

Scottish Schools' FA Policy Framework

Structure

The Scottish Schools' Football Association (SSFA) consists of three strata of activity, namely:

- national level activities run by The Executive and Management Committee
- area activities, run by Affiliated Local Associations
- school activities run by Affiliated Schools

As a result, the following principles apply within this structure:

- national activities will be subject to the policies and procedures of the Scottish Schools' Football Association
- school and area activities will be subject to the policies and procedures of the school's Local Authority and, in the case of non-Local Authority schools, the child protection policies and procedures of that school

Context

The purpose of the Association is to work with schools to support and promote pupils' wellbeing through the medium of association football and related experiences, and to engage in relevant charitable enterprises.

That sets the ethical framework for Association and for the conduct of all those involved in its activities. In so doing, the Association recognises, and subscribes to, the policies of the Scottish Football Association.

This policy framework provides detail under a number of headings, namely:

- Procedures and Review
- Implementation
- Equality
- Health & Safety/Risk Management
- PVG
- Data Protection
- Social Media
- Communications
- Fraud
- Integrity

In the event of a matter not being encompassed by this policy framework, the Scottish Schools' FA will refer to the appropriate Scottish Football Association policy document.

Procedures & Review

SSFA will regularly review its procedures and selection criteria to ensure that individuals are selected, promoted and otherwise treated according to their relevant individual abilities and merits. The successful implementation of this policy framework depends on the awareness and commitment of all staff, volunteers and participants. Hence, all new staff, volunteers, and members of the Executive and Committees will be made aware of its existence and on joining the organisation and reminded they must conform to it on a regular basis.

This policy framework will be reviewed annually by the Steering Committee and subject to annual ratification by the Association's Executive committee. In addition, the Steering Committee may elect to review any element of this framework at any given point in time should circumstances dictate.

Implementation

SSFA is committed to the implementation of its policies and to a programme of action to ensure that policies are, and continue to be, fully effective. The overall responsibility for the policy lies with the General Secretary and shall be overseen by the Steering Committee as appropriate. However, all staff and volunteers are required to comply with the provisions of the policies.

Any act of discrimination by employees or any failure to comply with the terms of the policy will result in disciplinary action being determined by the STEERING Committee as appropriate.

Equality - August 2022

SSFA recognises that everyone has a contribution to make to our society and a right to equal opportunity. It is the policy of SSFA to treat all employees, volunteers and job applicants fairly and equally regardless of their sex, sexual orientation, marital status, race, colour, nationality, ethnic or national origin, religion, age, disability or union membership status. No job applicant or employee, member, volunteer or organisation/individual to which we provide services will be discriminated against by us on the above grounds.

Furthermore SSFA will ensure that no requirement or condition will be imposed without justification which could disadvantage individuals purely on any of the above grounds.

In general, this policy applies to recruitment and selection, terms and conditions of employment including pay, promotion, training, transfer and every other aspect of employment and activity

Specifically, SSFA states that:

- All employees (whether part-time, full-time or temporary), volunteers, members, and beneficiaries will be treated fairly and with respect.
- Selection for employment/volunteering, promotion, training or any other benefit will be on the basis of aptitude and ability. All selection/rejection decisions will be recorded.
- All employees/volunteers/members will be helped and encouraged to develop their full potential and the talents and resources of individuals will be fully utilised to maximise the efficiency of the organisation.
- All employees/volunteers/members have a legal and moral obligation not to discriminate and to report incidents of discrimination against any individual or group of individuals to the Board as appropriate

The SSFA commitment is:

- To create an environment in which individual differences and the contributions of all our staff, volunteers, members and beneficiaries are recognised and valued.
- Every employee, volunteer, member and beneficiary is entitled to be part of an environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- Training, development and progression opportunities are available to all staff/volunteers.
- Equality is good management practice and makes sound sense.
- Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings or membership disqualification.

Health & Safety/Risk Management – August 2022

The Health & Safety at Work Etc. Act 1974 imposes a statutory duty on organisations to ensure, in as far as is reasonably practicable, the health, safety and welfare of their employees and volunteers whilst at work. This duty also extends to others who may be affected by that work.

Employees and volunteers also have a statutory duty to take care of themselves and others who may be affected by their acts or omissions.

