

Dundee Dragons Wheelchair Sports Club SCIO

Child Wellbeing and Protection Policy

Creating a Safe Environment in Sport for Children and Young People

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Policy owner: Child Wellbeing and Protection Officer (CWPO)

Important: This policy is a governance document, not a substitute for professional legal advice or for the current instructions of Police Scotland, the relevant local authority social work service, Disclosure Scotland, Children 1st or sportscotland. The club must verify contact details before approval and after any material change.

Contact details

Child Wellbeing and Protection Officer (CWPO): Elaine Swadel

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Club Chair: Dr Elizabeth Ferris

In an emergency or where a child is in immediate danger, call **999**. If a crime may have been committed but there is no immediate danger, contact Police Scotland on **101**. For a child protection concern, contact the relevant local authority social work service without delay and follow its current out-of-hours arrangements.

1. Purpose and scope

Dundee Dragons Wheelchair Sports Club SCIO is committed to promoting the wellbeing, rights and protection of every child and young person who takes part in club activities. The club will provide sport in an environment where children are listened to, treated with dignity, protected from abuse and neglect, and supported to participate safely.

This policy applies to trustees, directors, committee members, employees, coaches, officials, contractors, volunteers, parents, carers, spectators, visitors and children or young people involved in club activities. It applies at training, competition, travel, accommodation, fundraising, social events, online activity and any other activity organised or endorsed by the club.

For this policy, a **child** means anyone under 18. The club will also consider the safeguarding needs of young adults and adults who require additional support, and will follow relevant adult protection procedures where applicable.

2. Principles

The club will:

- Put the wellbeing and protection of children at the centre of decisions, while respecting their rights, dignity, privacy and evolving capacity.
- Treat every child fairly and without discrimination, including on grounds of disability, age, sex, gender reassignment, race, religion or belief, sexual orientation, pregnancy or maternity, or socio-economic background.
- Take account of the individual communication, mobility, sensory, medical, behavioural and support needs of disabled children.
- Listen to children and involve them in decisions that affect them, using accessible communication and appropriate support.
- Recognise that safeguarding is everyone's responsibility; no person must assume that someone else has reported a concern.
- Share information lawfully, securely and only to the extent necessary to protect a child or manage a legitimate club safeguarding matter.
- Never investigate an alleged abuse case beyond establishing the basic facts needed to make an appropriate referral.

The club will use the SHANARRI indicators—Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible and Included—as a child-centred way of considering wellbeing. These indicators should be considered with the child or young person and their family where appropriate, and in a way that reflects the child's development and circumstances.

3. Rights and equality

Children and young people have the right to participate in sport safely, to be heard, to be treated with respect, and to be protected from abuse, neglect, exploitation, discrimination and degrading treatment. The club will apply the principles of the UN Convention on the Rights of the Child as incorporated into Scots law, where relevant to the club's activities and responsibilities.

The club will make reasonable adjustments and provide accessible information so that disabled children can understand this policy, express their views, report concerns and participate safely. Accessibility arrangements must not reduce safeguarding standards or place a child at unnecessary risk.

4. Legal and guidance framework

This policy is intended to operate consistently with the following framework, as amended or replaced from time to time:

- Children and Young People (Scotland) Act 2014, including the wellbeing framework and SHANARRI indicators.
- UN Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024.
- National Guidance for Child Protection in Scotland 2021, updated 2023, and any later applicable update.
- Protection of Vulnerable Groups (Scotland) Act 2007 and Disclosure (Scotland) Act 2020.
- Equality Act 2010 and Human Rights Act 1998.
- Data Protection Act 2018 and UK GDPR.
- Applicable health and safety, first-aid, licensing, employment and charity-law requirements.
- Where the club offers services to people in the European Economic Area, monitors their behaviour there, or otherwise falls within its territorial scope, the EU GDPR and any applicable national law may also apply. The club will obtain advice before processing EEA children's data or appointing an EEA representative where required.

The club will review this list whenever legislation, official guidance or the club's activities change.

5. Recruitment, PVG and induction

The club will use safer recruitment procedures proportionate to each role. These may include an application, role description, interview, references, identity checks, relevant qualification checks, consideration of gaps in employment or volunteering, and a risk assessment of the duties involved.

