NATIONAL SMALL-BORE RIFLE ASSOCIATION



PROTECTION of CHILDREN and VULNERABLE ADULTS in TARGET SHOOTING

GUIDE TO POLICY AND PROCEDURES

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NATIONAL SMALL-BORE RIFLE ASSOCIATION

PROTECTION OF CHILDREN AND VULNERABLE ADULTS IN TARGET SHOOTING

PREFACE

The NSRA has produced this Guide to Policy and Procedures, based on material originally prepared by the Great Britain Target Shooting Federation and approved by the National Society for the Prevention of Cruelty to Children for use by the member NGBs of GBTSF.

The NSRA has also approved an Implementation Policy, which covers

- 1. the arrangements under which the Policy and Procedures are to be applied to events falling under the direct control of the NSRA, such as its National Meetings and the activities of coaches and other volunteers working on its behalf;
- 2. recommendations to NSRA-affiliated clubs and other organisations on how they should follow the policy in relation to their own activities.

There are differences between child protection legislation in the various Home Countries. This document has been written in relation to the legislation applying in England and Wales. It therefore cannot be taken as applying in other areas of the United Kingdom where some requirements as to particular procedures will differ. It is to be hoped that all the relevant shooting governing bodies will soon have equivalent documents in place taking account of the appropriate local legislation and other statutory requirements, if they do not already have them. In the meantime where there is no local policy document, the general principles contained in the NSRA's policy will provide guidance on good practice.

This Guide has been prepared largely on the basis of arrangements appropriate to the protection of children. However the arrangements should also be applied to vulnerable adults, making adjustments to the procedures followed where this is appropriate to the differing circumstances.

KEY TO TERMS & ABBREVIATIONS

Board	NSRA Board of Management.
child	A person under the age of 18, or under the age of 21 in the case of a
	person who has been in local authority care after age 18, or who suffers
	from a learning disability. (Defined by the Children Act 2004)
Children's	A service area within a Local Authority. If an incident must be reported
Social Care	to them, contact the service in the Local Authority for the place where
	the incident has occurred. They will then take responsibility for any
	referral of the matter to Children's Social Care for the place where the
	child lives, and the place where the alleged abuser lives, if they are not
	local residents.
Club	A shooting club that is affiliated to the NSRA.
coach	A person licensed by the NSRA to teach others to shoot. Such a
	person may also be appointed by the NSRA or an affiliated county
	association or club to a specific coaching position, e.g. Regional Coach,
	County Coach, Club Coach.
Coaching &	The NSRA's Coaching & Development Committee, a committee
Development	reporting to the NSRA Board.
Committee	
County	A county shooting association that is affiliated to the NSRA.
CPO	Child Protection Officer – see more information on page 11.
CPAP	The NSRA's Child Protection Appeal Panel – see page 12.
CPP	The NSRA's Child Protection Panel – see page 12.
CPSU	Child Protection in Sport Unit (see Annex III)
CRB	Criminal Records Bureau (See Annex III)
	"The role of the Criminal Records Bureau is to reduce the risk of abuse
	by ensuring that those who are unsuitable are not able to work with
	children and vulnerable adults" - The Home Secretary
CRB Check	Official check of entries on the CRB register, which must be carried out
	in respect of every person working with children and/or vulnerable
	adults. For shooting personnel, these checks are requested via the
	NSRA.
good practice	Applying methods of working which are designed to minimize (a) the
	risk of compromising the welfare of children in the shooting
	environment, and (b) the risk of allegations being made falsely or
	unfairly against the shooter/coach/official concerned. (See page 3)
licence	After obtaining an approved coaching qualification, a person may be
	licensed by the NSRA to operate as a coach.
Local Authority	Local government body that has responsibility for child protection -
	normally the County Council.
LSCB	Local Safeguarding Children Board(s), (formerly ACPCs) set up by local
	authorities under the Children Act 2004 to co-ordinate the child
	protection work of public bodies including the Police, Children's Social
	Care, health authorities, courts, Probation Service, etc. – see more
	information on page 5.
NCPO	National Child Protection Officer – see more information on page 11.
NGB	National Governing Body
official	A person appointed or directed to carry out official duties at any
	shooting event, from a club night to an international match. Such a
	person may have a formal qualification (e.g. Judge or Range
	Conducting Officer) and at higher levels will be licensed or appointed by

	the NSRA.
parent	See explanation on page 1.
poor practice	Failing to apply methods of working which will minimize the risks avoided by "good practice". (See page 4)
Region	A regional shooting organisation or body which may be affiliated to the NSRA.
SCUK	Sports Coach UK – a national organisation that runs courses for all sports. (See page 11 and Annex III)
Social Services	Generic term for the responsible sector of the Local Authority. Child protection falls within the responsibility of the service area called Children's Social Care.
staff	People employed in paid positions by shooting organisations.
volunteer	A person working unpaid for a shooting organisation or body, or independently.
vulnerable adult	There is a rather cumbersome definition in Section 59 of the Safeguarding Vulnerable Groups Act 2006. A person is a vulnerable adult if he has attained the age of 18 and is in residential accommodation, sheltered housing, domiciliary care, or lawful custody; receives health care, welfare services or benefits under S.57 of the Health and Social Care Act 2001; is subject to a supervision order; requires assistance in the conduct of his own affairs; has particular needs because of age, or has any form of disability.
young person	See explanation on page 1.

INTRODUCTION

The National Small-bore Rifle Association's position is that child protection is <u>everyone's</u> responsibility.

Child abuse can and does occur outside the family setting. It can happen wherever there are children and at any time; at school, in the park, at the club. Sadly, there are some people who seek to be where children are simply in order to abuse them. Available information indicates that abuse that takes place within a public setting is rarely a one-off event.

Everyone in the NSRA and its member clubs and organisations has a part to play in looking after the children with whom they are working. This is both a moral and a legal obligation.

If these procedures are to protect children, everyone involved in shooting needs to see and discuss this Guide. The NSRA is therefore asking all Coaches and Officials to make sure that the Guide is widely distributed and discussed at club, county, regional and national level. It is also important that everyone knows the identity of the Child Protection Officer (CPO) for their own organisation.

If you have any doubts about the procedures and what constitutes good practice in this area please contact the NSRA for further guidance.