The Scottish Schools' FA will, in as far as is reasonably practicable, ensure that:

- + Adequate resources are provided to ensure that proper provision can be made for health & safety.
- + Risk assessments are carried out and periodically reviewed.
- + Systems of work are provided and maintained that are safe and without risks to health.
- + Arrangements for the use, handling, storage and transport of articles and substances for use at work are safe and without risks to health & safety.
- + All volunteers and employees are provided with such information, instruction and supervision as is necessary to secure their health and safety at work and the safety of others who may be affected by their action.
- + Where appropriate, health surveillance will be provided to volunteers and employees.
- + The provision and maintenance of all plant, machinery and equipment is safe and without risk to health.
- + The working environment of all employees and volunteers is safe and without risk to health and that adequate provision is made with regard to the facilities and arrangements for their welfare at work.
- + The place of work is safe and there is safe access to and egress from the work place.
- + Monitoring activities are undertaken to maintain agreed standards.

It is the duty of all employees and volunteers:

- + To take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work and co-operate with us in fulfilling our statutory duties; + Not to interfere with or misuse anything provided in the interest of health and safety.

PVG – August 2022

The Scottish Schools' FA is fully committed to safeguarding the welfare of all young people and vulnerable adults in its care. It recognises the responsibility to promote safe practice and to protect young people and vulnerable adults from harm, abuse and exploitation.

Given that the Scottish Schools' FA deals primarily with young people aged 18 years and under, this is a particularly important framework for its activities and so its policy and practices are set out in a separate document.

The policy is based on the following principles:

- The welfare of young people and vulnerable adults is the primary concern.
- All young people and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to protection from all forms of harm and abuse.
- Protecting young people and vulnerable adults is the responsibility of all staff and volunteers.
- Young people and vulnerable adults have the right to express views on all matters which affect them, should they wish to do so.
- Our organisation shall work in partnership with young people and parents/carers/teachers to promote the welfare, health and development of young people and vulnerable adults.

Data Protection – August 2022

The Association is committed to the principles of the Data Protection Act 1998. The Act regulates the way in which personal data about volunteers, employees and registered players held on computer or in certain manual filing systems is processed. Data is deemed to be personal data where specific individuals can be identified from that information.

Processing has a wide meaning and includes the collection, storage, alteration, disclosure or destruction of data.

Throughout employment and/or the period of volunteering and for as long as is necessary after termination, the Association will need to process data about employees for purposes connected with employment. The kind of data that the Association will process includes, but is not limited to, the following:

- References obtained during recruitment
- Terms and conditions of employment
- Payroll, tax and national insurance details
- Health and sickness records
- Performance and disciplinary records
- PVG Records
- Appropriate Technical Qualifications

Normally personal data will be held for management and administrative use only. However, from time to time the Association may need to disclose personal data to relevant third parties, e.g. Inland Revenue.

A data controller is the person who either alone or together with others determines the purpose for which and the manner in which any personal data is to be processed. The Association's data controller is the General Secretary who is responsible for the Association's compliance with the data protection principles listed below and to whom volunteers and employees should direct any queries regarding this policy.

Only those volunteers and employees who have specific authority to access and/or process personal data are authorised to do so and anyone else who does so is liable to disciplinary proceedings, including dismissal. Any volunteer or employee who is authorised to process personal data must comply with the principles below. Any failure to adhere to these policies or any reckless or unauthorised use or disclosure of personal data will be viewed very seriously and may result in disciplinary action, including dismissal.

The main data protection principles are as follows:

- personal data shall be processed fairly and lawfully and in particular shall not be processed unless one of the relevant conditions contained in the Data Protection Act 1998 is met, e.g. where the data subject has given consent, where the processing is required to comply with a legal obligation. There are particular requirements in relation to the processing of sensitive personal data (for example in relation to health) and the data controller should be contacted for guidance
- personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes
- personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed. The Association will not keep any more personal data than is necessary in the circumstances. The Association will periodically review its systems to ensure that no personal information which is irrelevant or excessive is retained

- personal data shall be accurate and where necessary up to date. Employees should inform the Association if there is any change to their personal information e.g. change of address, bank details
- appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing or personal data and against accidental loss or destruction of, or damage to, personal data. The Association will endeavour to keep any personal records secure by providing adequate technical and/or management systems
- personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection of the rights and freedoms of data subjects in relation to the processing of personal data.

Any volunteers or employees processing personal data will receive data protection training and should consult the data controller in relation to these principles for further guidance.

Volunteers and employees are entitled to make a subject access request. Where a volunteer or employee makes a request in writing and pays the required £10 fee, that person is entitled to be told whether the Association is processing personal data regarding that individual and, if so, to receive a description of the personal data, the purpose for which it is being processed and those to whom it is or may be disclosed. The relevant information will normally be provided in hard copy form.

The Association will comply with any properly constituted request within 40 days of receiving the written request and the fee.

