Coach education and assessment should also assess how coaches/trainee coaches interact and communicate as part of periodic or ongoing accreditation.

RECOMMENDATION 85

Those with responsibility for coach education should explore the best ways of helping coaches communicate effectively with young players therefore improving their capacity to protect and safeguard them as well as develop them as individuals and as players.

Consideration should be given to promoting and extending the use of body-worn camera equipment *as a professional development tool* for coaches with under-18s to monitor and improve their interactions with young players. The use of such technology should be subject to strict protocols and overview.

RECOMMENDATION 86

The Scottish FA should conduct a full review of independent/freelance football coaching activity in Scotland with a view to developing a regime for proportionate regulation and monitoring including codes of conduct, compliance, coaching standards and PVG checks.

RECOMMENDATION 87

Wellbeing and protection principles and practice should be a central and prominent aspect of club football academies and the academy structure in Scottish Football. The Review recommends that the level of criteria for wellbeing and protection by club academies in relation to the awarding of performance/elite academy status should be raised.

RECOMMENDATION 88

CAS staff charged with the responsibility to conduct audits of academies or clubs applying for performance/elite academy status should receive proportionate training in safeguarding young people and reducing risk. Their training and development needs should be agreed in accord with the Training and Development Pathway.

RECOMMENDATION 89

It is recommended that, in the conduct of considering and awarding club academy status, Club Academy Scotland will engage and utilise the expertise of Scottish FA wellbeing and protection staff to assess /agree compliance of clubs.

RECOMMENDATION 90

All Football Academies should consider establishing a Young People Council or any equivalent mechanism to facilitate the participation of young people across club and academy delivery (not just wellbeing and protection issues) including peer support, mentoring, consultation, and any policy matter affecting them etc.

RECOMMENDATION 91

The Scottish FA and its constituents should undertake further and regular participation exercises with young players in partnership with the Scottish Children's Parliament and others so that their views and perspectives are embedded into all plans and measures to improve the safety and wellbeing of young footballers ongoing.

RECOMMENDATION 92

The role and influence of bystanders in both identifying and preventing sexual abuse is significant and this has been borne out in the personal accounts provided to the Review. Bystanders include both peers and adults including parents.

The Review recommends that the Scottish FA this adopts a bystander approach and integrates this into all awareness strategies and campaigns, training programmes, policies and procedures.

In doing so the Scottish FA should draw on knowledge and experience from other areas where this has been applied including the work of White Ribbon Scotland and Mentors in Violence Prevention/VRU etc.

RECOMMENDATION 93

The Scottish FA should immediately review the arrangements in place for enabling access to services by people affected by sexual abuse in football with a view to developing a process for receiving and managing future allegations of non-recent sexual abuse in football centred on the needs of the individual as well as the proper processing of information and assessment of risk. This should include the right approach to confidentiality and the capacity to enable individuals to access the right services and exercise choice in doing so.

RECOMMENDATION 94

The Scottish FA should commission and retain a professional service to undertake assessment of the needs of those coming forward in future and thereafter, as required, to provide ongoing support and mental health programmes of help/care if these are appropriate and desired. The cost should be included in the reconsideration of investment and funding of safeguarding in football.

Indeed, this arrangement should extend beyond people affected by sexual abuse in football to anyone involved in the game who experiences difficulties with mental health.

Where appropriate, this should be addressed and developed with relevant partners within and/or external to football such as the PFA and others.

RECOMMENDATION 95

The Review recommends that the Scottish FA and clubs and organisations in Scottish football consider the establishment of a permanent testimonial to the experiences of and impact on those affected including consideration of the creation of a fund which might underwrite support and assistance for those who have been personally affected by sexual abuse in Scottish football and indeed those in Scottish football who are experiencing other mental health challenges and issues.

The Review sees no reason why this might not also be contributed to or underwritten by commercial donation and sponsorship.

RECOMMENDATION 96

Clear and simple information and material on child sexual abuse prevention should be visible and included on the Scottish FA and club websites and in policies - this should include information on signs in adult behaviour that may indicate concern and how to respond to this (as well as sources of help to change/make safe adult thinking and behaviour).

RECOMMENDATION 97

The Scottish FA should give serious consideration, in partnership with the PFA and others, to identifying and appointing a prominent figure in Scottish football to act as a 'champion' for issues concerning the protection of young people; the needs of people affected by abuse and trauma; and wider mental health issues including education; awareness-raising; public engagement and promoting key messages.

Appendix 2 – TERMS OF REFERENCE OF THE INDEPENDENT REVIEW OF SEXUAL ABUSE IN SCOTTISH FOOTBALL

Background

During November and December 2016 a number of reports appeared in the media in relation to allegations of non-recent child abuse involving a former referee, former coaches, team staff and others involved in football in Scotland during the 1970's, 1980's and 1990's. As at the publication of these terms of reference the exact number of players, alleged abusers and clubs is currently unknown.

Against this background the Scottish FA Board have determined that it is necessary to instruct an independent review into what if anything the Scottish FA and/or any of its members and/or affiliated and/or associated organisations knew in relation to these matters at the relevant time and what action did and should/could have taken place at that time.

The Independent Review (the "Review") has been set up:

- To consider whether or not and to what extent the Scottish FA was aware of the matters highlighted and now brought to its attention;
- To consider what steps were taken by the Scottish FA during the relevant periods in relation to the protection of children brought to its attention at that time and; to identify any failings or deficiencies on the part of the Scottish FA in that regard;
- To consider what steps were taken by its members and/or affiliated and/or associated organisations, either at the time of them being made aware or subsequently, and identified as relevant to the alleged incident(s) and to those concerned. This will include responses, decisions and actions either taken or omitted; and,
- To consider what lessons have been learned by the Scottish FA and its members and/or affiliated and/or associated organisations since those incidents took place and following any investigations that have taken place to ensure that the risk of abuse is reduced and where possible eliminated.

In light of the above consideration the Review will make recommendations as appropriate to ensure that any failures or deficiencies identified have now been or will be addressed in an appropriate manner.

Remit/Procedure

The Scottish FA will provide the Review with all information and materials in its possession that are sought by it. Where information sought is not in the possession of the Scottish FA, the Board shall grant delegated authority to the Review to act on behalf of the Scottish FA in accordance with the terms of Article 86. The primary objective of this Review is to ensure that any failings now or in the past of the Scottish FA and/or its members and/or affiliated and/or associated organisations are brought to light so that appropriate steps are put in place to ensure that any identified failings and deficiencies cannot be repeated.

The Review's remit will be to focus on "sexual abuse" as defined by the Scottish Government.

The Review is cognisant of ongoing investigations relevant to the matters that it seeks to review. To this end, it will work with all other relevant inquiries to ensure that, where legally possible, all relevant information is shared whilst ensuring that all criminal investigations are given primacy as appropriate. Any and all allegations of child abuse referred to the Review shall be referred to the Police in the first instance.

The Review will:

- only cover areas where the Scottish FA has jurisdiction but, where information comes to light that is not within its jurisdiction this will, where legally permissible, be passed to relevant authorities whether that be the police or other regulatory authorities (sporting or otherwise) in the jurisdiction(s) concerned;
- not determine the nature of any liability on the part of any individual or organisation whether that be criminal, civil or regulatory;
- where potential breaches of football rules and regulations are highlighted refer these to the Scottish FA to consider what if any action can and/or should be taken; and,
- be conducted in as transparent a manner as possible in particular having regard to duties of confidentiality, security and data protection.

It is the intention of the Scottish FA that, where legally possible, any report and findings of the Independent Review be published. However, it will be for the Review to consider what can be published and when and, in this regard, will liaise with the Scottish FA and other appropriate authorities, bodies and enforcement agencies in relation to what can be published.

Composition of the Review

The Review will be led by Martin Henry, with secretariat and appropriate external reviewers as required/ appointed. Martin Henry will chair the review team and has contributed to these terms of reference alongside recommendations and considerations from survivors of non-recent sexual abuse in Scottish football.

Any amendment to these terms of reference will be agreed between the Scottish FA and the Review team and any such amended terms of reference shall be published.

The Review's report, findings and recommendations will be theirs alone.

Timetable

The findings of the Review will be reported to the Scottish FA Board once complete. No final date can be given at this stage given the ongoing nature of matters arising, the passage of time and the time it may take to recall relevant information, materials and to locate all relevant people to interview acknowledging that said individuals may no longer be domiciled within Scotland.