THE PRINCIPLES OF CHILD PROTECTION

The guidance given in this Guide is based on the following principles:

- The welfare of young people (the Children Act 1989 defines a young person as under 18 years of age) and vulnerable adults must be the primary concern of any person working with them.
- It is the responsibility of all organisations to take reasonable precautions to prevent unsuitable persons having the opportunity to come into contact with the children and/or vulnerable adults participating in their activities.
- All young people, whatever their age, culture, disability, gender, language, racial origin, religious belief or sexual identity have the right to protection from abuse.
- It is the responsibility of child protection experts to determine whether or not abuse has taken place, but it is everyone's responsibility to report any concerns (i.e. anything that makes them suspect that some form of abuse may have taken place).
- All incidents of suspicious or poor practice and all allegations must be taken seriously. They must be responded to swiftly and appropriately.
- Confidentiality must be maintained in accordance with the Data Protection Act 1998 and the Human Rights Act 1998 (see more detailed information on page 16).

<u>NOTE</u>: Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children. (Protection of Children Act 1999)

EXPLANATION OF USE OF TERMS

Please note that the word "**parents**" is used throughout this Guide as a generic term to represent parents, carers and guardians.

The principles for **children** and **young people** also apply to shooters with disabilities and to vulnerable adults.¹

¹ See section 9 of the Children Act 2004: "Any reference to a child includes, in addition to a person under 18, a person aged 18, 19 or 20 who...has been looked after by a local authority at any time after the age of 16 or has a learning disability."

TYPES OF ABUSE

It is generally acknowledged that there are four main types of abuse – Physical, Sexual, Emotional and Neglect.

- **Physical Abuse** is just what the term implies hurting or injuring a child, for example by hitting or shaking them. It might also occur if a child is forced to train beyond his/her capabilities. Bullying is likely to come into this category.²
- Sexual Abuse occurs when a child knowingly or unknowingly takes part in something which
 meets the sexual needs of the other person or persons involved it could range from sexuallysuggestive comments to full intercourse.
- **Emotional Abuse** occurs when a child is not given love, help and encouragement, is constantly derided or ridiculed, or perhaps even worse, is ignored. Conversely, it can also occur if a child is over-protected. It is present in the unrealistic expectations of parents and coaches as to what a child can achieve. Racially and sexually abusive remarks constitute emotional abuse, and it can be a feature of bullying.
- **Neglect** usually means failing to meet children's basic needs, such as food, warmth, adequate clothing, medical attention, etc. It could also mean failing to ensure they are safe, or exposing them to harm.

INDICATIONS OF CHILD ABUSE

Recognising child abuse is not always easy, even for experts. The examples below are not a complete list, and they are only indicators that abuse may have occurred – not confirmation that it has actually occurred.

- **Information** The child says that she or he is being abused, or another person says they believe (or actually know) that abuse is occurring.
- Injuries The child has an injury for which the explanation seems inconsistent.
- **Behaviour changes** The child's behavior changes, either over time or quite suddenly; he or she becomes quiet and withdrawn, or alternatively becomes aggressive.
- **Reaction to others** The child appears not to trust adults, especially a parent or coach with whom she or he would be expected to have, or did once have, a close relationship, and does not seem to be able to make friends.
- **Appearance** The child becomes increasingly neglected in appearance, and may lose or gain weight for no apparent reason.
- **Sexual awareness** the child shows inappropriate sexual awareness for his/her age, and sometimes behaves in a sexually explicit way.

REMEMBER that physically disabled children and children with learning difficulties are particularly vulnerable to abuse, and may have added difficulties in communicating about what is happening to them.

^{2} See the section on Bullying – pp. 8-9.

GOOD PRACTICE

Everyone involved in shooting is expected to demonstrate good behaviour in order to protect children, and to protect themselves against allegations. The following are common-sense examples of how to create a positive environment within shooting:

Examples of Good Practice

- Always work in an open environment (e.g. avoid private or unobserved situations), and encourage an open environment between others (e.g. no secrets).
- Treat all young people/vulnerable adults equally, and respect their dignity.
- Always put the welfare of each young person first, ahead of winning or achieving goals.
- Maintain a safe, appropriate distance in your dealings with young people; e.g. it is not appropriate to have an intimate relationship with a child, or to share a room with them.
- Build balanced relationships based on mutual trust which empowers children to share in the decision-making process.
- Make sport fun and enjoyable, and promote fair play.
- Ensure that if any form of manual/physical contact is required, it is done openly and according to good coaching practice promoted by the NSRA. Care is needed when adjusting hand and body positions, as well as assisting with shooting equipment. Young people should always be consulted and their agreement obtained. If necessary, parents should be told what needs to be done and why and their agreement obtained.
- Coaches should give information to parents and young people about their coaching methods and style. They should explain that if any form of manual/physical contact needs to be done by the coach it is either done for safety reasons, or there is simply no other way to do it. The parents and young people should "sign up" to the coach's style and give consent to his actions.
- Keep technical skills, qualifications and insurance up to date.
- Involve parents wherever possible; e.g. to supervise their children in changing rooms.
- Ensure that if mixed teams are taken away, they are always accompanied by a male and a female member of staff. (NB however; same-gender abuse can also occur.)
- Ensure that at events where shooters stay away from home, adults do not enter children's rooms nor invite children into their rooms (formal room checks must always be done with two or more members of staff).
- Be an excellent role model this includes not smoking or drinking alcohol in the company of young people.
- Give enthusiastic and constructive feedback rather than negative criticism.
- Avoid excessive training or competition and pushing shooters against their will. Recognise each individual's needs and capabilities.
- Secure parental consent in writing to acting *in loco parentis* (in place of a parent) if it may be necessary to give permission for emergency first aid and/or medical treatment.
- Be aware of any medicines being taken by participants, and any existing injuries.
- Keep a written record of any injury that occurs, with the details of any treatment given.
- Obtain written parental consent if officials/coaches are required to transport young people in their cars.

REMEMBER: Although any physical contact requires a level of agreement, safety must NEVER be compromised.

What Not To Do

The following actions or activities should be avoided unless they are necessary in an emergency. If situations arise where these actions are unavoidable they should only occur with the full knowledge and consent of someone in charge within the organisation, or of the child's parents; for example, if a child sustains an injury and needs to go to hospital, or a parent fails to arrive to pick a child up at the end of a session.

NEVER:

- Engage in rough, physical or sexually-provocative games, including horseplay;
- Share a room with a child;
- Allow or engage in any form of inappropriate touching;
- Allow children to use inappropriate language unchallenged;
- Make sexually suggestive comments to a child, even in fun;
- Reduce a child to tears as a form of control;
- Allow allegations made by a child to go unchallenged, unrecorded or not acted upon;
- Do things of a personal nature for children or disabled adults that they can do for themselves;*
- Invite or allow children to stay with you at your home unsupervised;
- Spend excessive amounts of time alone with children away from others;
- Take children to your home where they will be alone with you.