Social Media *August 2022*

The Scottish Schools' FA (SSFA) seeks to ensure, as practically as possible, that all internet and social media postings and e-mails are acceptable. To achieve this requirement all users must access any internet and social media in an acceptable manner.

The SSFA accepts that internet and social media have advanced and changed the way people communicate and interact on a daily basis. Organisations and individuals involved in providing football under the jurisdiction of SSFA are increasingly using the internet and social media to promote sport and communicate with players, officials, local associations, schools, leagues and the Association.

Although these forms of social media and communication can provide benefits for those involved, they also pose potential risks to individuals and organisations taking part in activities under the jurisdiction of SSFA.

E-mail is also subject to national law, in particular the Computer Misuse Act, Copyright Act, Data Protection Act and the law of libel. The fact that e-mails can so easily and quickly be forwarded to others and that e-mails are not automatically and permanently deleted when wiped from a desktop means that defamation is a real danger. Care should be taken with the content of messages and derogatory remarks about another player, official, club or league. The same applies to indecent, sexist, racist or obscene remarks

All individuals and organisations should be aware that a breach of this policy will be viewed as serious misconduct and will entitle SSFA to take disciplinary action against the relevant individual or organisation.

All those who use or have access to information systems under the aegis of SSFA are covered by this policy and should be familiar with its content.

People should be able to use the internet without worrying about being shown inappropriate material or being abused or bullied. Potential risks can include, but are not limited to:

- bullying by peers and people they consider 'friends'
- posting personal information that can identify and locate a child offline
- sexual grooming, luring, exploitation and abuse, contact with strangers
- sexual, racial and disability harassment and/or bullying
- exposure to inappropriate content
- exposure to racist or hate material
- encouragement to post sexual images and videos of themselves online
- encouragement of violent behaviour, such as 'happy slapping'
- glorifying activities such as drug taking or excessive drinking
- physical harm to young people in making video content such as enacting and imitating stunts and risktaking activities
- leaving and running away from home as a result of contacts made online.

Players, officials, local associations, schools and leagues must consider the following:

- the purpose and intended audience for online information and activities
- how to best present information and activities online
- how to address safeguards for using or accessing social networking
- the type of content to upload e.g. photos, blogs, video clips, podcasting, discussion groups
- advice for users on linking and sharing content on to their personal web pages and/or profiles
- guidance to ensure that interactions with users take place in an appropriate manner.

Acceptable online behaviour has the following characteristics:

- respectful, polite postings
- postings that are compliant with SSFA policy on Equality and Integrity
- tolerance of postings by others.

Unacceptable online behaviour has the following characteristics:

- sending rude, offensive or harassing material
- embarrassing postings, e.g. relating to the outcome of matches
- foul and abusive language
- too intimate and detailed personal information
- breaching others' privacy
- randomly requesting friendship
- pestering a friends' friends
- stalking
- setting up or establishing virtual groups which may cause harm or discomfort to any other person
- publishing defamatory and/or knowingly false material
- revealing confidential information about a player, official, club or league including financial information, club/league plans, policies, members and/or internal discussions
- viewing, creating, sending or forwarding illegal material
- viewing, creating, sending or forwarding defamatory material
- viewing, creating, sending or forwarding pornographic or sexually explicit material

- viewing, creating, sending or forwarding material that may cause offence to others, including, but not limited to discriminatory material or material that would violate the dignity of others or create an offensive or degrading environment (whether or not that is intended) including on the grounds of sex, race (including ethnic or national origin), religion or belief, sexual orientation, disability or age.

The SSFA maintains the right to investigate internet and network traffic in relation to any person under its jurisdiction who is subject to any report. The SSFA will only attempt to monitor internet use where there is a clear sense that such an intervention is necessary in terms of the foregoing policy.

Communications – August 2022

E Mails

Any communication by way of email should be regarded in the same manner as if it was on the Association's headed paper. Information which is confidential should not normally be sent by email.

So far as is possible, employees and volunteers should avoid receiving emails with attachments or photographs which take up a lot of memory space. The Association reserves the right to delete such information from the system to free up space. Employees and volunteers are not permitted to double delete any emails.

Employees and volunteers must not commit the Association to any kind of contract or obligation through the Internet except where expressly authorised to do so by the Association. Employees and volunteers must comply with all intellectual property and copyright law. Please contact the General Secretary for guidance if required.

Employees and volunteers must not allow any other person to have knowledge of their password, with the exception of Association Office Bearers, who may require to know passwords to access information. Passwords should be changed regularly.