Acknowledgements

Thank you to children and staff from:
Aberdeen Football Club + Heart of Midlothian Football Club

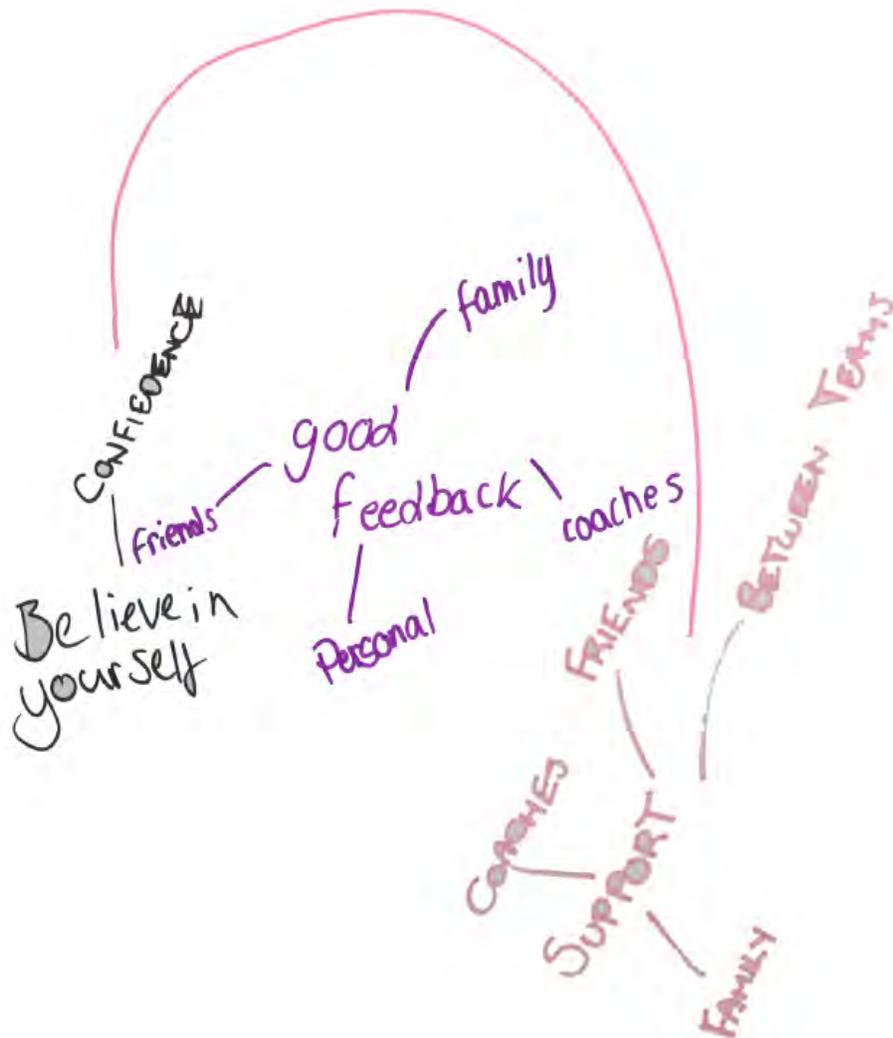
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About this consultation

Children's Parliament is interested in how we can help children get involved with sport and be active. This quote from a child involved in one of our projects sums up just how important it is: *"Playing sports is like having a common language. You speak with your feet and your body. Sport can bring people together."*

Children's Parliament supported the Scottish Football Association (SFA) to write its booklet called 'Child Wellbeing and Protection in Scottish Football'. This document is now the template for Child Protection and Wellbeing Policies and Procedures in football clubs across Scotland. It establishes the importance of the child's right to be safe when participating in football, and that we adults share a duty to ensure they have a positive experience of participation in the sport.

So that everyone in Scottish Football has a better understanding of the views of young footballers (aged 10 to 14) on what it means to be happy and safe when they take part in football related activities, Children's Parliament was asked by the SFA and the Independent Review of Sexual Abuse in Scottish Football to facilitate 2 workshop sessions with children. At the workshops, 31 boys and 3 girls took part in activities that helped them understand their rights and share their opinions about being involved in the game. The children talked about what helps motivate them, makes it fun and helps them feel successful and safe. They also discussed what they would like to change.

When children get involved with Children's Parliament we want them to have fun and to learn that their experiences, opinions and their rights are important. All views are welcome, and this report strives to represent what was discussed in the workshops we facilitated.

This report is for the Scottish Football Association and the Independent Review of Sexual Abuse in Scottish Football. It will help to ensure that the voices of children playing football today are represented in the Independent Review's report and recommendations. The report has been shared with our host clubs. A summary poster/report has also been produced for the participating children.

The workshops were hosted by Aberdeen Football Club and Heart of Midlothian Football Club. Children's Parliament would like to thank staff, parents and carers, and young players at both clubs for the warm welcome and enthusiastic participation.

The quotes in this report come directly from the children.

Key Messages

The purpose of this exercise, and the report, is to bring the voice of the child to consideration of how we make real our commitment to the wellbeing of children involved in Scottish Football.

The children who participated in the workshops were open and honest and trusting of the process. They showed a level of emotional literacy and insight that, as Children's Parliament facilitators, we found impressive. Because they were honest the children have identified what works to support them in football, and what does not. It is important that adults see this honesty as helpful, not as criticism. As adults, we can always learn from the children we love and care for, and so we hope that adults read this report openly and see the balance children give to what works well and what could be even better.

As facilitators of the process, Children's Parliament identifies these key messages:

The children we met love their football. They are immensely proud of their achievements and appreciative of the opportunities being provided by their Club. They are grateful to all the adults who support them – their parents, carers and grandparents, the volunteers who support children to play the sport, and the professional staff in the Club.

The children identify strongly with their Club. The young players we met are 10 to 14 years old and they are clear that day-in, day-out, in all environments, as one child put it: **"You always represent"**. This attitude displays a commitment, a sense of belonging and a discipline that will have many positives for a child.

While some of the young players we met will think of themselves as a young person it is important for us to remember that these 10 to 14 years old are children. The distinction matters because despite the evident maturity and confidence of the young players we must remember that it is our responsibility as adults to help children of this age to develop skills to build healthy social relationships and a positive view of themselves. Children of this age need to know they are loved and protected. They need to know that whatever environment they are in, they will be supported and safe. This is how we help create a healthy, happy adolescent.

The engagement with the children evidences and emphasises that it's all about relationships. Children's Parliament proposes that the focus in society should be on forming rights-based relationships. These are relationships based on the idea of human dignity and characterised by empathy, kindness and trust. It has been interesting to hear the children talk with us explicitly about kindness and trust – and allude to empathy (or a lack of empathy) in some experiences. Everything we know about wellbeing and child protection tells us that relationships based on kindness and trust are enhancing and empowering – children will do better – and harmful adult behaviour undermines these very things. Sometimes children capture things beautifully, one young player told us this:

"If someone makes you happy and says good things and are positive you can use the happiness to praise someone else".

In this work the children have described what adults do that makes football enjoyable and encourages them to do their best. They have talked about the characteristics of an adult to whom they would go if they had a question or a worry - adults need to be kind, understanding and available. It is working towards these things that will enhance wellbeing and protect children.

Children have talked with us in equal measures about the importance of encouragement and the consequences of pressure. They are perhaps two sides of a coin, and adults – in football and at home - need to reflect on whether their behaviours reflect one side or the other. The children are keen to work hard, and they are ambitious for themselves and for their team. But the pressures are also obvious – both external and internal when the child does not want to let people down. The 'prize' of a professional contract looms large for these children, and when it seems it might be out of reach or taken away they can be worried, anxious and unhappy. With a strong sense of how much hard work they put in to their football it is with a sense of real poignancy that one child said: "Hopefully it's just all worth it".

The adults around the child make decisions about the child's football career at this young age. Children are very aware of this and they want adults to know they are committed. The children express concerns that a bad game, a bad patch, injury can all jeopardise their dreams. When adults hold such power, and it is important to name it as such, it is beholden upon them to exercise that with care and respect for the child's greater wellbeing.



1. What does a young footballer need to be healthy, happy and safe?

After introductions and explanations about confidentiality, child protection and the purpose of the session, the children were introduced to the first part of the workshop. Children worked in groups and were asked to consider: What does a young footballer my age need to be healthy, happy and safe?

What does a young footballer need to be healthy?

The children are very aware of the need for good physical fitness, and the importance of good diet. They understand the negative impact of alcohol, drug use and not having enough rest or sleep. Emotional and mental wellbeing were mentioned in this initial discussion, but raised in more detail when discussing being happy and safe. From the start of the discussion, Children's Parliament facilitators were very struck by the discipline, commitment and sense of responsibility each child has toward their health and fitness as underpinning their successful participation in football. There is a recurring theme which starts in these discussions about what a young player must give up or avoid, some of which might be regular behaviour for a child of their age. One player put it like this:

"You make sacrifices – things like bedtimes, staying out of trouble, walking away from things, not going out with mates."

Being healthy means:

Making sacrifices **Playing other sports**

Resting

Listen to your body

Girlfriends/boyfriends **Exercise**

No drugs

Go to the gym

Sleep

Getting a good education

No technology before bed **Having a routine**

Enough time

Mental health too

A good diet and staying hydrated

What does a young footballer need to be happy?