*It may sometimes be necessary for staff or volunteers to do things of a personal nature for children, particularly if they are young or are disabled. These tasks should only be carried out with the full understanding and consent of parents and of the children involved. Be responsive to a person's reactions. If a person is fully dependent on you, discuss with him/her what you are doing, and give choices where possible. This is particularly important if you are involved in putting on or removing outer clothing, or where there is physical contact in lifting the person or assisting them to carry out particular activities. Avoid taking on responsibility for tasks for which you are not appropriately trained.

Handling Potentially Difficult Situations

If a young shooter:

- is accidentally hurt during practice, or
- seems distressed in any manner, or
- appears to be sexually aroused by your actions, or
- misunderstands or misinterprets something you have done,

then you should:

- report the incident immediately to the CPO³, and
- report the incident immediately to another colleague, and
- make a written record of the event (including a note of anyone who witnessed it), and
- inform the shooter's parents of the incident.

TAKING ACTION

You may be prompted to take action by:-

- **Concerns** developing from minor indications that there may be something wrong.
- Suspicions arising from discovery of some clear indications that there is a problem.
- **Disclosure** of first-hand information by a victim or someone else.
- Accusation a straight allegation or statement that abuse has taken place, made by the victim or someone else, who may be the victim's relative or friend, or might have been a witness.

³ See Key to Terms & Abbreviations, pp. iv-v.

Acting on Concerns or Suspicions

It is not the responsibility of anyone working under the auspices of the NSRA in a paid or voluntary capacity, nor of those working in affiliated organisations, to take responsibility for deciding whether or not child abuse is taking place. However, it is our responsibility to report any concerns or suspicions to the Police and Social Services⁴.

Seeking Advice

Occasionally the CPO may be informed of situations where it is unclear what action to take. Also, there may be circumstances where concerns are about poor practice rather than abuse. In such cases those responsible should always consult senior colleagues and obtain advice from Social Services, Police or the NSPCC if there is any doubt. This is because an incident or allegation may be just one of a series of other instances which together cause concern.

Sources of Expert Advice

- Telephone the Children's Social Care service responsible for the place where the incident has occurred and speak to the duty worker, the Local Authority CPO or out of hours duty worker.
- The NSPCC's 24-hour Freefone helpline is on 0808 800 5000.
- The Police have specially-trained child protection teams who will give guidance and support, and which have out-of-office-hours enquiries facilities.
- In an emergency or where a child requires immediate medical attention or assistance, call 999.

Social Services and the Police

The Local Authority and the Police have statutory duties under the Children Acts 1989 and 2004 to ensure the welfare of children, and to work with the Local Safeguarding Children Boards (LSCBs). When a child protection referral is made, the Local Authority staff has a statutory responsibility to investigate. This may involve talking to the child and family, and gathering information from other people who know the child. Enquires may be carried out jointly with the Police. If action needs to be taken urgently and out of office hours, then the Police will deal with the enquiry sensitively and effectively.

Records and Information

Information passed to the Social Services or the Police must be as helpful as possible, hence the necessity for making a detailed record at the time of the disclosure or when the concern arose. Such information should include the following:

- The child's personal details (full name, address, telephone number, DOB/age, etc.).
- The nature of the allegation.
- A description of any visible bruising or other injuries.
- The child's account, if it can be given, of what has happened and how any bruising or other injuries occurred.
- Witnesses to the incident(s).
- Any times, dates or other relevant information.
- A clear distinction between what is fact, opinion or hearsay⁵.

Reporting the matter to the Police or Children's Social Care service should not be delayed by attempts to obtain more information. Wherever possible, referrals telephoned to Children's Social Care should be confirmed in writing within 24 hours. A record should also be made of the name

⁴ See Key to Terms and Abbreviations on pp. iv-v.

⁵ Hearsay is "second-hand" evidence; i.e. it is given not by the person who actually said or saw something, but by another person who heard them say or describe it.

and designation of the Children's Social Care member of staff or Police officer to whom the concerns were passed, together with the time and date of the call, in case any follow-up is needed. There is provision for such information to be noted on the Incident Record Form (See Annex II). Copies of this information should be sent to the NSRA CPO and to the Local Authority CPO.

Sharing Concerns with Parents

There is always a requirement to work in partnership with parents or carers where there are concerns about their children. Therefore, in most situations, it would be important to talk to parents or carers to help clarify any initial concerns. For example, if a child seems withdrawn, there may be a reasonable explanation; he/she may have experienced an upset in the family, such as a bereavement, or parental separation/divorce.

When Not to Share Concerns with Parents

There are circumstances in which a young person might be placed at even greater risk if concerns are shared with parents (e.g. where a parent or carer may be responsible for the abuse, or may not be able to respond to the situation appropriately). In these cases or where concerns still exist, any suspicion, allegation or incident of abuse must be reported to the person in charge as soon as possible, and recorded. Advice and guidance should be sought from the local Local Authority CPO on the question of conferring with parents.

Depending on the circumstances, and the time of day, the "person in charge" might be, for instance, the CPO of the body that is running an event, a Range Officer or other official at a competition, a team manager, the event manager, or the manager of the facility where the event is taking place.

Responding to Disclosure

There is a whole range of ways in which disclosure may occur. If a young person says or indicates that he/she is being abused, or information is obtained which gives rise to concern that a young person is being abused, you should react immediately.

What to do

The person receiving information concerning disclosure should:

- React calmly so as not to frighten the child.
- Tell the child he/she is not to blame and that he/she was right to tell what he/she knows.
- Take what the child says seriously, recognising the difficulties inherent in interpreting what is said by a child who has a speech disability and/or differences in language.
- Keep questions to the absolute minimum to ensure a clear and accurate understanding of what has been said, and to avoid putting words into the child's mouth.
- Reassure the child, but not make promises of confidentiality which it might not be possible to keep in the light of subsequent developments.
- Make a full written record of what had been said, heard and/or seen as soon as possible.

Note: Not all young or vulnerable people are able to express themselves verbally. Communication difficulties may mean that it is hard for them to complain or be understood. Sometimes it is difficult to distinguish the signs of abuse from the symptoms of some disabilities or conditions that may be relevant to the nature of an individual's impairment. However, where there are concerns about the safety of a vulnerable person, whether a child or an adult, record what has been observed in detail and follow the procedures in this Guide to report these concerns. Where the procedures in place do not appear to meet the needs arising in a particular case, the advice of Social Services should be sought.

What not to do

The person receiving the disclosure should not:

- Panic;
- Allow their shock or distaste to show;
- Probe for more information than is offered;
- Speculate or make assumptions;
- Make negative comments about the alleged abuser;
- Approach the alleged abuser;
- Make promises or agree to keep secrets.

BULLYING

It is important to recognise that not all cases of abuse involve an adult abusing a young person. The abuser may be another young person; for example in the case of bullying. Bullying may be seen as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves.

