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ABSTRACT

In the UK responsibility for the public spend on community and youth sport is distributed through Sport England. The money received national is distributed at a sub-regional and then local through their County Sport Partnership (CSP) system In this way various sport participation programmes, such as Sportivate and Satellite Clubs, are overseen by the County Sports Partnerships (CSP). Whilst all CSPs work in partnership with the Child Protection in Sport Unit (CSPU) and will operate some form of service level agreement (including checks for insurance details and criminal record checks have been carried out for staffing), much of the work related to evaluations and safeguarding programmes is undertaken through self-reporting mechanisms. In light of this, Active Sussex (the Sussex CSP) sought to extend their quality assurance and welfare mechanisms by visiting a select number of their funded projects to check the robustness of various elements related to safeguarding. This paper presents the findings that resulted from over 30 site visits between April and July 2017. These findings suggest that the process of physically visiting some of the funded projects does, as expected, allow for a more thorough audit and proof of capability, but also that best practice, in terms of coaching and overseeing youth and participation projects, can be shared.

Keywords: Theories of Change; Sport governance; Community; Child protection; Coaching

INTRODUCTION

Sport and physical activities for young people have been identified as important for various physical, cognitive, social and developmental processes throughout academic and policy literature (1-2). Much of the rationale for investing in youth sport is based upon the idea that it can act as a mechanism to effect positive youth development (PYD) and community development (3-4). Youth development programmes then, are seen to be sites where young people can be supported and developed.

This is in terms of life skills, physical and social benefits, and the aspirational qualities that are deemed essential to creating good citizenship. In effect then, the principle of PYD sees children and young people as resources to be developed and not as problems to be managed (5-6). Investment in community matters through sport programmes takes on much of the same emphases, with perhaps most specifically the notion of contribution to community affairs taking precedence (7). Relating the positive elements of PYD and community matters to UK sport policy, the benefits of supporting and promoting youth and community sport has an established series of policy announcements (8-9), strategy papers (10-12), and academic literature (i.e. 13-18) underpinning it.

In brief, sport in the UK has been is consistently used by various governments to address a number of civic, community and non-sport objectives and benefits that can be found within the health, economic, and community development domains (19). These benefits are mirrored outside the UK in many other countries, with a wholesale commitment to public spending on youth sport outside of the field of compulsory physical education.

Sports Governance in the UK

As per other areas of government spending, in particular those within the context of young and vulnerable people, a regulatory role for the state has continued to develop. in the UK in relation to the protection of young people. This has been particularly so since the 1990's when sport organizations started to refer to the myriad elements relating to child welfare through the framework of 'safeguarding' (20).Currently, there are a number of regulatory frameworks that those involved within youth (and vulnerable adults) sport need to align with. These include, but are not exhaustive to, the Disclosure and Barring Service (DBS). The DBS is a mandatory check that collates information on previous criminal convictions and ensures that

those working with young and vulnerable people have no convictions, or the ones that they do have are 'spent' (i.e. since the time of conviction they had served a suitable period of rehabilitation/time). There are also a number of other legal frameworks, such as Health and Safety Acts and the Children's Act that those working in sport must adhere to. Moreover, there are nationally agreed guidelines in terms of coaches' codes of conduct (21-22). All told, present policy in the UK regarding safety in sport ensures that participation is supported by a number of legal requirements.

Much of the philosophy underpinning broader child protection in the UK is based upon the 2003 green paper Every Child Matters (23). This was published, alongside a formal report, in response to the death of Victoria Climbie, a young girl who suffered significant abuse and who was eventually killed by family members. The report found that there had been substantial breakdowns in communication between various and organizations, the reasons for this breakdown in communication were seen as a direct consequence of weak accountability and poor integration. The green paper outlined the future. essential measures necessarv to strengthen all preventative services (i.e. Education, Police, Social Services) by focusing on ensuring necessary intervention took place before any crisis points were reached in child safety. Following this report, the Government passed the Children Act 2004 and provided the ensure legislative framework to that organizations and people involved with young people had to focus on the needs of children.