Happiness for the young footballer is connected to getting a game and playing well. The children recognise the importance of enjoying the game, of being passionate about their participation, as one young player said: *“The main thing about football is to enjoy it because if you don’t have the passion then there’s no point”*. The children describe a sense of personal responsibility to maintain confidence, *“keeping your chin up”*, effort and motivation to succeed – being successful in their football will bring the ultimate goal of long term involvement and a professional contract.

Children also identify things other than football – family, friends, doing well at school all contribute to personal happiness and a sense of wellbeing, although the time demands of football can put pressure on these: *“More time would make me happier, more time to do other stuff”*. Positive feedback and support from others also contributes to a strong sense of self. On the other hand, the children feel the pressure to succeed, and can worry: *“If you overthink stuff it gets you down”*.

Being happy means:



What does a young footballer need to be safe?

A sense of personal responsibility is also expressed when talking about what a young player needs to be safe. Again, the children recognised they need to make “the correct decisions to keep yourself safe”. Relationships with adults also play more of a part in the discussion of being safe. Adults within the game, particularly coaches, are identified as helping to keep the child safe. Peer relationships also matter, expressed as the need for “good connections with your whole team”. The children also recognise the importance of “having someone to talk to about issues or problems” and “someone to be with you”.

Being safe means:

The word cloud features the following terms and phrases:

- Family
- Making the correct decisions to keep yourself safe
- Shin pads
- Appropriate clothing
- Being safe online
- Coaches teach you things and keep you safe
- Respect for staff
- Referees – respect for them, respect for you
- Staying out of trouble
- Playing by the rules
- Physio and psychologist
- Opponents being respectful
- Someone to be with you
- Knowing your limits – but also pushing yourself
- Good connections with your whole team
- Good relationship with coach
- When you're angry, take a breath
- Having someone to talk to about issues or problems
- Bit Good Pitches!

2. What do adults say/do that helps us as young footballers?

Children were asked to consider what adults do to help them as a young footballer to be healthy, happy, safe and enjoy their football. The adults we wanted them to consider were not their parents or carers, but rather other adults who help. We thought, as a group, who these adults might be - children identified coaches, scouts, teachers, physiotherapists, psychologists, older/young players. The children worked in groups, with a large figure they could write and draw on. As they reflected on what it is an adult can say or do that helps, they considered how this makes them feel.

The most positive things an adult can say to a child relate to praise and encouragement. This is relayed in their **"positive tone of voice and language"** – so they give you feedback, advice, **"constructive criticism"** and compliment you, tell you **"well done"**. When things do not go well the children want to hear an adult say:

**"Don't worry.
Don't give up.
Keep going!"**

The young players identify 'team talk' as important, a time when the whole team can feel good and be praised. Children also appreciate when an adult involved in their football takes the time to speak to them individually, they love to hear an adult say: **"There's a reason you are in this team... because you're good"**. This individual attention should be fair and shared:

"Make sure everyone gets one-to-one time, so no-one is getting more attention."

When it comes to what adults in football do for the player, this is focused on the positive relationships that the children seek. The adult **"helps you"**, they do practical things like support the players to get to a match and to training, they give advice on health, food and fitness, they decide to play you in a match. These adults **"look after you and keep you safe"**. They also take time to **"review your performance"** and improve skills through training, this might be **"3 times a week"** or **"private training"**.

These words and actions have an impact on how children feel about themselves and the sport. An adult can support the child to build their confidence and a positive sense of self; because this adult is supporting you it **"makes you feel calm"**, **"feel trusted"**, **"you appreciate yourself more"**, **"you feel motivated"**, **"you feel pleased and proud"**, **"you feel worth something"**.

Children are appreciative of the time that adults give to support their football. They understand that they **"give up their time"**, that they **"have faith in us"** and so the children have **"respect for their opinion"**.

3. What is it that adults say/do that does not help us as young footballers?

Having considered what adults say or do that helps a young footballer to be healthy, happy, safe and enjoy their football, the children then considered what an adult can say or do that does not help, and how this can make them feel. The children continued to work in their small groups.

For the young player, the most worrisome things an adult can say to a child relate to the child's efforts or skill in the game. When this happens, an adult might tell you "You're not working hard enough", or "talk negatively about a play in front of the whole team", shout or swear at you, tell you "You shouldn't be at pro-youth anymore. You're not even boys club standard. You're rubbish". For the young players, harsh words and a lack of empathy are confusing and hurtful.

"When coaches shout, it doesn't feel good inside. It drops your confidence".

"The other day a referee called me a bad word - I don't know why".

"They kind of harden you, when you hurt yourself, like

"In training or a game and you get hurt and you are crying and they say "stop crying" that doesn't help and it makes you more upset and then you start playing worse".

'Oh, just get up".

"A coach went round the whole team and told us if you were a 'winner' or 'not a winner', in front of everyone".

When it comes to what adults in football do for the player, this can also be experienced as negative for the child. Some children have concerns about favouritism so that an adult might "treat some players better than others" or "focus on one player". On the other hand, a child might worry that they or another child is singled out for unfair treatment.

"All the coaches have favourites. Like a favourite doesn't get the blame for anything, the team would".

The young players talked about a particular problem with the parents of an opposing team: "Other people's parents encourage them to be aggressive"; "Other adults, like parents or coaches of opposition teams can be intimidating and scary".

For young players attending High School with an Academy or SFA programme there were worries that some "teachers withdraw football as a punishment"; "Teachers just try to scare you by saying you might not get to play if you don't do well in class, blame you for things, say you've done something". The young players felt that oftentimes:

"Teachers don't understand about our commitments and problems getting homework done"

These words and actions have an impact on how children feel about themselves and the sport. When they feel targeted by unkind words or actions it leaves children feeling "worthless"; "like there's no point"; "jealous of other players"; "separated or isolated"; "less important". The children recognised that it is difficult as a child to address or respond to an adult:

"Sometimes you don't know what to say to a coach, especially if you don't know them. It's hard to say things or answer questions"



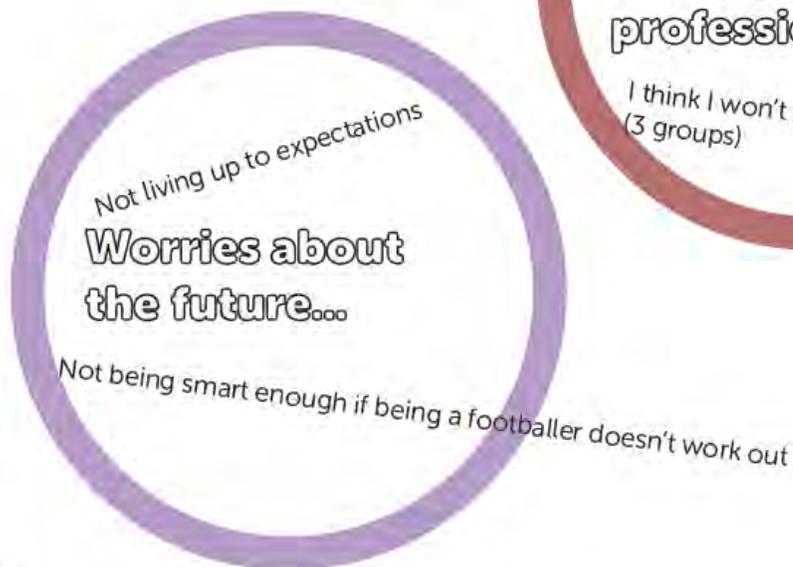
4. What questions or worries can a young footballer have?

The children were asked to consider what questions or worries a young footballer their age can have. They were encouraged to think about questions or worries they might have, and also those questions or worries they heard from team mates.

The questions articulated by the children relate to three themes: immediate concerns about being played and doing well, a longer-term issue as to whether they will make it as a professional footballer, and questions about whether professional football is the best thing for them.