Forms of Bullying

It can take many forms, the main types are:

- Physical e.g. hitting, kicking and theft.
- **Verbal** e.g. name-calling, constant teasing, sarcasm, racist or homophobic taunts, threats, graffiti and gestures.
- **Emotional** e.g. tormenting, ridiculing, humiliating and ignoring. This includes comments circulated in electronic forms, such as text messages and via the internet.
- Sexual e.g. unwanted physical contact or abusive comments.

Potential Victims

Although anyone can be the target of bullying, victims are typically shy, sensitive and perhaps anxious or insecure. Sometimes they are singled out for physical reasons — being overweight, physically small, having a disability or belonging to a different race, faith or culture.

Potential Bullies

Both girls and boys can be bullies, but it seems to be more conspicuous in boys. Although bullying often takes place in schools, research shows it can and does occur anywhere where there is little or inadequate supervision — on the way to and from school, at a sporting event, in the playground and in changing rooms.

Bullies come from all walks of life; they bully for a variety of different reasons, and may even have been abused themselves. Typically, bullies can have low self-esteem, be excitable, aggressive and jealous. Crucially, they have learned how to gain power over others, and there is increasing evidence to suggest that this abuse of power can lead to crime.

Bullies in Sport

The competitive nature of sport makes it an ideal environment for the bully. The bully in sport can be:

- A parent who pushes too hard;
- A coach who adopts a win-at-all-costs philosophy;
- A player who intimidates inappropriately;
- An official who places unfair pressure on a person.

Effects of Bullying on the Victim

The damage inflicted by bullying is frequently under-estimated. It can cause considerable distress to children and vulnerable adults, to the extent that it affects their health and development, or in extreme cases causes them significant harm (including self-harm).

There are a number of signs that may indicate that a young person or vulnerable adult is being bullied:

- Behavioural changes, such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, emotionally up and down; reluctance to go to school, training or sports club.
- A drop off in performance at school, or in their standard of play.
- Physical signs such as stomach-aches, headaches, difficulty in sleeping, bed-wetting, scratches and bruises, damaged clothes, and bingeing on food, cigarettes or alcohol.
- A shortage of money, or frequent loss of possessions.

Action if Bullying is Suspected

The same procedure should be followed as set out in previous categories if bullying is suspected. All settings in which children are provided with services or are living away from home should have rigorously-enforced anti-bullying strategies in place.

Action to Help the Victim and to Prevent Bullying in Shooting

- Take all signs of bullying very seriously.
- Encourage all children to speak and share their concerns.
- Help the victim to speak out and tell the person in charge at the club or school (an official or senior member of staff), or someone else in authority.
- Create an open environment.
- Investigate all allegations and take action to ensure the victim is safe. Speak to the victim and the bully separately.
- Reassure the victim that you can be trusted and will help him/her, although you cannot promise to tell no-one else.
- Keep records of what is said (by whom and when), and what happened.
- Report any concerns to the person in charge at the club or school (wherever the bullying is occurring).

Action Towards the Bully

The coach or person in charge should:

- Talk to the bully, explain the situation, and try to get him/her to understand the consequences of his/her behaviour. Seek an apology to the victim.
- Inform the bully's parents.
- Insist on the return of borrowed items, and that the bully compensates the victim.
- Provide support for the victim's coach, firstly because he/she may have reported the bullying, and secondly to help him/her to deal with its effect on the victim.
- Impose sanctions as necessary.
- Encourage the bully to change his/her behaviour, and support his/her efforts to do so.
- Hold meetings with the families of both the victim and the bully to report on progress.
- Inform relevant organisation members of action taken.
- Keep a written record of all action taken.

THE NSRA'S DUTIES AND RESPONSIBILITIES

The NSRA will:

- Accept the moral and legal responsibility, under its duty of care for young people, for implementing procedures to safeguard their well-being and to protect them from abuse.
- Respect and promote the rights, wishes and feelings of all young people and vulnerable adults.
- Ensure that its employees and volunteers adopt best practice in order to safeguard and protect young people from abuse, and to protect themselves against false allegations.
- Require staff and volunteers to adopt and abide by the NSRA's Codes on Equality and Sexual Harassment, and its Child Protection Policy and Procedures set out in this Guide.
- Respond to any allegation appropriately, and implement its disciplinary and appeals procedures in the event that an allegation is proved to be true.

CHILD PROTECTION PERSONNEL STRUCTURE IN SHOOTING

Child Protection Officers (CPOs)

In order for the NSRA's Policy to be effective, designated persons responsible for the protection and welfare of children and vulnerable adults, known as "Child Protection Officers" (CPOs), will be required at all levels.

A CPO does not need any prior specialist knowledge in order to be appointed to that role. However in considering candidates for appointment, all organisations must bear in mind that the person selected must be 100% reliable in terms of discretion, and must fully understand the vital importance of confidentiality in handling any issues that occur. They must also make themselves familiar with this policy and the arrangements for applying the policy within the organisation appointing them.

Clubs

Where the club has junior or vulnerable adult members, or runs events that are likely to involve junior or vulnerable adult shooters:

- Club should appoint a CPO.
- Club CPO undergoes CRB check⁶.
- Club CPO receives copy of the NSRA's Child Protection guide.

Counties

If a county training squad exists, or competitions take place at county level:

- County should appoint a CPO.
- County CPO undergoes CRB check⁶.
- County CPO receives copy of the NSRA's Child Protection guide.

Regions (including Home Countries)

If a regional training squad exists or competitions take place at regional level:

- Regional squad or organisation should appoint a CPO.
- Regional CPO undergoes CRB check⁶.
- Regional CPO receives copy of the NSRA's Child Protection guide.

National Small-bore Rifle Association

- The NSRA will appoint a National CPO.
- NCPO undergoes CRB check⁶.
- NCPO attends SCUK⁶ "Good Practice and Child Protection" course.
- NCPO receives copy of the NSRA's Child Protection guide.

The NCPO has the following additional responsibilities:

- Maintaining an up-to-date list of CPOs at the respective levels.
- Providing a contact point at the NSRA for Child Protection issues.
- Disseminating information on Child Protection policy, procedures and issues.
- Arranging for publication to NSRA-affiliated organisations of up-dating information on Child Protection.
- Giving advice to organisations affiliated to the NSRA.

All CPOs

In the event of a disclosure, suspicion or allegation of child abuse it is the responsibility of the CPO to inform Children's Social Care or the Police without delay. In the absence of a CPO at any level, or if the concern is about the CPO him/herself, the official in the organisation who receives the concerns should immediately contact Children's Social Care or the Police.