However, despite these interventionary and regulatory frameworks there has been a succession of child abuse scandals emerging over recent time in the UK, with sport - in particular football - also suffering from repeated instances of historical abuse. The Offside Trust, a charity set up by survivors of abuse in sport for survivors of abuse in sport, reported that over eighty sports coaches had been convicted of abuse between 2016 and 2018. Whilst many of these convictions were for historical abuse, of note, nearly 50% of these cases were convictions given for abuse within the 2016-18 time period, reinforcing the necessity to ensure more robust reporting and safeguarding mechanisms (24).

Currently, organizations who seek public money from Sport England (the organization tasked

with overseeing community sport and increasing physical activity within England)1and UK Sport (the organization tasked with overseeing elite/Olympic level sport in the UK) must meet governance targets. These targets are outlined in both organizations' governance framework, A Code for Sports Governance (25). There are three tiers within this Code, all effectively based monetary various and time/plan on commitments. Fundamentally, the reason for the development of this Code was that both Sport England and UK Sport were tasked with developing governance guidelines so that the money they both receive from the government, effectively the public purse, could be protected. Accountability and transparency are also key to the nature of the Code, and this holds value and merit in terms of ensuring communication and integration can be at the forefront, all crucial elements of broader safeguarding philosophy.

Linked to a wider philosophy of governance and this Code itself, the role of the coach in sports projects to address wider social policy objectives such as civic engagement, health, educational attainment, crime prevention, and community development is considered paramount (26-27). Clearly, given the amount of responsibility that coaches take on in leading, at times, young and vulnerable people requires a number of checks and balances to ensure safeguarding is ensured. The next section outlines some of the ways in which community sport is delivered in the UK.

Community Sport Programmer Investment in the UK

As mentioned previously, the funding of sports projects continues to take place in the UK, even in the context of the current Government's series of cuts to public spending and commitment austerity (28-29).to The mechanisms for delivering community sport in the UK, in terms of funding, are based upon a combination of public, private, and voluntary donations. However, much of the overall spend comes through the Sport England system, one that distributes both public spend and the money they receive from the National Lottery system.

This money for community sport is cascaded through various mechanisms; the National Governing Bodies (NGB) system (most notably

¹Note -there are devolved home nations equivalents, sports Cortland, Sport Wales, and Sport Northern Ireland

46 of the 100+ sports that Sport England recognize), National Partners (such as the Child Protection in Sport Unit [CPSU], UK Coaching, and Street games), and their commitment to improving sporting opportunities for young people through a variety of sports programmes and schemes. Examples of these programmes and schemes include the Sportivate (6-8 week funded programmes aimed at those not participating regularly in sport) and Satellite Clubs (up to one year funding for sports clubs to set up hubs for additional activity and new clubs within schools) schemes, both of which are essential to the context of the present study. These schemes and projects are overseen through the County Sports Partnerships (CSP) network (with funding ending in 2018 and 2019 respectively). Whilst Sport England is a national organization, there are 45 CSPs that act as subregional hubs for them, and these offer advice, expertise, and oversee the smaller schemes and participation programmes like Sportivate and Satellite Clubs. In sum then, one of the main responsibilities of Sport England is to distribute community sport funds through the CSP mechanism. However, what is of note is that much of the work carried out through participation programmes, given their small scope and nature, is undertaken through selfreporting mechanisms.

The CSO Scheme

Here, given the background within which the present study operates, there is now value in detailing the Coach Support Officer (CSO) scheme that has been overseen through certain CSPs since 2013. For context, over the last 15 plus years in the UK there was a concerted effort to professionalize a number of industry and service sectors within the UK. This was in terms of their vocational approaches and conduct, for instance, in the care, leisure sector, and further education (30-33). This professionalization was mirrored in the coaching landscape, with a series of standardized coaching qualifications available for most NGBs through the United Kingdom Coaching Certificate (UKCC) model. This model was developed specifically to complement National Vocational Qualification (NVO) and National Occupational Standards (NOS) competency based criteria, and assures that NGB coaching awards are coherent, standardized, and calibrated at the same levels (34-35).

Alongside these qualifications, many NGBs (certainly those considered to be mainstream and in

receipt of high investment) also ask for evidence of continuous professional development (CPD) and also for their coaches to register on coach license schemes – which need to be recertified after time. In sum, sports coaches in the UK now need to evidence their professional practice through minimum qualifications and evidence of CPD.

