



# PHOENIX SPORTS CLUB

## Digital and Online Safety (Social Media) Policy

1. This policy will:
  - a. Set out Phoenix Sports Club's digital and online responsibilities.
  - b. Set out how Phoenix Sports Club will manage the safe and appropriate use of photography and video photography devices and their use.
  - c. Set out how Phoenix Sports Club will seek to prevent instances of poor practice and abuse, within its online and digital presence.
2. It is drafted in line with FA Guidance and relevant legislation.
3. It will be subject to amendments, removals, and additions as agreed upon by the Club Committee, except on matters reserved to the Board who will in such cases hold jurisdiction.
4. It has been absorbed into Club policy and dictates the Club's approach to digital and online safety. It is to be used in conjunction with the Club's wider safeguarding policies and procedures.
5. It cannot supersede any aspect of the Club's safeguarding policies or statute or instrument binding on the Club and should only be used in conjunction with said policies and legislation.
6. This policy was reviewed on 26<sup>th</sup> June 2024, and is binding in respect of the 2024/2025 season onwards.

Written by:  
Warren Strong, Club Welfare Officer

## Section 1 – Reader guidance

1. This policy should be interpreted and applied in conjunction with the Club's wider policies on safeguarding, including;
  - a. Code of Conduct;
  - b. Anti-Bullying Policy;
  - c. Safeguarding Children Policy;
  - d. Whistleblowing Policy;
  - e. Safeguarding Vulnerable Adults Policy, where appropriate.
  - f. Safer Recruitment of Volunteers (Youth Section) Policy.
2. Definitions:
  - a. A **child** is a person under the age of eighteen<sup>1</sup>;
    - i. this is applicable to the plural of **children**;
      1. and **young person**.
  - b. **Social media** includes, but is not limited to:
    - i. Facebook;
    - ii. X (formerly and commonly known as Twitter);
    - iii. Instagram;
    - iv. WhatsApp;
    - v. LinkedIn.
  - c. Official Club **websites** and **social media platforms [platforms]** include:
    - i. <https://www.phoenixsportsclub.co.uk>;
    - ii. <https://phoenixsportsclub.clubforce.com>;
    - iii. <https://www.facebook.com/phoenixsports82>;
    - iv. <https://x.com/phoenixsport82>;
    - v. [https://www.instagram.com/phoenix\\_sports\\_club82/](https://www.instagram.com/phoenix_sports_club82/);

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<sup>1</sup> Children Act 1989.

vi. The Club utilises WhatsApp for easy group communications at all levels of the Club.

d. Ordinary definitions should always be applied to this policy.

## Section 2 – Policy statement

3. Phoenix Sports Club [“We” and “Club”] acknowledges its responsibility to safeguard the welfare of every child and young person who has been entrusted to its care, both digitally and in-person.
4. Phoenix Sports Club is committed to working to provide a safe environment for all members.
5. Phoenix Sports Club subscribe to The Football Association’s Safeguarding Children Policy and Procedures;
  - a. Phoenix Sports Club endorses and accepts the Policy Statement contained in that document.
6. We believe that every child has the right to protection from the abuse and exploitation.
7. Safeguarding and protection of all children is everyone’s responsibility.
8. Phoenix Sports Club believes that it is always unacceptable for any child to experience abuse of any kind and recognises its responsibility to safeguard and protect the welfare of all children.
9. By adhering to our safeguarding policies, procedures and processes we will do everything possible to safeguard children at our club.
10. Phoenix Sports Club recognises the risks associated with the internet and social media, particularly when used by children and vulnerable adults.

## Section 3 – Running websites and social media platforms

11. The following section sets out how the way in which the Club must operate its websites and social media platforms to effectively meet its safeguarding responsibilities.
12. It aims to ensure children, young people, vulnerable adults, coaches, referees and adults in a position of trust are not subjected to improper online behaviour or improper allegations.
13. Phoenix Sports Club recognises and accepts that it is responsible for ensuring all content hosted on our websites, social network areas and any associated message boards or blogs abide by the Rules and Regulations of The Football Association.