⁶ See Key to Terms & Abbreviations, pp. iv-v. *November 2009*

The person reporting to Children's Social Care or the Police should give his/her contact details. If he/she has concerns about this he/she should contact the NCPO, or inform the Police or Children's Social Care about problems with confidentiality.

Children's Social Care, together with the CPO where appropriate, will decide how and when parents or carers are to be informed.

All incidents should also be reported to the NCPO, and to the Local Authority CPO if this has not already been done (e.g. because the initial report was to the Police).

It is also the responsibility of all CPOs to ensure that relevant contact details for Social Services, Police, the NCPO and appropriate officials of the organisation are kept up to date and are readily available or on permanent display at venues for which the CPO is responsible.

NSRA Committees and Panels

The NSRA **Coaching & Development Committee**, with advice from the NSRA Child Protection Panel, is responsible for development of procedures, policies and systems for child welfare in shooting.

The NSRA Child Protection Panel is responsible for dealing with:

- individual cases of child abuse in shooting;
- issues arising from CRB checks conducted on individuals involved in shooting.

The CPP decides the route that any investigations within the sport will take, but will not slow down the essential response to concerns or allegations, nor prevent the people involved contacting the Police or Children's Social Care.

In all circumstances, when a Police or Local Authority investigation is taking place the CPP will, on receipt of information resulting from those investigations, decide what steps should be taken in the light of the information provided. The steps may include disciplinary procedures.

Any investigation will take place after the Police or Local Authority investigation has been completed. After a decision has been reached by the Local Authority or Police, or by a court of law, the CPP will take into account their findings in its consideration and recommendations on what further action may be appropriate.

The CPP is appointed by, and responsible to the NSRA Board. The Panel has a pool of members drawn from three groups:

- Members of the NSRA Board;
- Individual Members of the NSRA;
- NSRA Staff.

The Panel may also seek advice from external specialists in dealing with cases.

The NSRA **Child Protection Appeal Panel** (CPAP) considers appeals against the decisions of the CPP. Members of the CPAP are drawn from the pool of members of the CPP, but will only be appointed to hear an appeal if they have not been involved with the case as a member of the CPP.

RESPONDING TO SUSPICIONS, DISCLOSURE AND ALLEGATIONS WITHIN SHOOTING

The NSRA will respond to:

- Any disclosure, suspicion or allegation of poor practice within the sport.
- Any disclosure, suspicion or allegation made against a person who is involved in the sport but relating to that person's activities outside the sport.

The flow diagrams on pages 15 and 16 show the pathways for dealing with concerns relating to incidents both within and outside shooting. Simply put, if you are concerned about someone's behaviour, or about the welfare of a child, you should:

- Deal with medical emergencies first inform the doctor or medical staff that there may be a child protection issue.
- Report the incident to the Club, County or Regional CPO (whichever is appropriate), who will inform the NCPO.
- Complete an Incident Report Form (see Annex II)
- Report the incident to the Police or Children's Social Care if appropriate, recording the name and designation of the Children's Social Care member of staff or Police officer to whom the concerns were notified, together with the time and date of the call, in case any follow-up is needed.

Flow-chart 1 – Dealing with Concerns or Disclosure Within Shooting This applies where:

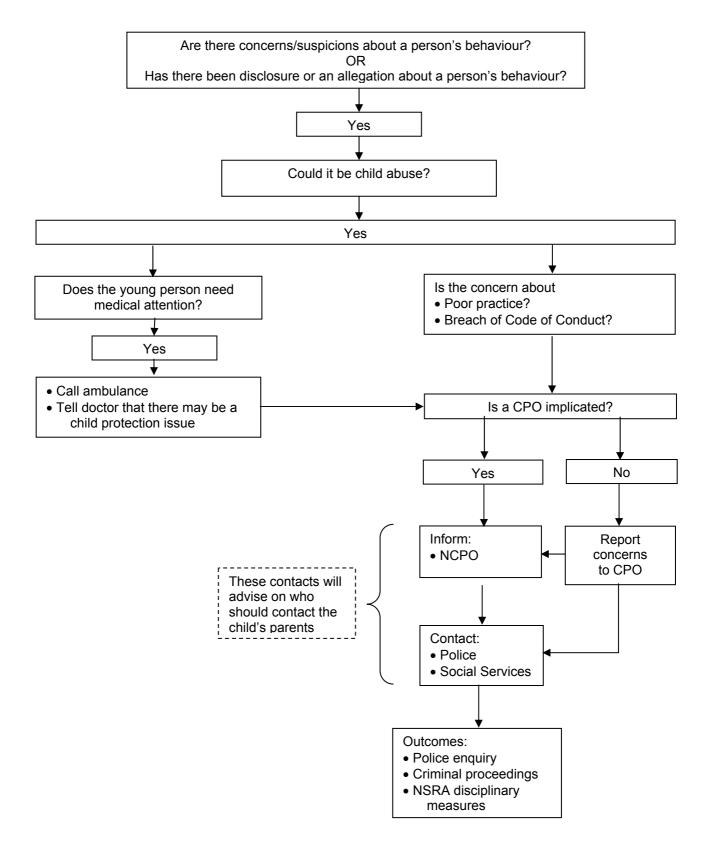
- the incident concerned takes place within the shooting environment, and/or
- the suspected abuser operates in some capacity within the shooting sport (i.e. is a shooter, coach, official, or employee of a shooting organisation).

Flow-chart 2 – Dealing with Concerns or Disclosure Outside Shooting

This shows the course of action where:

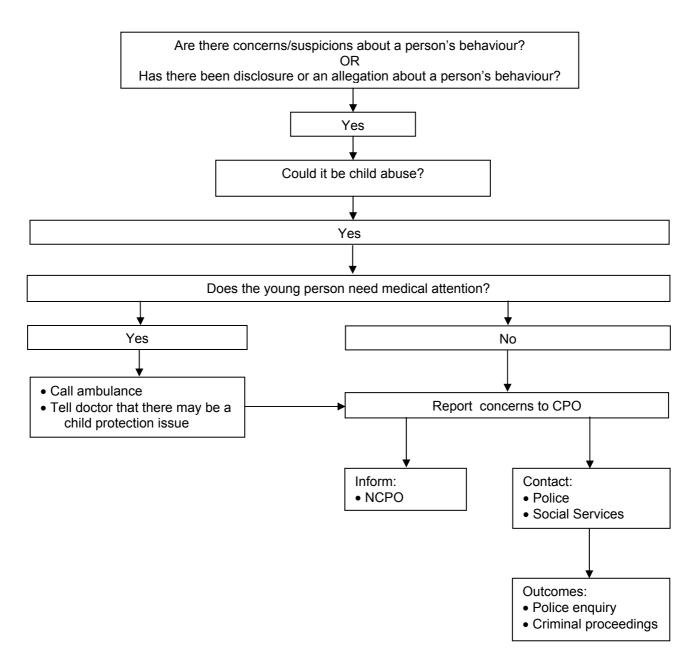
- the suspected abuser operates in some capacity within the shooting sport, but
- the incident itself is not linked to shooting, and
- the suspected/alleged victim has no connection with shooting.