A person must not begin a regulated role with children until the club has confirmed that the person is a member of the Protecting Vulnerable Groups (PVG) Scheme for the relevant workforce and role, or has otherwise obtained the disclosure or confirmation required by current law. The requirement applies to paid and unpaid roles where the statutory definition of a regulated role is met; it does not automatically apply to every person who may occasionally be present around children.

The club will:

- Determine and document whether a role is a regulated role before appointment.
- Use the current Disclosure Scotland process and terminology; the club will not describe a PVG record simply as a “level 2 disclosure”.
- Check PVG status or obtain the relevant disclosure through an authorised process and record only necessary information.
- Ensure PVG membership is renewed when required. From 1 April 2026, new PVG membership is time-limited and normally requires renewal every five years; the club will maintain a renewal-monitoring process and follow Disclosure Scotland’s current rules.
- Notify Disclosure Scotland when a member stops carrying out a regulated role, where required.
- Never treat a PVG check as a complete safeguarding assessment; ongoing conduct, supervision, training and reporting remain essential.
- Provide safeguarding induction before unsupervised involvement and refresher training at appropriate intervals.
- Require all relevant personnel to follow this policy, the club’s code of conduct, health and safety procedures and data protection arrangements.

A person who is unsuitable, barred, subject to a restriction, or unable to meet the applicable disclosure requirements must not undertake the relevant role. The CWPO will seek advice from Disclosure Scotland, Children 1st, sportscotland, Police Scotland or the local authority where necessary.

6. Safeguarding roles and responsibilities

6.1 Board or trustees

The Board/trustees are accountable for ensuring that the club has effective safeguarding arrangements, adequate resources, appropriate insurance and an approved policy. They will appoint a CWPO and deputy, ensure conflicts of interest are managed, review incidents and learning, and make sure safeguarding concerns are escalated appropriately.

6.2 Child Wellbeing and Protection Officer

The CWPO is the club's first point of contact for safeguarding concerns. The CWPO will:

- Receive, record and risk-assess concerns promptly.
- Make referrals to Police Scotland or the relevant local authority social work service where required, without delay.
- Contact the relevant governing body or safeguarding adviser where appropriate.
- Ensure immediate safety measures are considered, including supervision, suspension from duties or changes to activity arrangements where necessary.
- Maintain secure safeguarding records and a confidential case log.
- Advise the Board/trustees on trends, learning and policy implementation without disclosing unnecessary personal information.
- Coordinate training, safer recruitment, PVG monitoring and policy review.

The CWPO must not delay an emergency referral while trying to contact a parent, carer, club officer or another internal person. If the CWPO is unavailable or implicated, the concern must be reported to the deputy CWPO, Chair, Police Scotland or social work as appropriate.

6.3 Everyone involved in the club

Anyone who has a concern about a child, receives a disclosure or observes worrying conduct must act. They should listen, make the child safe, report the concern to the CWPO or emergency services, and make a factual record as soon as possible. They must not promise secrecy, conduct their own investigation or confront an alleged perpetrator.

7. Good practice

Adults working with children should:

- Use respectful, age-appropriate and disability-aware language.
- Keep activities open, observable and appropriately supervised.
- Explain physical assistance before providing it, use the least intrusive assistance necessary, obtain the child's agreement where practicable, and respect a refusal unless immediate safety requires action.
- Follow the child's agreed support, communication and medical plans.
- Use more than one responsible adult for activities where reasonably practicable, with appropriate ratios and risk assessments.
- Maintain professional boundaries and communicate through approved club channels.
- Challenge discriminatory, bullying, humiliating or sexualised behaviour.
- Record accidents, incidents, complaints and concerns using the club's approved forms.

Adults must not:

- Use corporal punishment, threats, humiliation, degrading treatment or aggressive discipline.
- Engage in sexualised conversation, grooming behaviour, sexual activity, intimate relationships or inappropriate physical contact with a child.
- Invite a child to a private residence or arrange unapproved one-to-one contact.
- Transport a child alone unless this has been authorised, risk-assessed and transparently recorded, or is necessary in an emergency.
- Communicate with a child through personal or disappearing-message accounts, or share personal images or information without authorisation.
- Consume alcohol or illegal drugs while responsible for children, or attend in a condition that compromises supervision.