The CSO scheme was developed specifically in response to a research project undertaken for Active Sussex (a southern UK CSP) by the author of the present study (36). The research project investigated the effectiveness of a coach bursary project, one that looked to support emerging, active participation coaches that Active Sussex had promoted over a two year period. The findings, derived from an inductive, qualitative research process that collated interviews with former recipients of the coach bursary, showed that they all believed that a coach mentoring strategy led by Active Sussex would be the best process by which to support a more effective local coaching workforce.

From this, six highly experienced coaches were recruited to the CSO roles to support Sportivate projects overseen by Active Sussex, and the CSO 'training' commenced in February 2013. Key points to recruitment and standardization were that they were 'practitioners', and that they were fluent in understanding the unique perspectives of youth and community sports coaching. The CSOs then undertook a wide mentoring scheme supporting the aforementioned Sportivate projects. At time of writing, the CSO scheme has 'evolved' over the last five years; first operating as Sport England programme support officers and data gatherers (2013-16), but also at different times: overseeing online Communities of Practice; supporting a talent foundation programme; and most recently, visiting Sportivate and Satellite Clubs projects to determine their wider impact, collect data, and ensure minimum standards of operation were present - in effect, mirroring the nature and philosophy of safe guarding. Whilst the CSO role had always had ensuring participant safety as a key principle, this extended nature of safeguarding principally took place in the summer of 2017. Here, the CSOs extended quality assurance and welfare mechanisms by visiting a select number of Active Sussex's funded projects. In total, over 30 site visits (out of approximately 200 projects for the entire year) were undertaken between April and July 2017 in a data collection/intervention project ostensibly looking to better understand the coaching workforce in Sussex, but also mindful of safeguarding and quality assurance.

The present study then is an evaluation of this 2017 Spring/Summer CSO data collection/intervention programme and will model the way in which sports governance policy can be developed through strategy implementation at local levels. The next section details the data collection process.

METHOD

The Strategic Relationship Manager and the School and the Community Sports Officer for Active Sussex oversaw the allocation of CSO site visits within the four month data collection/intervention period. Many of these site visits were chosen by the CSOs themselves, and a number were also visited by the Strategic Relationship Manager and the School and Community Sports Officer. Some of the site visits were undertaken on a pragmatic basis, with, on occasion, two to three site visits completed in one day meaning that (in the context of the area within which they had to cover, 3,784 km²), some would be close to each other (considered to be a driving distance of less than two hours). Once the allocation of site visits was complete, each of the chosen individual projects' organizers were told that they would be visited as part of their service level agreements (SLA, a condition of being allocated funding). From this, a selection of dates and times for each particular site visit were outlined. Given that each of the projects

had a particular 'lifespan', these dates and times were generally kept within a time period of four working weeks within which they could be visited at any time. Once closer to these times, the CSOs, the Strategic Relationship Manager, and the School and Community Sports Officer would confirm a date (typically two to three days before the visit) and explain the nature of the visit (data collection) to whoever would be delivering the sessions.

It is important to note two things here. First, that the information relating to the nature of the visit given was limited to the idea of data collection and minimum standards, and second, that the visit was compulsory.

In total, 30 site visits were undertaken out of an approximate 65 that were delivered within the four month data collection/intervention time frame (approximate because time periods for projects were fluid, with some necessarily 'overlapping' quarter yearly monitoring periods for various reasons). Of note, 12 of the site visits were observed by the author of the present study. In terms of the data collection/interventions, outside of observations, formative feedback, and briefing with the leads and sports coaches on the projects, the CSOs used a checklist and a series of questions to determine whether minimum standards for the sessions and projects were being met. These questions were the following:

Has the Public Liability Insurance document been seen? Is there a safeguarding policy and has it been seen? If a safeguarding issue occurs, who are these incidents reported to? Has a risk assessment been undertaken? Is there a point of contact for First Aid? Do any of the participants have a medical condition and how did/do they find this out? Was a register taken?

Figure 1. Data collection/interventions, Children and Young People - Project Check list.

The data collection for the present study and subsequent analysis was undertaken through the following two methods. Firstly, field notes from the 12 site visits undertaken by the author were

collated. After each of these data collection phases (site visits), the field notes were transcribed, coded and analysed (37-38). Secondly, at the end of the four month CSO data

collection/intervention project period, the overall results the Strategic Relationship Manager and the School and Community Sports Officer collated the preliminary results by October 2017.