Flow-chart 1 Dealing with Concerns, Suspicions or Disclosure Within Shooting



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Flow-chart 2 Dealing with Concerns, Suspicions or Disclosure Outside Shooting



DEALING WITH ALLEGATIONS AGAINST STAFF AND VOLUNTEERS

The expression "staff and volunteers" covers anyone working with children within the sport, whether in a paid or voluntary capacity. Thus it includes, for example, volunteers or helpers in clubs, tournament officials, coaches, and team managers on training camps or championships.

Allegations of Previous Abuse

Allegations of abuse may be made a long time after the event (e.g. by an adult who was abused as a child). These may relate to a person who is still working with children, so other children, either within or outside shooting, may be at risk from that person. Where such an allegation is made, the NSRA will follow the procedures outlined on page 14, and will report the matter to Children's Social Care or the Police.

The NSRA will investigate any allegations of previous abuse or poor practice within the sport, and will act on the findings of any investigations by the Police or Local Authority.

Confidentiality

Every effort must be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a "need-to-know" basis only. This covers the following personnel:

- The person making the allegation.
- The parents of the person who is alleged to have been abused.
- The alleged abuser (and his/her parents if he/she is a child).
- Anyone who is retained by the alleged abuser to represent his/her interests (e.g. a lawyer, or a lay representative in disciplinary proceedings)
- Children's Social Care
- Police
- The CPO to whom the incident was initially reported.
- The NCPO and members of the CPP.

All information about an incident must be stored in a secure place with access restricted to designated people. It must be dealt with in accordance with data protection regulations (these require that information is accurate, regularly up-dated, relevant and secure). The security requirement means that such information must <u>not</u> be communicated via e-mail or text-message, nor in messages left on telephone answering services. All communications sent by post must be clearly marked "Strictly confidential, to be opened by addressee only".

Investigation of Suspected Abuse

Where there is an allegation of abuse against a member of staff or a volunteer, there may be three types of investigation leading to one or more hearing(s) before tribunals:

- Criminal, by the Police, leading to prosecution in the Magistrates' or Crown Court.
- Child protection, by the Local Authority, leading to measures to prevent further abuse.
- Disciplinary or misconduct, by the appropriate shooting organisation(s), leading to disciplinary proceedings.

Civil proceedings seeking damages (i.e. financial compensation) may also be initiated by the victim of the abuse, or by his/her parents/guardians if he/she is a minor.

The results of investigations by the Police and Local Authority may well influence the NSRA's disciplinary investigation, but not necessarily.

Further information on the potential actions of the Local Authority may be found in the local LSCB guidelines⁷.

Action if Abuse is Suspected

(See also page 13 and the flow-charts on pages 14 and 15)

Any suspicion that a child has been abused by either a member of staff or a volunteer should be reported first to the CPO of the organisation for whom the suspected person is working. The CPO will take such steps as are necessary to ensure the safety (within the shooting environment) of the child in question, and of any other child who may be at risk.

The CPO will refer the allegation to the local Children's Social Care, who may involve the Police. The CPO should go directly to the Police if it is out of office hours.

The parents or carers of the child will be contacted as soon as possible, in accordance with whatever advice the Children's Social Care service may give – this will depend on the circumstances of the particular case.

Children's Social Care will also advise on who should approach the alleged abuser.

The CPO should also notify the NSRA's CPP via the NCPO, and liaise with the local authority's CPO, who will decide who should deal with any media enquiries.

If the NCPO him/herself is the subject of the suspicion/allegation, the report must be made directly to the CPP, the members of which are then responsible for taking the action outlined above.

Support for Personnel Involved in an Incident

For Reporter of Suspected Abuse

It is acknowledged that feelings generated by the discovery that a member of staff or volunteer is, or may be, abusing a child, may be difficult for other staff or volunteers to manage. This includes the difficulties inherent in reporting such sensitive matters. The NSRA assures all staff and volunteers that it will fully support and protect anyone who, in good faith (without malicious intent), reports his or her concerns about a colleague's practices, or the possibility that a child may be being abused.

For Suspected/Alleged Abuser

Consideration should be given to what support is appropriate for the alleged perpetrator of the abuse. An NSRA link will be set up for the accused person to use while investigations are being carried out.

For Others Aware of the Incident

Consideration should be given to what support may be necessary for children, parents and other members of staff who know about an incident but are not directly involved in it. Use of telephone help-lines, support groups and open meetings will maintain an open culture and help the healing process. The British Association of Counselling⁸ may be a useful resource.

⁷ "Every local authority has a Local Safeguarding Children Board which provides inter-agency guidelines for child protection. Club Welfare Officers need to be aware of their local LSCB guidelines..." – CPSU website (see Annex III)
⁸ See Annex III

Definition of "offence"

In this section, "offence" means:

- Any one or more of the offences against a child set out in Schedule 4 to the Criminal Justice and Court Services Act 2000, and/or
- Any action or activity which reasonably causes the NSRA Board, CPP or NCPO to believe that the individual accused of the offence is or may be a risk or potential risk to children or young persons.

Receipt of Information Initiating Interim Action by the NSRA

If the CPP receives any of the following:

- notification that an individual has been charged with a criminal offence; or
- notification that an individual is the subject of an investigation by the Police, Local Authority or any other authority relating to an offence; or
- the result of a CRB check containing entries which leads the CPP to conclude, on reasonable grounds, that an individual may be unsuitable to work with or have unsupervised access to children or young persons within the sport of shooting; or
- a recommendation from the NCPO; or
- any other evidence which causes the CPP reasonably to conclude that an individual may have committed an offence,

then it may:

- impose upon the individual an <u>immediate interim suspension</u> of any coaching or official's licence issued to the individual by the NSRA;
- impose upon the individual an <u>immediate interim suspension</u> of the involvement of the individual in any shooting event or shooting activity promoted or authorised by the NSRA, or by any body directly or indirectly affiliated to the NSRA, wherever that event or activity is being or is to be held;
- report the interim suspension to the NCPO of *BRITISH SHOOTING* and of any of its Member NGBs if it is known that that NGB has also issued a licence to the individual.

Factors to be taken into Account

In considering whether an immediate interim suspension should be imposed the CPP must take into account the following factors:

- the recommendation of the NCPO; and/or
- whether a child, children or young person(s) are or may be at risk; and/or
- whether the allegations are of a serious nature; and/or
- whether a suspension is necessary to allow the conduct of any investigation (by the NSRA or any other authority or body) to proceed unimpeded;
- whether such a suspension will be appropriate and proportionate in all the circumstances of the case.