These examples are not exhaustive. The question is whether conduct is safe, appropriate, necessary, transparent and consistent with the child's best interests and the club's code of conduct.

8. First aid, medical support and injuries

The club will maintain suitable first-aid arrangements and a current emergency plan for each venue. First aid will be provided by a suitably trained person where possible, within the person's competence and in accordance with the child's medical or support plan.

The club will obtain appropriate consent and emergency information at registration, explain how it will be used, and keep it accessible to those who need it for safe participation. In an emergency, necessary treatment and information sharing must not be delayed while waiting for consent.

Every accident, injury, first-aid intervention or significant medical incident must be recorded promptly, including the date, time, location, people involved, factual description, action taken and notifications made. Records must be stored securely and retained in accordance with the club's documented retention schedule.

9. Travel, accommodation and away trips

Every trip must have a written risk assessment covering transport, supervision, accommodation, medication, accessibility, emergency contacts, insurance, ratios, mixed-age arrangements, communication, safeguarding concerns and contingency plans.

The club will obtain relevant parental/carer information and consent, but consent does not remove the club's duty to plan and supervise safely. Adults must not share a bedroom with a child except where a documented emergency or specific care need makes this unavoidable and the arrangement is authorised and recorded.

Transport arrangements must be transparent, lawful and suitable for wheelchair users. The club will use appropriately insured drivers and vehicles, follow seatbelt and wheelchair restraint requirements, and record any exceptional one-to-one transport.

10. Bullying, discrimination and harmful behaviour

The club will not tolerate bullying, cyberbullying, harassment, discriminatory abuse, hate incidents, initiation practices, coercion or retaliation against

anyone who raises a concern. Bullying may be physical, verbal, emotional, relational, sexual or digital, and may involve a single serious incident or repeated behaviour.

Reports will be taken seriously, recorded and assessed for immediate safety, child protection and criminal concerns. The club will use proportionate, child-centred responses, which may include support, restorative work where safe and appropriate, boundaries, activity changes, disciplinary action or referral to external agencies. Restorative work must never replace a child protection referral where abuse or serious harm may be involved.

11. Photography, filming and media

The club will tell children and parents/carers why images or recordings are being made, where they may appear, how long they may be retained, and how to withdraw permission or object. The club will identify and document an appropriate lawful basis under UK GDPR; consent is not automatically the correct basis for every use.

The club will not use a fixed age of 12 as an automatic rule for image consent. It will consider the child's age, maturity, understanding, capacity and views, together with the role of parental responsibility and the lawful basis being used. Children should be given an accessible opportunity to say that they do not want an image used, and a refusal must be respected unless there is a compelling documented reason otherwise.

Images and recordings must be appropriate, activity-focused and non-sexualised. The club will avoid publishing names, locations, medical information or other identifying details unless necessary and properly authorised. Photographers, media operators and external organisations must be identified, authorised, supervised and bound by the club's safeguarding and data protection requirements.

Anyone who is concerned about a photographer, media operator or unusual request for access must report it immediately to the CWPO and, where appropriate, venue security or Police Scotland.

12. Digital communication and online safety

Official club communications with children must use approved accounts, be transparent, relevant to club activity and capable of being reviewed. Where practicable, include a parent/carer or another authorised adult in group communications and avoid one-to-one contact.

The club will not require children to use personal social media accounts or disclose unnecessary personal information. Coaches and volunteers must not privately follow, friend or message children through personal accounts, nor send inappropriate, sexualised, disappearing or late-night communications.

Online meetings, group chats and digital platforms must have clear moderation arrangements, privacy settings and reporting routes. Concerns about online grooming, sexual communication, threats, image-based abuse or exploitation must be reported as safeguarding concerns; do not forward or copy illegal images.

13. Responding to a disclosure or concern

If a child tells someone about abuse, neglect or another worry:

1. Stay calm, listen carefully and allow the child to speak at their own pace.
2. Acknowledge what has been said and reassure the child that they were right to tell someone.
3. Explain that the information cannot be kept secret because people may need to help keep them safe.
4. Ask only open, minimal questions needed to clarify immediate safety; do not interrogate, lead or repeatedly question the child.
5. Do not promise a particular outcome or confront the alleged perpetrator.
6. Consider immediate safety and urgent medical needs.
7. Report the concern immediately to the CWPO, deputy CWPO, Police Scotland or social work as appropriate.
8. Make a factual written record as soon as possible, using the child's own words where practicable, with date, time, place, witnesses, actions and people notified.
9. Store and share the record securely and only with people who need the information to safeguard the child or manage the concern.

