

**PE1319/KKK**

**Scottish Schools Football Association Letter of 28 July 2016**

**Response to Scottish FA/Scottish Professional Football League Proposals – July 2016**

Please note that reference below is to the responses set out in red type in the letter from the above organisations to Scotland's Commissioner for Children & Young People.

The Scottish Schools' FA would also wish to place on record the fact that it was not invited to provide a representative to, nor take part in, the deliberations of the working group set up by the SFA and SPFL. This was disappointing.

**Recommendations 4-7**

The appointment of the Scottish FA's Child Protection and Safeguarding Manager is a welcome development. Not only does it bring particular knowledge and expertise to the organisation, it provides a valuable source of advice and reference for affiliated associations such as the Scottish Schools' FA.

The proposition of a standard pack for clubs is also to be welcomed as the need for consistency of approach between clubs has been a matter of concern for the Scottish Schools' FA for some time.

**Recommendation 8**

The introduction of the 28 day rule is also to be welcomed as it allows the player and his/her family more appropriate scope, especially in a circumstance in which the player is unhappy for football and/or social and emotional reasons. The SSFA would prefer to have sight of more detail on the conditions relating to a possible return to CAS before offering a view on that element of the recommendation.

The reference to reimbursement costs gives rise to continued concerns on the part of SSFA. The risks regarding a child being regarded as a commodity by a club, the implication that these children might be regarded as being owned by the club and the risk of such a payment being used to leverage a situation in which there is a difference of opinion all remain. The SSFA simply cannot understand why this form of neo-market needs to exist. Why can clubs simply not accept that they commit to a youth development programme and that programme has budgeted costs for the club, supported by the Scottish FA?

The one year commitment for the 10-14 year old group, along with the exceptional circumstances caveat, are welcomed – this should provide the child and family with more clarity.

**Recommendation 9**

The 15-17 year old registration period is an area that has caused SSFA some concern during its considerations of these issues in recent years.

The section in which the 'risk' of players being recruited by bigger and richer clubs in England expresses a concern that Scottish clubs have used to justify elements of protectionism that are not necessarily beneficial to children. The SSFA has been unable to ascertain exactly how many, or few, young people from Scotland that this may involve. One of the prime difficulties in making this assessment stems from the fact that there is much evidence that Club Academies in England recruit players from a very wide international base. That, of itself, gives rise to a range of other issues.

The concept of 'appropriate game time' requires some clarification before SSFA could formulate a more detailed response to this proposal. At present, the idea may indeed have merit but remains too nebulous. The right to walk away at the end of a season without appropriate game time is important, but the SSFA would prefer to have a built-in annual break point for the 15-17 year old group as it continues to harbour serious reservations about the three-year commitment. It is the Association's view that a two-year commitment, from 15-17 years of age would suffice as it encompasses the end of the period of statutory education.

As with recommendation 8, the Association is wholly supportive of the exceptional circumstances caveat with regard to a player's registration.

#### **Recommendation 10**

Given that the SSFA has argued long and hard for players within CAS to be allowed to play schools' football, this recommendation is warmly welcomed.

That stated, schools will undoubtedly look to a child's welfare as its first priority and may choose, in collaboration with the child's club, to find a programme of play and training that represents that child's best interests.

#### **Recommendations 12-13**

The introduction of a new 'complaints/mediation mechanism' is also welcomed. The SSFA would respectfully suggest that the child's school should be represented at any hearing of the new body so that a rounded picture of issues and circumstances is available to the body's considerations.