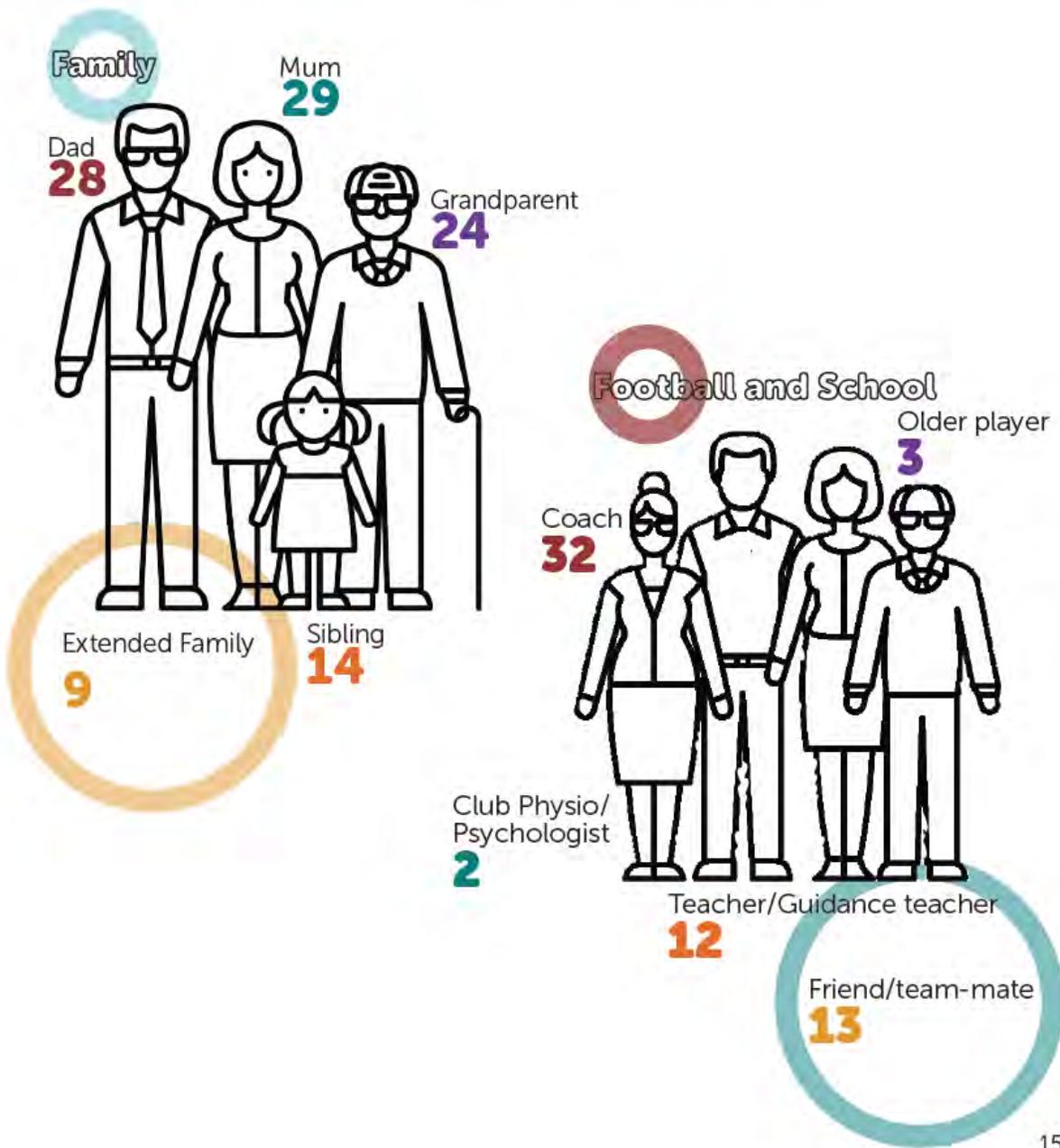
When asked to reflect on what worries a young player might have these reflected the questions. Across the two workshop sessions the children worked in 14 small groups (of 2 or 3 players). The worries raised by more than one group are indicated.



5. Who can I go to with a question or a worry?

Working individually, the children were asked to identify 5 adults they could go to if they have a question or a worry. This could be any adult - a family member or an adult involved in football, or at school. The children then identified the characteristics of these adults: thinking about the question: What is it about them that means I would go to them with my question or worry? To help with this part of the workshop the children used a drawing of their hand, using the 5 fingers to think of an adult, and the palm to record characteristics.

All 34 children identified people they could go to. The graphics below separate family members and others who the child will know through football or school, and the numbers relate to how many children said they would approach that person with a question or worry.



All children named a family member. As the graphic shows, the most named person is a Coach. Twenty-six of the children gave some description of the characteristics of the person they would choose to go to. This selection captures these insights:

"They will try to help me and will listen. I also have a good relationship with them all and all are understanding and supportive. My coach because he plays in my position, my other coach because he's a good understanding coach. My uncle because I am close to him. My mum is close to me. My other coach is understanding."

"Some of them played football when they were younger. They are kind and encourage me."

"Supportive, able to talk to. Kind, encouraging and they listen. All of them, I make a good relationship with them."

"Trust, able to talk to, confident around them."

"They know who I am. Known for a long time. Respect. Encourage me. Know I'm trying. Supportive, listening. Jokey. Understanding."

"I think having a good relationship with your coach keeps you safe- like if you have stuff going on at home you need someone to talk to about it."

"I can trust these people, they are kind, they make me feel welcome."

"Kind, respectful, happy. Supportive, good relationship. Encourage."

"Comfortable around them and trust them with your thoughts."

6. Dear adults...

To end, the children worked individually to write a message to the adults in their lives – family members and other supporting adults. The prompt read: Dear adults, if you want me to be the best footballer I can be then you need to....

It was explained that although this letter was not to be signed, that it would not be delivered directly to the adults in their lives, we would read all the letters and learn things from them for the report, so that adults could understand as much as possible about every child's needs.

The letters from the children give insight as to what they need and want from the adults around them. A small number have been selected here to represent these views.

"Encourage and support me, be easy to talk to and kind. I need you to be helpful to me. Believe in me. Help me if necessary. Trust me. Encourage me. Improve me."

"Be kind, helpful and a nice person to listen to. I think some parents need to remember that it's just a game, but some parents take it way too seriously. Sometimes parents even shout at their children if they play bad. That was just a little message for all the adults out there."

"Be respectful and appreciate that I am doing my best and want to be the best. I would like you to be there for me and support me through the bad. I can only make it with your support and appreciation of my life and feelings. I need you to be the best supporter and helper possible. I would also like you to help me not just on the football side, also my school and social life. I need you to help me with my homework and my school work, so if I'm struggling I know you'll be there. I also need you to help me make the right decisions about my friends and internet safety."

"Help me. Realise I have the same rights as all of you. And I am always trying my best."

"Be more supportive. Ask how my day has been. Make homemade healthy meals and continue to give me lifts to training and school. Help me with homework, continue to have access to our tutor. Continue to encourage me to be the best I can be."

"Encourage me. You need to be easy to talk to. Don't pressure me too much, but do pressure me a bit."

"Give me advice and be supportive. Help me improve and get better. Be proud of what I achieve and help me have a good diet. Treat me the same as you would a boy."

"Motivate me and listen to me when I have a worry. Encourage and support me. Take me seriously. Make sure I am happy, healthy and safe. Give me your full attention when I am discussing with you."

"Stop pushing me to go out for runs as I want to do it for myself. Stop making comments on my body and telling me what shape I need to be. I'm happy the way I am and if I want to be fitter then I will do it myself! But keep on encouraging me to be my best."

"Trust that I have the potential of being a professional football player. There will be times when I don't enjoy it, but you need to encourage me whatever my decision is. You need to remember that if I enjoy this, it's not your decision it's mine. I hope you are proud of me."



About Children's Parliament

"There would be no human dignity without empathy, trust and kindness in the world".
- Member of the Children's Parliament

Children's Parliament is Scotland's centre of excellence for children's participation and engagement. Our interest is in working with children, the adults who love and care for them, and the wider communities in which they live, to support our country to meet its obligations to our youngest citizens. We emphasise addressing the needs and rights of children as distinct from young people or adults, but remind every individual citizen and public body that children's rights are human rights.

In 2017, Children's Parliament was 21 years old. To celebrate our birthday, we reviewed our work and published 'What Kind of Scotland?', a reflective and celebratory report. Available here: <https://www.childrensparliament.org.uk/what-kind-of-scotland/>

Image: Children share their work and ideas with their peers.





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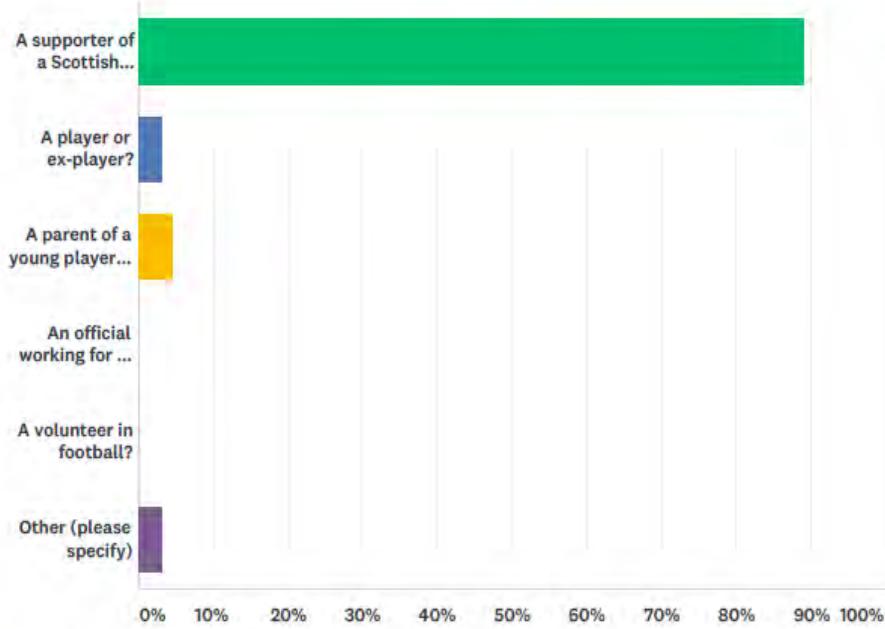