These results, and the issues surrounding them, were outlined and discussed in two interviews (two x one hour) that the author of the present study undertook with the Strategic Relationship Manager and School and Community Sports Officer in December 2017.

Here, the data collection/intervention project's scope, usefulness, and impact were reflected upon, and recommendations for the future were given. The results of the observations and the final, post intervention interviews are presented next.

RESULTS

Field Notes: The Potential Impact on Professional Working Practices

The following extracts from the observations undertaken by the author outline the manner in which the coaches at some of the projects chosen as part of the data collection/intervention project were seen to operate:

Field Notes 1

"Some of the kids really seem like they're enjoying themselves. There's a few that might need some extra attention, but the coach quickly realises this and makes sure that they cater for them too."

Field Notes 3

"They certainly seem comfortable enough with the questions we have. No problems at all in terms of knowing where things are and what to do.

Field Notes 4

"Lots of positive stuff, actually an exploratory type coaching that allows the participants to learn, but also quite crucially at a fun pace and one that allows them all to be involved"

Field Notes 7

"Natural coach, lots of appropriate activities for young people and pitched at an excellent level. No wonder they keep coming back."

Field Notes 10

"Certainly an interesting session in that there was a real need for inclusivity given the participant profiles. Coach was kind, considerate, and really relaxed with the participants which were really good to see."

All told, the coaches who were observed demonstrated particular characteristics that mirror those considered excellent coaching practice for the youth and participation domains (39). More specifically, the notions of fun, enjoyment and inclusivity seemed to be of utmost importance to the coaches. Additionally, the coaches observed were all at ease with the questions on the data collection/intervention project checklist, demonstrating familiarity and knowledge of all the areas related to safeguarding.

Post Intervention Interviews

The principle of safeguarding was preeminent throughout both sets of interviews. Specifically, the Strategic Relationship Manager and the School and Community Sports Officer claimed that the real success of the 2017 summer data collection/intervention project was that it encouraged more ownership. This was particularly so in terms of matters related to safeguarding for those projects in receipt of Sport England funding, as well as the actual coaches delivering projects. This was in much part due to the manner in which accountability could be defined and tracked through the lens of the visiting CSOs and the data framework. collection/intervention the In beginning of the first interview, the Strategic Relationship Manager and the School and the Community Sports Officer were asked how they saw the success of the interventions: The Strategic Relationship Manager eagerly replied:

"Safeguarding and ensuring quality. How successful has this been? Well, the issue is always how you can match up what you are doing with what you actually hope they can do. Obviously, we have service level agreements (SLA), but anything we might find out with these CSO type visits could flag anything up, and we can actually ask the question in real time/life"

The School and Community Sports Officer added that more recently, in an attempt to "try and do something productive in the coaching world" after the coach abuse scandals in the UK, they came up with the idea of furthering the responsibility for checking codes of conduct at a local level:

"With a lot of the things that happened earlier in the year, football and stuff, we want do a lot

more. Yes, we have a safeguarding plan anyhow, and yes we have to achieve that as part of Sport England funding, and yes Sport England sent a reminder to us to check. But, we wanted to be really, really sure of things"

This approach, one that saw an extension of the Sport England reminder to "check" on projects, was considered invaluable. Furthermore, he explained that he and the Strategic Relationship Manager were hoping to develop something that could act as an example for other coaching and sports providers to follow. It was hoped, indeed assumed, that their data collection/intervention project could demonstrate that an appropriate approach, one that had taken into consideration the fact that "all avenues should be explored" and "no stone left unturned" in terms of showing their efforts to safeguard, could be replicated elsewhere. Linked to their philosophies on safeguarding, the discussion moved to their perceptions of what it really meant to implement the data collection/intervention project. The Strategic Relationship Manager explained:

"It's certainly a sense of frustration with everything that has gone on recently (scandals). Of course, anyone can think there're doing all they really can. I suppose even we could sit and say that everything is alright, but we've gone a lot further now. We're in good conscience saying that we've also actually been out and seen it (projects), checked it (projects), and placed those completing projects under scrutiny. We know that this is important and it does give us some sense of satisfaction"

The School and Community Sports Officer explained further:

"You take their word on that, but for example, a school has their own method of checking DBS etc., but at times with others, some weren't quite so sure...As far as we know, it was all fine on the safeguarding front. Which we expected to be honest with all of the paperwork. But we've asked the questions. And now we can say we did something, in reality we may never really know the intricacies of every project...but we know we tried."