If the allegation concerns the CWPO, report it to the deputy CWPO or Chair. If it concerns a trustee, Chair or senior club officer, report it to another trustee,

the relevant external safeguarding adviser, Police Scotland or social work. If a child is in immediate danger, call 999 before making internal notifications.

14. Allegations involving club members or other people

The club will distinguish between allegations concerning a club member, a parent/carer, another child, a visitor, a contractor or a person outside the club. The response will depend on the risk, the alleged conduct and the authority best placed to investigate.

The club will preserve relevant records and evidence, avoid contaminating accounts, and follow instructions from Police Scotland, social work, the relevant governing body and Disclosure Scotland. It will not conduct an internal disciplinary investigation into facts that may prejudice a criminal or child protection investigation. Any internal action will be risk-based, fair, confidential and separate from the external investigation where necessary.

Where information indicates that a person may be unsuitable to carry out regulated work, the club will seek advice and make any referral or notification required by law. The club will not make a disclosure or referral as punishment or without a reasonable safeguarding basis.

15. Parents, carers and information sharing

The club will normally involve a parent or carer in a concern affecting their child where this is safe, appropriate and consistent with the child's wishes and best interests. The club must not notify a parent or carer where doing so could increase risk, compromise evidence, alert an alleged perpetrator or conflict with the instructions of Police Scotland or social work.

Data protection law does not prevent necessary safeguarding information sharing. The club will identify a lawful basis, share the minimum necessary information, use secure methods, keep a record of the decision and explain information rights where doing so would not create additional risk. Consent is not required for every safeguarding disclosure.

16. Records, confidentiality and data protection

Safeguarding records must be accurate, factual, dated, securely stored and accessible only to authorised people. The club will maintain a privacy notice explaining its processing of children's and families' information, including safeguarding, health, photography, retention and information-sharing arrangements.

The club will not promise absolute confidentiality. Information will be shared on a need-to-know basis, with Police Scotland, social work, medical services, Disclosure Scotland, governing bodies or professional advisers where lawful and necessary. Records will be retained and securely destroyed according to a documented retention schedule, taking account of safeguarding, limitation, insurance, legal and regulatory requirements.

Where personal information is transferred outside the UK or received from the EEA, the club will use the safeguards and assessments required by the applicable UK GDPR and, where relevant, EU GDPR.

17. Complaints, whistleblowing and review

Anyone may raise a safeguarding concern without fear of retaliation. The club will support good-faith reporting and will take action against victimisation, intimidation or deliberate concealment of concerns.

The Board/trustees will review this policy at least annually and after a serious incident, significant learning, a material change in law or guidance, or a change in club activities. The review will check that contact details, PVG procedures, training, risk assessments, accessibility arrangements, privacy information and emergency procedures remain current.

The approved policy, code of conduct, reporting form, risk-assessment template, consent forms and privacy notice should be read together. Where documents conflict, the club must prioritise immediate safety and seek advice from the relevant statutory or professional safeguarding authority.

Appendix A: reporting record

Record only relevant facts:

- Date, time and location of concern or disclosure.
- Name, age and contact details of the child, where known.
- Exact words used by the child, where possible.
- What was observed, by whom and when.
- Immediate safety or medical action taken.
- Name of the person receiving the concern.
- Who was informed, when and by what method.
- Advice received and reference numbers.
- Reason for any decision not to inform a parent/carer immediately.
- Signature, date and secure storage location.

Appendix B: Key Contact Information

- **Police Scotland:** 101 (Non-emergency) | 999 (Emergency)
- **Dundee City Council Children's Social Work:** 01382 434019 (Out of hours: 01382 307964)
- **Children 1st / Safeguarding in Sport:** 08000 28 22 33 | children1st.org.uk
- **Volunteer Scotland Disclosure Services:** volunteerscotland.org.uk
- **NSPCC Childline:** 0800 1111

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