Appendix 4 - REPORT OF THE CONSULTATION WITH FOOTBALL SUPPORTERS (SUPPORTERS DIRECT SCOTLAND

Independent Review Team's Supporters Survey

Q1 Are you

Answered: 64 Skipped: 1

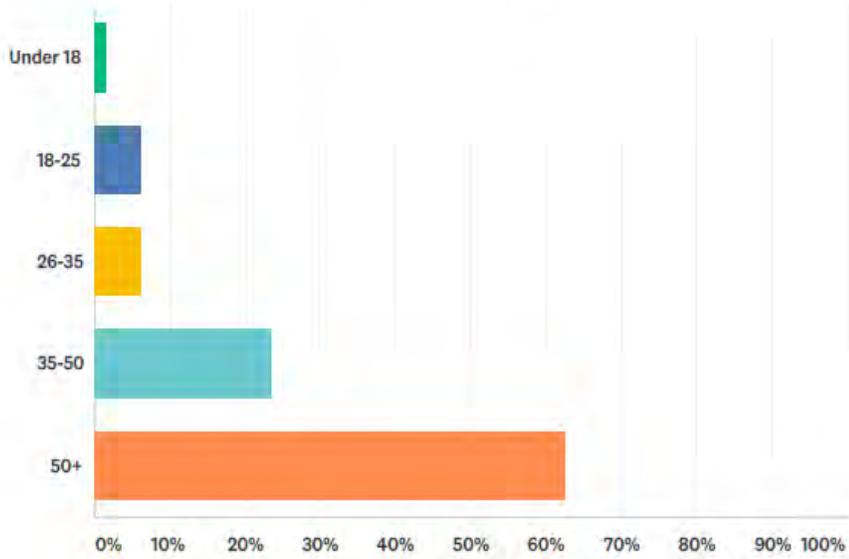


ANSWER CHOICES	RESPONSES	
A supporter of a Scottish Football Club?	89.06%	57
A player or ex-player?	3.13%	2
A parent of a young player currently playing?	4.69%	3
An official working for a club?	0.00%	0
A volunteer in football?	0.00%	0
Other (please specify)	3.13%	2
TOTAL		64

Independent Review Team's Supporters Survey

Q2 What age do you fit into?

Answered: 64 Skipped: 1

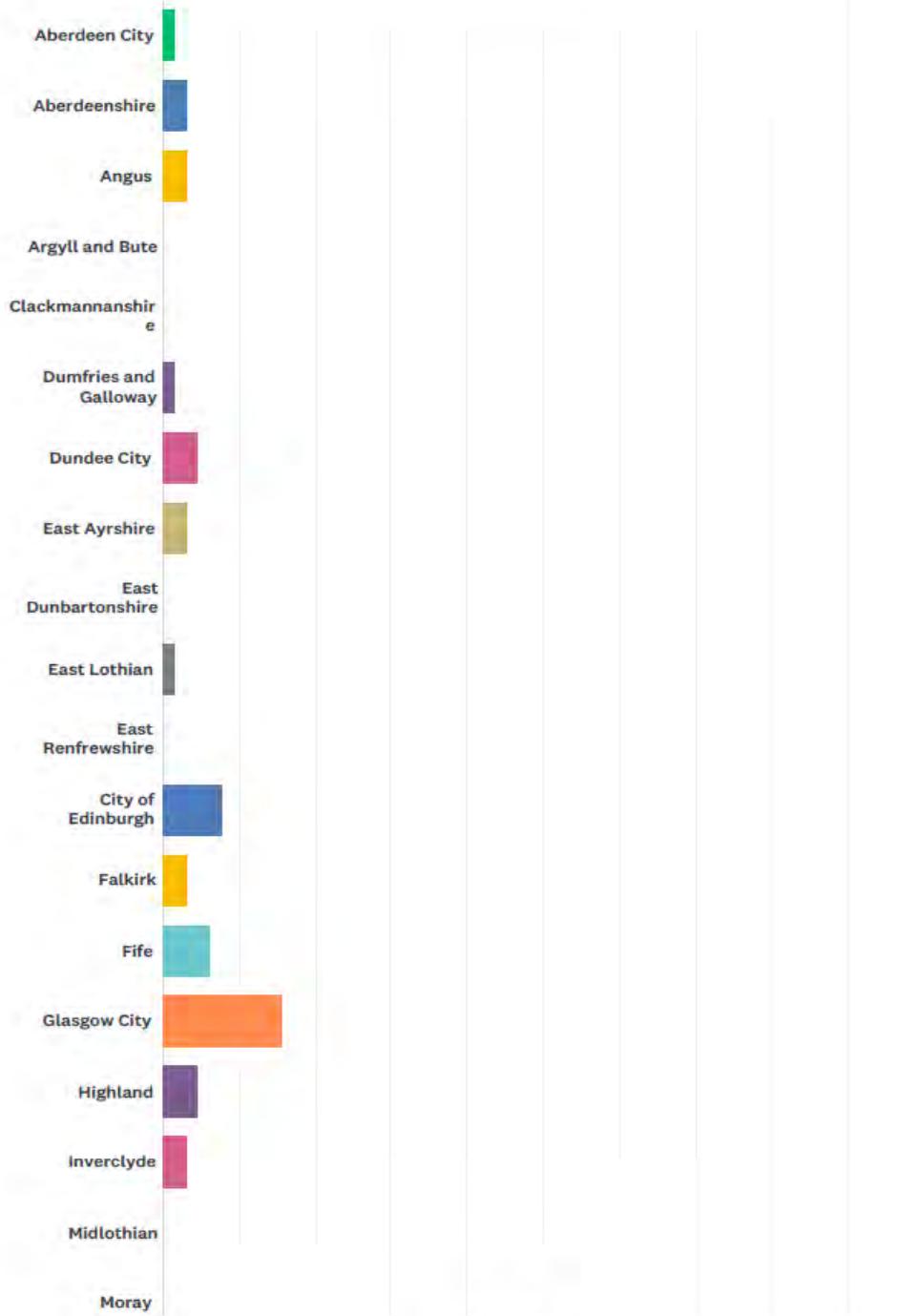


ANSWER CHOICES	RESPONSES	
Under 18	1.56%	1
18-25	6.25%	4
26-35	6.25%	4
35-50	23.44%	15
50+	62.50%	40
TOTAL		64

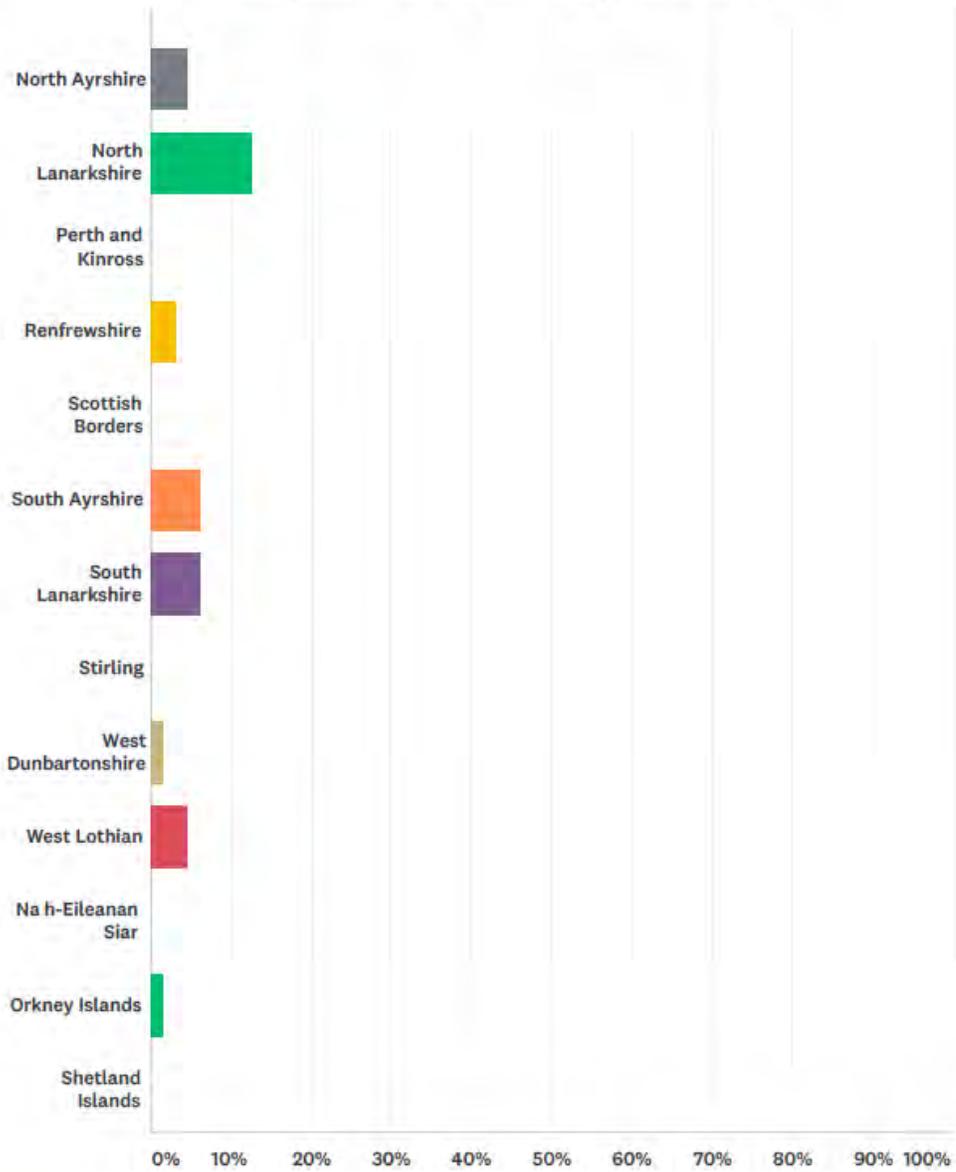
Independent Review Team's Supporters Survey

Q3 Which region do you live in?