Receipt of Information Initiating Disciplinary Proceedings by the NSRA

If the NSRA CPP receives any of the following:

- confirmation that the individual has been convicted of a criminal offence; or
- confirmation that the Local Authority or any other public authority has imposed any restrictions on the individual in respect of his/her future contact with children; or
- confirmation that on the basis of information supplied by the Police and/or Local Authority, the relevant local authority panel (LSCB) has "formed a view" that the individual is not suitable to work with children, or
- the result of a CRB check containing entries which clearly indicate that the individual is
 unsuitable to work with or have unsupervised access to children or young persons within the
 sport of shooting; or
- a report from the NCPO setting out any other evidence, which clearly indicates that the individual is unsuitable to work with or have unsupervised access to children or young persons within the sport of shooting,

then the CPP will invoke the relevant parts of the NSRA's disciplinary procedure.

Poor practice

When an incident has been reported, recorded and presented to the CPP via the NCPO, the panel will decide how to deal with the allegation and may conclude that the appropriate response is to initiate disciplinary proceedings.

If, on consideration, the allegation is clearly about poor practice, the CPP will deal with it as a misconduct issue, rather than as a disciplinary matter. This means that instead of imposing a penalty, the CPP will require the person concerned to take steps aimed at avoiding any future poor practice. Such steps might include, for instance, attendance on a suitable course or undertaking some other form of training, perhaps by working under the supervision of a more experienced person for a specified period.

Penalties that may be Imposed

If the result of the disciplinary procedure is a decision that the individual is unsuitable to work with, or have unsupervised access to children or young persons within the sport of shooting, then the CPP may impose upon the individual:

- a permanent suspension of any coaching or official's licence issued to the individual by the NSRA;
- a permanent ban on the individual taking part in any shooting event or shooting activity
 promoted or authorised by the NSRA, or by any body directly or indirectly affiliated to the
 NSRA, wherever that event or activity may be held.

Further Action that may be Taken

In addition to the interim measures and permanent penalties mentioned above, the NSRA shall notify the measures and penalties to the NCPO of *BRITISH SHOOTING* and of any of its Member NGBs to which the individual may belong or in whose activities the individual may participate.

Appeals

An individual who is disciplined and penalised under the above procedure will have a right of appeal to the NSRA Child Protection Appeal Panel against the decision(s) of the NSRA CPP.

If the individual states that he will appeal, the announcement of the penalty imposed as an interim measure, or after disciplinary proceedings, must be restricted to those who "need to know". This is so that if the appeal is successful, the individual is not prejudiced in future by widespread knowledge of the decision and penalty that have been overturned.

COMPLIANCE WITH NSRA CHILD PROTECTION PROCEDURES

Any individual who fails to comply with a specific requirement of the NSRA's Child Protection procedures may be suspended by the NSRA CPP until such time as he/she has complied with any outstanding matters. This step may be taken provided that the individual has been warned beforehand of the risk of such a suspension, and has failed to take the appropriate steps within a reasonable time.

Any individual penalised for non-compliance will have a right of appeal to the NSRA Child Protection Appeal Panel, as set out above.

ANNEX I Photography

Definition of "Photograph"

For these purposes "photograph" includes any photographic image:

- whether it is recorded on film or digitally, or for immediate transmission/broadcast, and
- consisting of either single/still images, or moving/video images, and
- taken with any sort of camera, including a webcam, a mobile telephone and even a satellite.

Events

When a shooting event is taking place any person wishing to take photographs must be accredited. Event organisers must set up an accreditation procedure, where anyone wishing to take photographs can be registered.

- **Professional photographers** wishing to record an event should seek accreditation with the event organiser by producing their professional identification for the details to be registered. Ideally they should request this at least five working days before the event, which will allow time for the organisers to check the credentials before giving authority.
- **Amateur photographers** wishing to record the event should seek accreditation with the event organiser by producing their club or registration card and a letter from their club confirming their reason for attending and photographing the event.
- **Spectators** wishing to take photographs should register their intent with the organiser beforehand.

Accreditation Procedure

The register should record the following information:

- the photographer's name and address
- the media company they are working for or retained by (if applicable)
- the photographic club they belong to (if applicable)
- their reason for taking photographs at the event (i.e. what will the images be used for)

A specimen application form is given in Annex II.

On registration, organisers of events should consider issuing an identification label for the day, which can serve to highlight those who have accreditation. Organisers must ensure that where they run regular events, the identifying label is changed each time to prevent unofficial replication.

Notices

The specific requirements concerning photography should, where possible, be published in event programmes, and notices should be put up prominently at the event, especially at the entrances. The recommended wording is:

In accordance with recommendations in the NATIONAL SMALL-BORE RIFLE ASSOCIATION's Child Protection Policy, the organisers of this event request that any person wishing to engage in any photography, video or filming should register their details with staff at the booking-in desk before carrying out any such photography. The organiser reserves the right to decline entry to the event, or to decline authority to take photographs, video or film.

In addition, a Policy Statement may be published and/or displayed; a specimen is given in Annex II.

Permission for Use of Photographs

If any photographs taken at a shooting event include images of children or vulnerable adults, and the photographer wishes to publish or exhibit any of them, the written consent of the child(ren) and/or vulnerable adult(s) should be obtained. A specimen Permission Form is given in Annex II.

Photography as a Coaching Aid

There is no intention to prevent coaches and teachers using photography as a coaching aid. However, coaches are advised to discuss the use of video or still photography with the shooters and their parents/carers. All parties should understand that this is part of the coaching process. Care should be taken to store such films where they will not fall into unauthorised hands.

If you have concerns

If you are concerned about any photography taking place at an event, contact the organisers and discuss it with them. If appropriate, the photographer about whom there are concerns should be asked to leave, and the facility managers should be informed.

Photographs on Websites

Many shooting organisations now have their own websites, and naturally wish to use photographs to promote their work and achievements. Where photographs include images of children, the key point is that <u>unless written permission has been given by the child and his/her parent</u>, it must not be possible to link a child's name to their image. This can be avoided by, for example:

- Using group photographs and giving names in a random order; i.e. not "from left to right".
- Using general or humorous captions that do not give names.

ANNEX II NSRA Specimen Documents

The specimen documents on the following pages are recommended examples to assist clubs and other organisations to meet the requirements of the NSRA's Policy.

Incident Record Form (2 pages)

For completion and submission to appropriate CPO(s) and NGB(s), to report on anything that gives rise to Concerns or Suspicions, or when there has been Disclosure or an Accusation.