Interception

Employees and volunteers should not have any expectation of privacy in respect of their usage of Association computer facilities. Employees and volunteers consent to the Association intercepting, storing and monitoring emails which employees and volunteers send or receive and consent to the Association accessing their computer equipment to monitor Internet use. The Association reserves the right to intercept any email for the following reasons:

- Ensuring compliance with legal obligations
- Quality control or staff training
- Preventing or detecting crime
- Investigating or detecting breaches of this policy including excessive personal use of the Internet and sending inappropriate emails and accessing inappropriate Internet sites
- Checking for viruses or other threats to the system

Wherever possible the Association will avoid reading emails which are clearly personal. However, the Association reserves the right to monitor the amount of email traffic which an employee or volunteer is sending or receiving and to read any communication which is inappropriate. If an employee or volunteer wished to make a personal communication they should do so through the internal mail and mark this as private and confidential.

Telephone use

The telecommunications system is there for the better performance of employees and volunteers' work. While the Association accepts that employees and volunteers are entitled to make a limited amount of personal calls in

exceptional circumstances this should be kept to a minimum, and the Association reserves the right to monitor the use of the telephone system for abuse of the privilege.

The Association will keep any information which is obtained through this policy secure. The Association treats this policy very seriously and any infringement will be treated as a disciplinary matter which may lead to dismissal, including summary dismissal for gross misconduct.

Fraud – August 2022

The Scottish Schools' FA (SSFA) will not tolerate fraud. SSFA recognises that over and above any financial damage suffered, fraud may also reflect adversely on its image and reputation. Its aim therefore is to limit exposure to fraud by:

- instituting and maintaining cost effective measures and procedures to deter fraud.
- taking firm and vigorous action against any individual or group perpetrating fraud against the Association
- encouraging members to be vigilant and to report any suspicion of fraud, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- rigorously investigating instances of alleged fraud and pursuing perpetrators to seek restitution.
- assisting the police and all other appropriate authorities in the investigation of those suspected of fraud.
- the detection, prevention and reporting of fraud is the responsibility of all working and playing under the jurisdiction of SSFA and they are expected:
 - to act with integrity at all times.
 - to comply with appropriate Codes of Conduct, Standing Orders and Financial Regulations.
 - to raise concerns with the President, failing whom the Vice-President, as soon as any impropriety is suspected

Integrity – August 2022

This Policy sets out the Association's standards and procedures relating to Integrity and applies to all individuals representing the Association which includes EXECUTIVE Committee, Committee Members, Volunteers, and any other individuals acting on behalf of the Association (Associated Persons).

A core function of the Association is to maintain and be seen to be maintaining the integrity of football.

The Association supports and will co-operate with all aspects on Integrity regarding any part of football as guided by The Scottish Football Association.

All Associated Persons have an obligation to maintain the highest standards of integrity by carrying out their work in a way that will not compromise the reputation of the organisation.

Any matters raised under this policy will be investigated initially by a sub-committee of THE STEERING Committee and if required will be passed to The Security and Integrity Officer of The Scottish Football Association

The Scottish Schools' FA (SSFA) subscribes to the Integrity (Sports Betting) Policy of the Scottish FA. In so doing, SSFA will, at all times, seek to maintain, and be seen to be maintain, the integrity of football.

The Association must take action to protect itself from the threats posed to its integrity by corrupt betting and associated activity both from within and outside the organisation. As sports betting activity has increased across all sports and disciplines, it is essential that such activity does not take place in a manner which has the potential to compromise sporting conduct and endeavour.

Therefore, all office based Officials involved in activities under the jurisdiction of the SSFA cannot:

- gamble on football, anywhere in the world
- ask someone to gamble on their behalf on football anywhere in the world
- share any 'inside information' with anyone, including but not limited to spouse, cohabitee or dependent children which could enable them to gain an advantage through corrupt betting activity
- become involved in any other activity associated with corrupt betting which could reasonably be deemed as suspicious and detrimental to the image and reputation of the SSFA in particular and football in general.

The following activities are also prohibited:

- fixing a match, attempting to fix a match or any incident within a match
- soliciting, inducing, encouraging, offering a bribe (or attempting to) any other party to do any of the above
- receiving, seeking a bribe (or attempting to) in order to fix a match or attempt to fix a match or any incident within a match
- posing a threat to the integrity of the sport
- destruction of evidence in relation to a potential breach
- failing to report suspicions or approaches.

Any individual who is suspected of breaching any of the above should be immediately reported to SSFA. In the first instance the individual should report suspicions to the General Secretary, failing whom the President. On receipt of such a report, it shall immediately be forwarded to the Scottish FA's Security and Integrity Officer for determination.

August 2022