Answered: 64 Skipped: 1



Independent Review Team's Supporters Survey



ANSWER CHOICES	RESPONSES	
Aberdeen City	1.56%	1
Aberdeenshire	3.13%	2
Angus	3.13%	2
Argyll and Bute	0.00%	0
Clackmannanshire	0.00%	0
Dumfries and Galloway	1.56%	1
Dundee City	4.69%	3
East Ayrshire	3.13%	2
East Dunbartonshire	0.00%	0

Independent Review into Sexual Abuse in Scottish Football

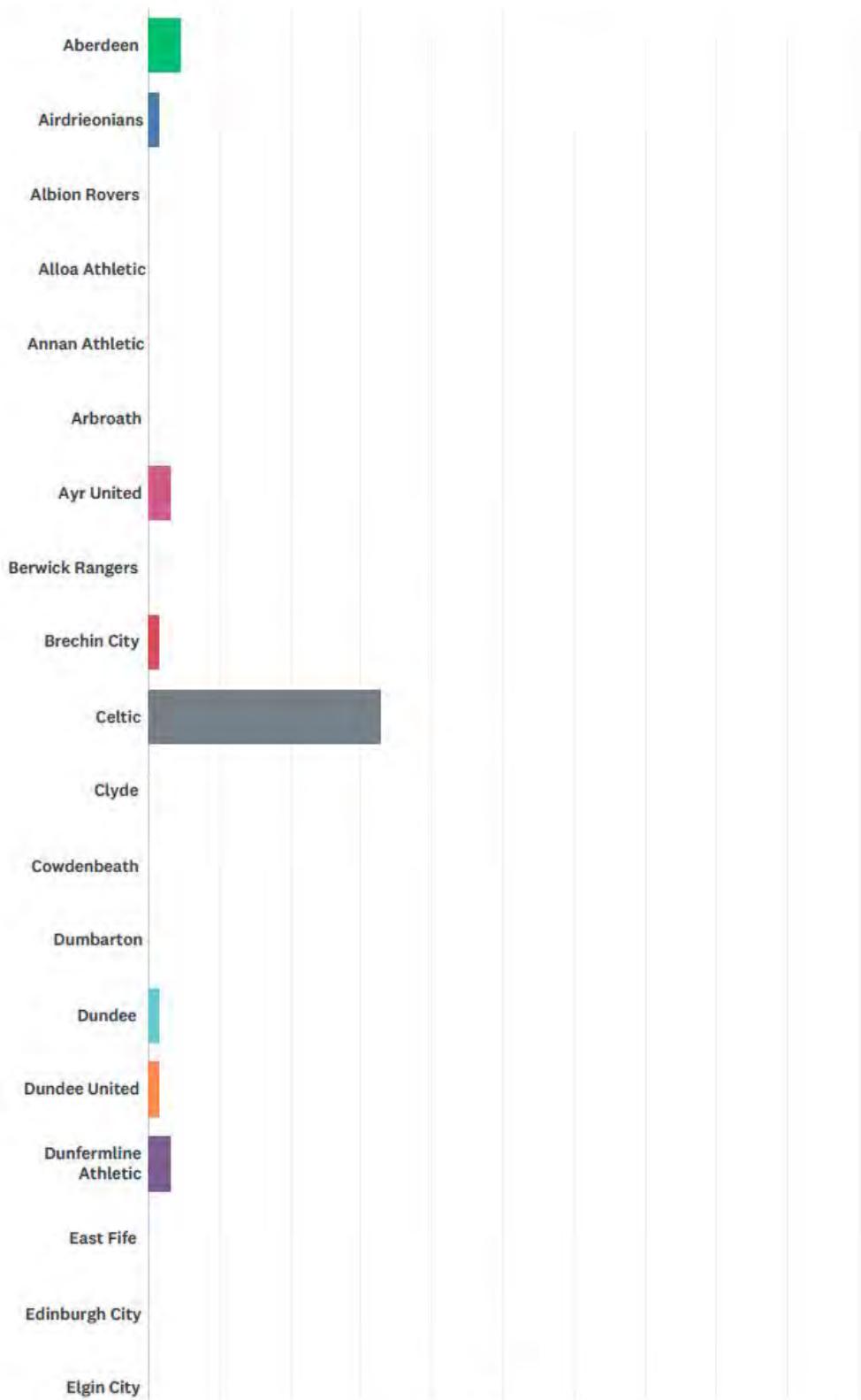
Independent Review Team's Supporters Survey

East Lothian	1.56%	1
East Renfrewshire	0.00%	0
City of Edinburgh	7.81%	5
Falkirk	3.13%	2
Fife	6.25%	4
Glasgow City	15.63%	10
Highland	4.69%	3
Inverclyde	3.13%	2
Midlothian	0.00%	0
Moray	0.00%	0
North Ayrshire	4.69%	3
North Lanarkshire	12.50%	8
Perth and Kinross	0.00%	0
Renfrewshire	3.13%	2
Scottish Borders	0.00%	0
South Ayrshire	6.25%	4
South Lanarkshire	6.25%	4
Stirling	0.00%	0
West Dunbartonshire	1.56%	1
West Lothian	4.69%	3
Na h-Eileanan Siar	0.00%	0
Orkney Islands	1.56%	1
Shetland Islands	0.00%	0
TOTAL		64

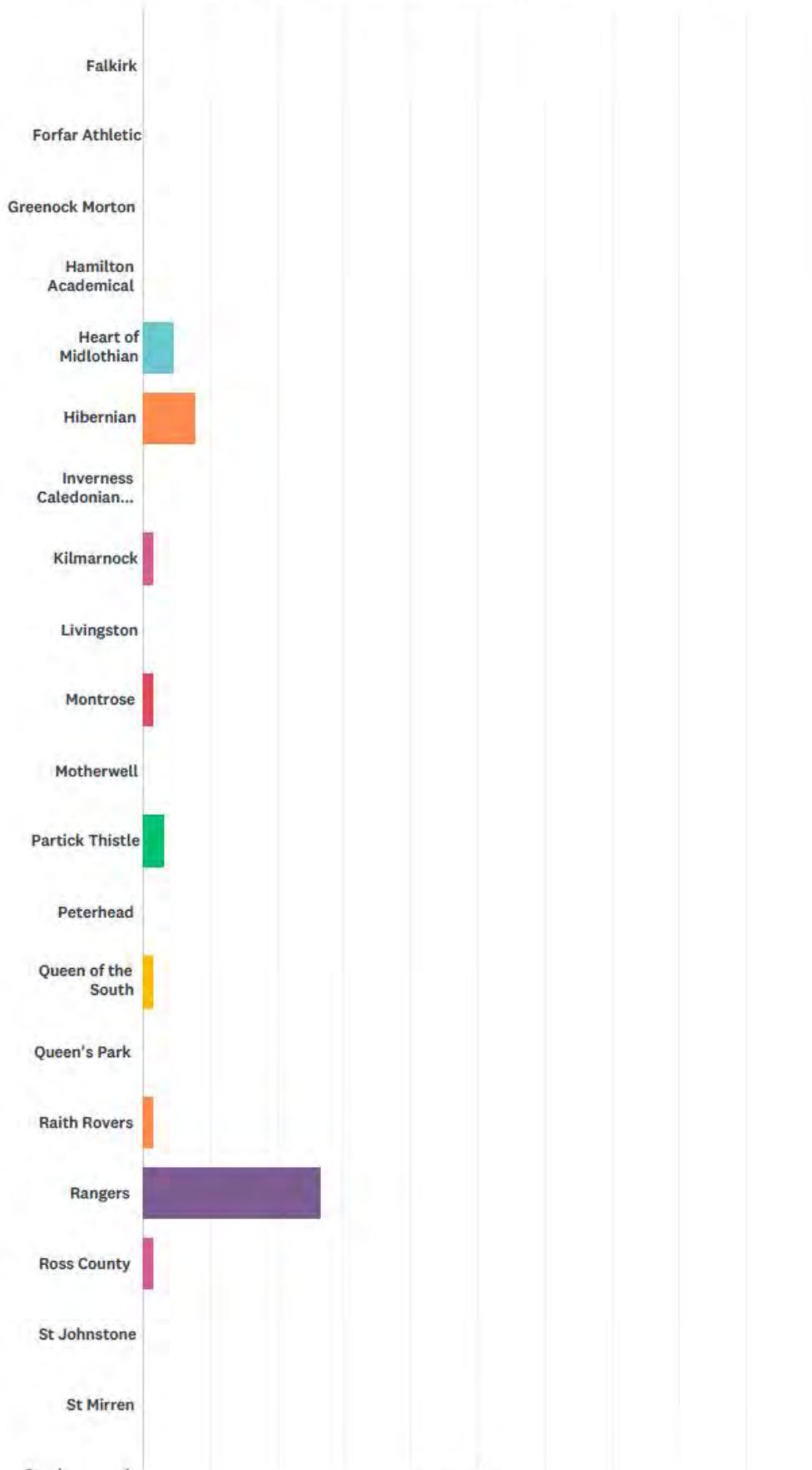
Independent Review Team's Supporters Survey