For the Strategic Relationship Manager, this was one of the main reasons for developing and overseeing the data collection/intervention project. He, like the School and Community Sports Officer, understood that clubs and that in receipt of the Sportivate or Satellite Clubs funding "needed to sign the SLAs and adhere to them". Yet this was largely exclusive in that it remained a series of written only agreements. However, the prospect of being able to physically visit the funded projects to see how they operated was an opportunity that he looked forward to:

"At the very least, when we visit these different places we can ask questions. Like, what happens if someone is ill? What happens if someone can't turn up? Who do you scale up any concerns to? How about this or how about that? The reality is whilst we can and do sample SLA's, no one can be 100% certain of what is really going on at ground level. But with the system we've just now used we can physically check...It's like club mark,2 we can ask questions...what happens if? It is really a sound method of quality assurance..."

And the School and Community Sports Officer echoed these sentiments, and also explained the benefits of having institutions or organisations that already had their own safeguarding in place: "With Sport England and Satellite clubs they had already had SLA and many are on school sites...so this does make the safeguarding policies 'easier''. So it's like, right, actually we went out and the majority of school sites knew where the first aider was they knew there were processes in place, they would speak to someone in school.

Generally these kind of school visits were easy enough, oftentimes they'd have teachers or lecturers helping out or taking the sessions, and these people are professionals that are familiar with safeguarding" Other than the way in which the Strategic Relationship Manager and the School and Community Sports Officer explicitly outlining what they saw as the philosophy and, to an extent, the impact of the data collection/intervention project, their discussions also centred on the effectiveness of the coaches on the funded projects.

In short, before the data collection/intervention project had started they had asked themselves: what really happens on the funded projects? the coaches competent Were and knowledgeable? And how might the coaches themselves be helped? The Strategic Relationship Manager gave his thoughts on the matter:

²Clubmark is an accreditation process for sports clubs.

"We had a lot of luck with the coaches that we saw. In all honesty, they were pretty much all at the very least good and a lot of times really excellent. Is that luck? Perhaps, but there's also the fact that we're always developing relationships with our coaching workforce in the area. And, if we're being honest, there might be a little bit of extra pressure that our site visits can bring out in the coaches. From talking to some of them, they were happy that they could get some support and that at times someone might be along to visit them"

The School and Community Sports Officer expanded on this matter, further explaining that the data collection project/intervention project offered a perfect opportunity to also disseminate good practice:

"When we're there, we can ask whether the coaches are aware of all the areas we have on the reporting forms. It's something we can also encourage through our SLA agreements, and we also end up in a bit of an ongoing conversation with our providers. They can easily pass on this information and our expectations to the coaches who deliver their sessions and those coaches can also work with other coaches and share their best practice. We can all let each other know that we're looking after each other, and looking after our participants"

DISCUSSION

Whilst it is intended for the data in the present study to sit in isolation from the discussion section, the aim here is to model the impact of the data collection/intervention project through a Theories of Change (ToC) framework. In doing so, some additional data will be included in this discussion section to reinforce some of the results that were outlined in the last section. This is due to the evaluative nature of the present study and the acknowledgement that it has, in large part, been based upon the experiences and recollections of just two key individuals.

Whilst we can model the impact of the new code for sports governance on sport policy and development through policy implementation at local levels, for instance, through the demands and support that underpin policy change and the resultant decisions and actions taken as a consequence (40), the findings in the present study are reflective of more than outside demands and pressures (i.e. governmental policy). Instead, they also heavily reflect the personal choice and philosophy of the two key individuals involved in the creation and delivery of the data collection/intervention project. Here then, a ToC approach allows a wider understanding and articulation of what happened.

In the main, ToC frameworks look to model an organisation's planning route and pathways (41). Perhaps principally operating as evaluative tools, the key characteristic that separates the model and application of ToC from more basic evaluative frameworks is that they allow the change processes to be more transparently operated. This is by explicitly recognising, accepting, and then outlining any assumptions that underpin the intended outcomes of any plan or project. Policymakers and practitioners, in this regard, can have a tool that can clearly articulate the reasons for implementing policy and any required, or intended, change or aims (42-43).