Application for Authorisation to take Photographs or to Record Images Policy Statement Relating to the taking of Photographs or Recorded Images Permission Form for Use of Photographs or Recorded Images

All these are referred to in the section on Photography at Annex I.

NSRA Coaching Scheme Registration Form

NSRA Child Protection in Shooting

Incident Record Form

Details of person reporting incident				
Name:				
Appointment:				
Address:				
Child's details				
Name:	Date of birth:			
Race or Ethnic Origin:	Gender:			
Child's Address:				
Parents'/carers' address:				
Disability (if applicable):				
Details of person accused				
Name:	Age:			
Position in sport:	Relationship to Child:			
Address:				
Date and Time of Incident:				
What did you observe?				
What did the child say and what did you say to the child?				
What has been reported to you by others?				

Agencies Contacted

Police

Contact name and number:

Details of advice received:

Children's Social Care

Contact name and number:

Details of advice received:

Governing Body

Contact name and number:

Details of advice received:

Local Authority

Contact name and number:

Details of advice received:

Other (e.g. NSPCC)

Contact name and number:

Details of advice received:

Please send a copy of this report to all the agencies involved. Maintain strict confidentiality and do not discuss this incident with anyone other than those who are directly involved.

Signature:

Date:

Send copy to: NCPO, NSRA, Lord Roberts Centre, Bisley Camp, Brookwood, Woking, Surrey GU24 ONP

Application for Authority to Take Photographs or Record Images

Event details	
Event Title:	
Date:	Location:

Details of Person Taking Photographs or Recording Images

Name:

Media/Parent/Guardian:

Address:

Telephone number:

Purpose of Photography or Filming:

Declaration

I wish to take photographs or record images at this event. I agree to abide by the organisers' guidelines and I confirm that the photographs or recorded images will only be used for the stated, appropriate purpose.

Signed:

Date:

Please return the completed form to the event organiser or club official. You may be asked for proof of identity.

Policy Statement Relating to Photographs or Recorded Images

The	(organisation name)
recognises the need to ensure the welfare and safety As part of this commitment to ensure the safety of yo photographs, video or other images of young people consent of the parents/carers and the young person.	ung people we will not permit
The	(organisation name)
will follow the NSRA's guidance on the use of images	s of young people. (organisation name)
will take all reasonable steps to ensure that such ima for which they are intended, as declared on the Author Record Images.	
Signed:	Date:
Office held:	

Permission Form for the use of Photographs or Recorded Images

Event details	
Event Title:	
Date:	Location:
Purpose of Photography or Filming:	
Parent /Carer	
Ι	(parent/carer full name)
consent/do not consent to the photographing/v	ideoing and publication of images of:
	(young person full name)
under the NSRA's Child Protection guidelines,	and I am legally entitled to give this consent.
Signature:	Date:
Young Person	
	(full name)
consent/do not consent to the photographing/v involved in activities related to shooting.	ideoing and publication of images of me
Signature:	Date:

Clubs and Associations – please retain this document

NATIONAL SMALL-BORE RIFLE ASSOCIATION

Coaching Scheme Registration Form

	Coaching Scheme Reg	gistration Form	Date:
Title:	First Name(s):	Last Name:	
Address:			
Telephone:	Daytime:	Evenings:	
Fax:		Mobile:	
Email:			
Governing Bod	ly:	Membership No.:	
Club:			
County:		Region:	
Current coachi	ng/admin appointment (if any):		
Course to whic	h this registration applies:		
What discipline	e(s) do you intend to coach using this qualification	n?:	
What other qua work qualificati	alifications do you have that may be relevant? (Thions etc.):	hese could be coaching in	shooting, other sports,
	nded any GREAT BRITAIN TARGET SHOOTING g the last 2 years but not been assessed for the c		SH SHOOTING course
lf yes, state co	urse and modules		
Give brief deta	ils of your shooting experience:		
Give brief deta	ails of your coaching experience:		
Declaration			
	le by the NSRA code of conduct for coaches, and au check, the outcome of which may affect my in		subject to a Criminal

Signed:

Date:

ANNEX III CONTACTS & SOURCES OF FURTHER INFORMATION

NSRA

Lord Roberts Centre Bisley Camp Brookwood Woking Surrey GU24 ONP Tel.: 01483 485504 www.nsra.co.uk e-mail: ncpo@ nsra.co.uk

Criminal Records Bureau (CRB)

P.O. Box 91 Liverpool L69 2UH Tel.: 0870 9090811 www.crb.gov.uk

Sports Coach UK (SCUK)

114 Cardigan Road Headingley Leeds LS6 3BJ Tel.: 0113 274 4802 www.sportscoachuk.org e-mail: coaching@sportscoachuk.org

Child Protection in Sport Unit (CPSU)

England Unit 3 Gilmour Close Beaumont Leys Leicester L4 1EZ Tel: 0116 2347278 www.thecpsu.org.uk email: cpsu@nspcc.org.uk

Child Protection in Sport Unit Northern Ireland

NSPCC Jennymount Business Park North Derby Street Belfast BT15 3HN. Tel: 02890 351 135 www.thecpsu.org.uk email: cpsu@nspcc.org.uk

Child Protection in Sport Service Scotland

Children 1st Sussex House Kinning Park Glasgow G41 1DV Tel.: 0141 418 5674 www.childprotectioninsport.org.uk e-mail: cpinsport@children1st.org.uk

Child Protection in Sport Unit

Cymru/Wales NSPCC Cymru/Wales Capital Tower Greyfriars Road Cardiff CF10 3AG Tel: 029 20 267000 www.thecpsu.org.uk email: cpsuwales@nspcc.org.uk

The NSPCC National Centre

42 Curtain Road London EC2A 3NH Tel.: 020 7825 2500 Helpline: 0808 800 5000 www.nspcc.org.uk

Childline UK

(This is now operated by the NSPCC) Tel.: 020 7650 3200 Helpline: 0800 1111 www.childline.org.uk

NI Childline

(This is operated by the NSPCC) NSPCC Jennymount Business Park North Derby Street Belfast BT15 3HN. Helpline: 0800 1111 Tel.: 028 9035 7970

Childline Scotland

(This is operated by the NSPCC) Helpline: 0800 1111 www.children1st.org.uk e-mail: info@children1st.org.uk

Childline Cymru/Wales

(This is operated by the NSPCC) Freepost 1111 Swansea SA1 5ZZ Helpline: 0800 1111 Tel: 01792 480111

British Association of Counselling

BACP House 15 St. John's Business Park Lutterworth Leicestershire LE17 4HB Tel.: 0870 443 5252 www.bacp.co.uk

Every Child Matters

www.everychildmatters.gov.uk