Q4 What club do you support?

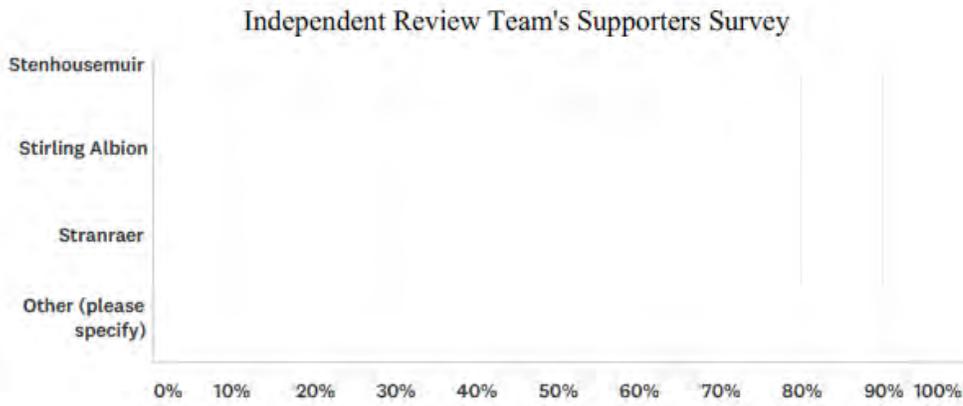
Answered: 64 Skipped: 1



Independent Review Team's Supporters Survey



Independent Review into Sexual Abuse in Scottish Football



ANSWER CHOICES	RESPONSES	
Aberdeen	4.69%	3
Airdrieonians	1.56%	1
Albion Rovers	0.00%	0
Alloa Athletic	0.00%	0
Annan Athletic	0.00%	0
Arbroath	0.00%	0
Ayr United	3.13%	2
Berwick Rangers	0.00%	0
Brechin City	1.56%	1
Celtic	32.81%	21
Clyde	0.00%	0
Cowdenbeath	0.00%	0
Dumbarton	0.00%	0
Dundee	1.56%	1
Dundee United	1.56%	1
Dunfermline Athletic	3.13%	2
East Fife	0.00%	0
Edinburgh City	0.00%	0
Elgin City	0.00%	0
Falkirk	0.00%	0
Forfar Athletic	0.00%	0
Greenock Morton	0.00%	0
Hamilton Academical	0.00%	0
Heart of Midlothian	4.69%	3
Hibernian	7.81%	5
Inverness Caledonian Thistle	0.00%	0

Independent Review into Sexual Abuse in Scottish Football

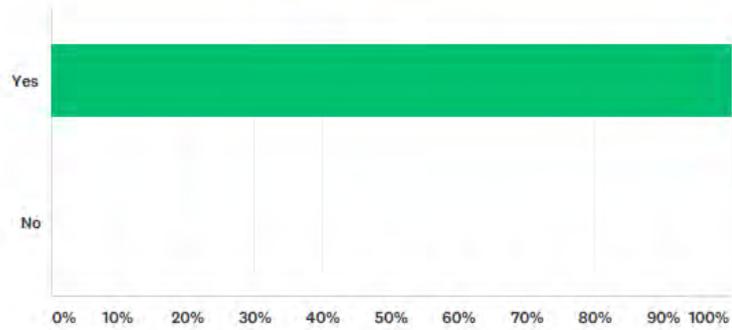
Independent Review Team's Supporters Survey

Kilmarnock	1.56%	1
Livingston	0.00%	0
Montrose	1.56%	1
Motherwell	0.00%	0
Partick Thistle	3.13%	2
Peterhead	0.00%	0
Queen of the South	1.56%	1
Queen's Park	0.00%	0
Raith Rovers	1.56%	1
Rangers	26.56%	17
Ross County	1.56%	1
St Johnstone	0.00%	0
St Mirren	0.00%	0
Stenhousemuir	0.00%	0
Stirling Albion	0.00%	0
Stranraer	0.00%	0
Other (please specify)	0.00%	0
TOTAL		64

Independent Review Team's Supporters Survey

Q5 Are you aware of issues concerning sexual abuse of children in Scottish football?

Answered: 64 Skipped: 1

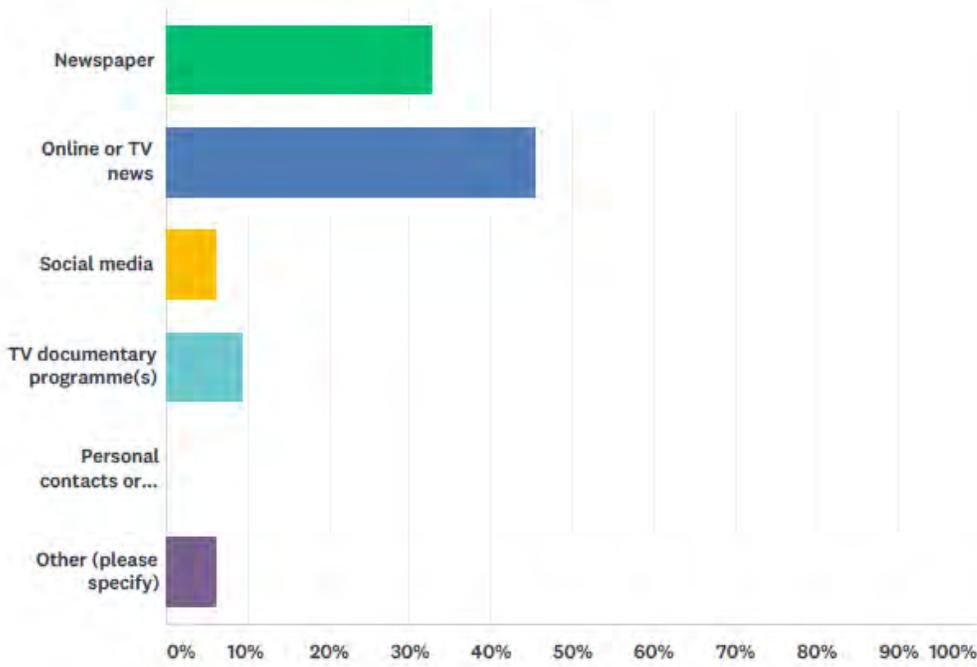


ANSWER CHOICES	RESPONSES	
Yes	100.00%	64
No	0.00%	0
TOTAL		64

Independent Review Team's Supporters Survey

Q6 If you are aware, where did you learn of these non-recent allegations?
(please tick)

Answered: 64 Skipped: 1

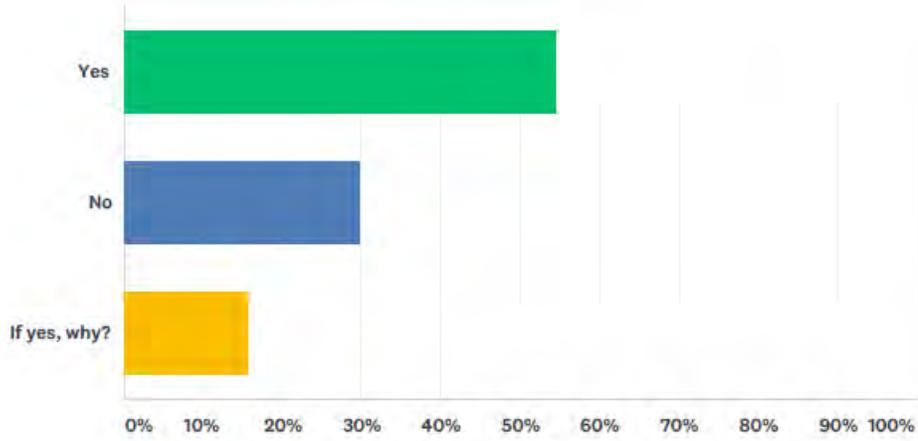


ANSWER CHOICES	RESPONSES	
Newspaper	32.81%	21
Online or TV news	45.31%	29
Social media	6.25%	4
TV documentary programme(s)	9.38%	6
Personal contacts or experience	0.00%	0
Other (please specify)	6.25%	4
TOTAL		64

Independent Review Team's Supporters Survey

Q7 Do you currently have concerns about Child Protection in Scottish Football?