Helpfully, there is an established body of work related to ToC within the UK Sport Development sector, with the Sport for Development Coalition (a movement that comprises many of the sport development agencies within the UK and Ireland), Sported (One of the leading Sport for Development charities in the UK, and part of the Sport for Development Coalition), and The National Alliance of Sport for the Desistance of Crime (NASDC, an organisation that supports the use of sport in tackling crime that has support from the Ministry of Justice, the National Offender Management Service, and Comic Relief) demonstrating evidence of engagement with the frame work. Similarly, the UK has other, older, schemes such as the Health Action Zones in the 1990's that ostensibly used ToC models (42-43). All told, ToC has been used successfully as an evaluative tool by organisers of various sport and social policy programmes over a prolonged time period.

Yet we can build upon and indeed extend the manner in which ToC can be used for the present study. Typically, the approach to planning, delivery, participation and evaluation within ToC has been seen as two models: one that is developed before implementation, and the other retrospectively (44). In the case of the present study, whilst acknowledging that the data collection/intervention project was not developed with ToC specifically in mind, using

a 'reverse chain 'method of planning from the desired outcomes, i.e. doing what is necessary to ensure safeguarding, demonstrated success. Put simply, the intentions to improve safeguarding, the fundamental purpose of the data collection/intervention project, allowed the creation of a system that facilitated how it could best be determined and measured. So by applying this version of ToC in this 'project'. the end result of 'ensuring' equity and safeguarding were clearly evident. However, the retrospective version of ToC also allows, in this instance, a move beyond the immediate evolution of what happened.

Here, it can also work as a 'process' of changing the project for the 'next time', and generate different variations that can assist in the construction of future projects. To illustrate this, the School and Community Sports Officer explained how "future versions of what we do will make sure that all coaches and projects know what we want, how we might learn from each other, and how best to share information".

Yet, despite the significance of this, it is worth noting that the consequences of the data collection/intervention project were not limited to after the time period in which it operated. Specifically, the project also allowed change to occur within it, i.e. through the actual lifecycle of this summer 2017 project.

An example here can be seen by the Strategic Relationship Manager explaining that the course of action for site visits changed midway, by "pre-empting visits with a list of questions we expect to be answered".

This reflects how both the Strategic Manager and School Relationship and Community Sports Officer, and, to a lesser extent, the CSOs involved in the site vests, facilitate a change, a change that was ongoing and subject to an interface between live 'reporting' and subsequent evaluations.

CONCLUSION

The present study highlights how a data collection/intervention project was considered to assist safeguarding within Sport England funded projects. Additionally, the evaluation of the project demonstrated how the project operated in flux, with key reinterpretations of specific actions and guidelines (such as pre-empting the site visits with questions) related to overseeing the funded projects taking place.

The key participants in the study, the Strategic Relationship Manager and the School and Community Sports Officer, were both well aware of the necessity to implement change within the way that local's port governance operates, and their personal philosophies mandated a course of action that put the principle of safeguarding at the heart of their data collection/intervention project.

The findings of the present study then, point to the way that developing new methods of evaluation in response to emerging 'safeguarding' and sports governance requirements requires onsite support and contextualization, and development and understanding through consistent evaluation. The findings also show how formalized quality assurance programmers can demonstrate that robust processes are in place, not just for finance, but for equality, safeguarding, and governance. And finally, the findings strongly suggest that the importance of safeguarding for sports coaches is imperative, but must also be understood in the context of the importance of critically engaging with schemes that ensure the welfare of youth and vulnerable adults.

Despite offering the above new insights, a number of issues related to the limitations of the present study remain.

First, it is necessary to recognize that it is just one case study, with the perceptions and beliefs of the two key research participants given precedence.

Second, that it must be acknowledged that the research itself is less a theoretical critique and more a practical analysis. In essence then, this is a story and report in many respects, and despite operating in the context of ToC, it still functions in a more evaluative sense.

However, a number of possibilities for expanding the footprint and scope of the scheme remain given that there is a wider (in the context of England) potential onsite support. This is because there is an established workforce that can replicate the working of the CSP in this project. As of late 2017, 12 CSPs (out of the nationwide 45) had implemented similar schemes to the Active Sussex CSO system to support various coaching projects. It is not unreasonable to suggest then that these additional CSOs could have their role and scope developed to mirror that of those in this study, one that encompasses a more direct, concerted effort to ensure safeguarding.

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