Answered: 64 Skipped: 1

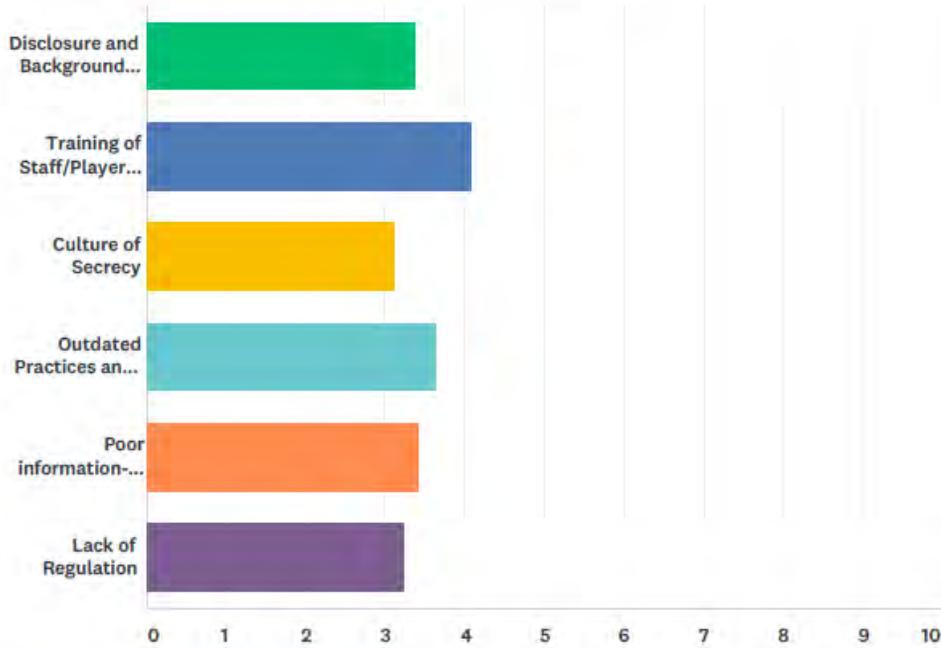


ANSWER CHOICES	RESPONSES	
Yes	54.69%	35
No	29.69%	19
If yes, why?	15.63%	10
TOTAL		64

Independent Review Team's Supporters Survey

Q8 Please rank your strongest general concerns about child protection in Scottish Football 1 = least concerned and 6 = most concerned

Answered: 64 Skipped: 1

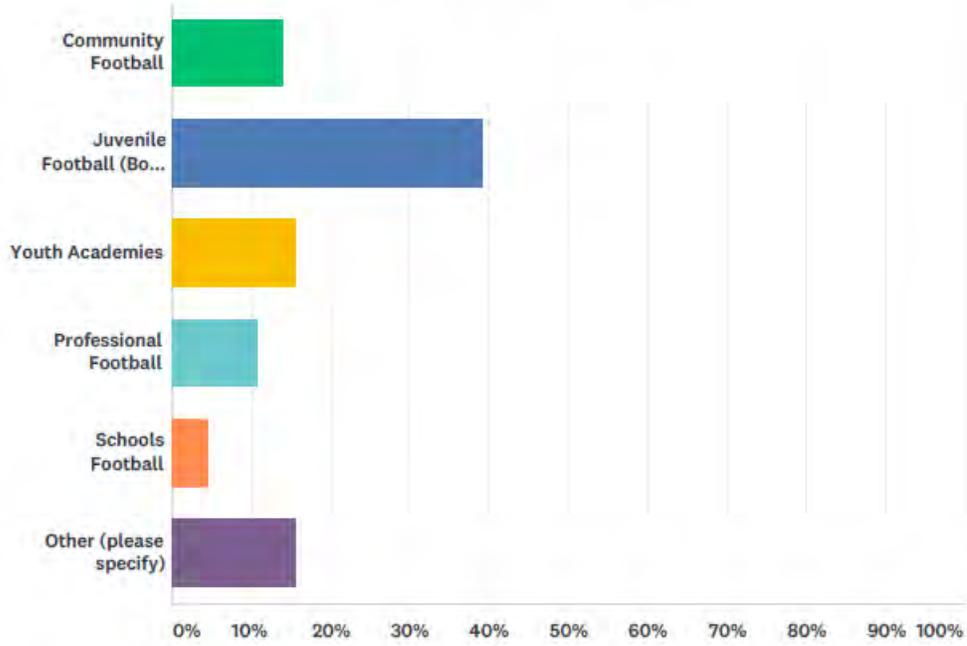


	1	2	3	4	5	6	TOTAL	SCORE
Disclosure and Background Checks	21.57% 11	17.65% 9	7.84% 4	9.80% 5	15.69% 8	27.45% 14	51	3.37
Training of Staff/Players/Volunteers	24.53% 13	20.75% 11	20.75% 11	13.21% 7	13.21% 7	7.55% 4	53	4.08
Culture of Secrecy	19.30% 11	8.77% 5	14.04% 8	10.53% 6	15.79% 9	31.58% 18	57	3.11
Outdated Practices and Policies	19.30% 11	14.04% 8	17.54% 10	17.54% 10	22.81% 13	8.77% 5	57	3.63
Poor information-sharing	8.77% 5	17.54% 10	19.30% 11	26.32% 15	17.54% 10	10.53% 6	57	3.42
Lack of Regulation	7.94% 5	17.46% 11	19.05% 12	23.81% 15	9.52% 6	22.22% 14	63	3.24

Independent Review Team's Supporters Survey

Q9 Where do you think the greatest risks to children and young people in football are? (You can select more than one answer)

Answered: 64 Skipped: 1

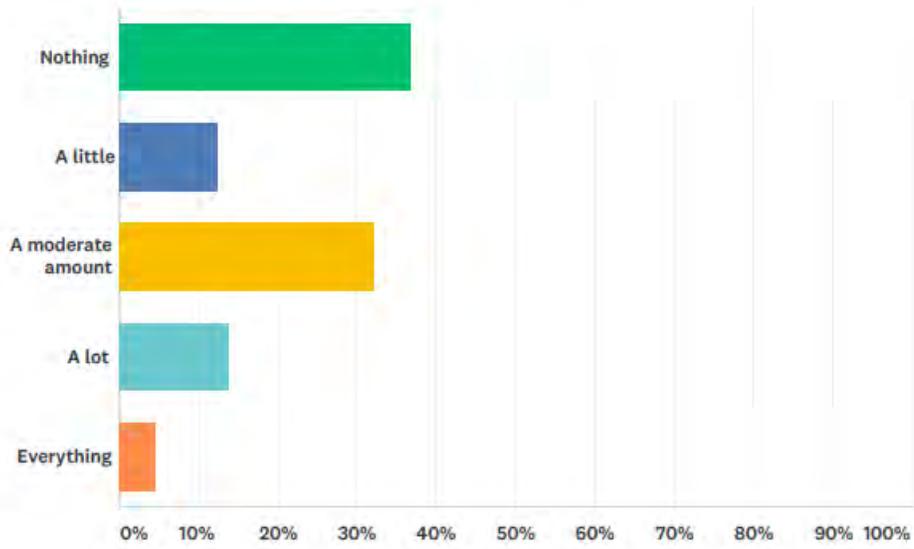


ANSWER CHOICES	RESPONSES	
Community Football	14.06%	9
Juvenile Football (Boys & Girls Clubs/under-11's etc)	39.06%	25
Youth Academies	15.63%	10
Professional Football	10.94%	7
Schools Football	4.69%	3
Other (please specify)	15.63%	10
TOTAL		64

Independent Review Team's Supporters Survey

Q10 How much do you know of your own Club's arrangements to protect children and young people?

Answered: 65 Skipped: 0



ANSWER CHOICES	RESPONSES	
Nothing	36.92%	24
A little	12.31%	8
A moderate amount	32.31%	21
A lot	13.85%	9
Everything	4.62%	3
TOTAL		65

Independent Review Team's Supporters Survey

Q11 What else do you think your Club can do to keep supporters informed about protecting young people in football

Answered: 54 Skipped: 11

Independent Review Team's Supporters Survey

Q12 What other changes would you like to see happen to make young people safer across Scottish Football?

Answered: 55 Skipped: 10

17 / 17