14. It is against FA rules to post comments that are or may be perceived as:

- a. offensive;
- b. insulting;
- c. abusive;
- d. threatening;
- e. racist;
- f. discriminatory;
- g. any other reference that may cause offence or harm to others.
  - i. Any such comment made on Club websites or platforms regarding match officials can result in disciplinary action being taken in line with The Football Association's disciplinary policies and procedures.

15. Comments made on websites that are threatening, abusive or racist could lead to legal action being taken against both those responsible for posting them and those responsible for hosting them;

- a. Comments may attract libel claims and legal action through the civil courts if they are untrue or defamatory.

16. Children and young people should be advised by their coaches, parents or carers, and Club Welfare Officer to always tell an adult they trust about communications that make them feel uncomfortable or where they've been asked not to tell their parent or carer about the communication.

17. The Club must:

- a. Appoint an appropriate adult(s) to monitor the content of the website;
  - i. The individual should complete the FA Safeguarding Children course in order to effectively carry out this role.
- b. Ensure everyone within the Club knows who is responsible for monitoring the content of the website and social media, and how to contact them;
- c. Apply the FA's Photography guidelines<sup>2</sup>;
- d. Place the CEOP 'Report Abuse' app on the website and link the advice offered via its [ThinkUKnow.co.uk](https://www.thinkuknow.co.uk);

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<sup>2</sup> The Football Association Guidance Notes 8.3: Photographing and Filming Children.

- i. This gives age appropriate advice to children and parents/carers.
  - e. Remember that it is responsible for all content contained on its website and social media;
  - f. Regularly monitor the content and use the FA's Respect Codes of Conduct and Relationships of Trust Statement as a guides to acceptable behaviour online;
18. The Club must not:
- a. Host children's or young people's details where they can be seen or used by others to contact them;
    - i. This includes coaches or referees under the age of 18.
  - b. Host pictures of children without the express written permission of parents/carers;
  - c. Post details of individuals which may lead to them being identified;
  - d. Post or host items which may be considered to be hurtful, insulting, offensive, abusive or threatening, or might incite such behaviour in others;
  - e. Post or host match results for teams that are under 11.

#### Section 4 – Photography, videography and the uses of imagery

19. Implicit within the Club policies and procedures for the protection of Children is the commitment to ensure that all publications and media represent participants appropriately and with due respect. It is not the intention of the Club to prevent parents from taking pictures of their children, but rather to ensure that photographic practices are carefully managed and effective prevention measures in place to deter anyone with undesirable intentions from taking and publishing inappropriate images.
20. Phoenix Sports Club, our parents, carers and children generally look forward to celebrating and or publicising footballing successes by photographing children at matches and events. Documenting a child's involvement and progress through the season both by film and photos is widely accepted as contributing to the enjoyment of the game.
21. It's also recognised some coaches find it helpful to use photographs or film as a coaching tool to support a player's development.
22. It is recognised that the use of photos and film on websites, social media, posters, within the press or other publications, can pose direct and indirect risks to children if they are not managed appropriately.
23. However, the taking of appropriate images of children is supported by Phoenix

Sports Club.

24. Everyone wishing to film or take photos in football has a responsibility to familiarise themselves with and adhere to the following guidance.

25. Potential risks of the inappropriate taking and or use of images of children:

- a. Someone may set out to take inappropriate photos or film content in ways that are potentially illegal and harmful, such as:
- b. Children changing;
- c. Photos taken in the toilet;
- d. Using a camera at ground level to photograph up girls' skirts;
- e. Images that appear ambiguous can be used inappropriately and out of context by others;
- f. Images that can easily be copied and edited, perhaps to create child-abuse images;
- g. Images shared privately online that can be re-shared, possibly entering the public domain on websites or social media;
  - i. Further information is available online<sup>3</sup>.
- h. When a child's image is accompanied by significant personal information, such as their full name, it makes them more easily identifiable to third parties. This can lead, and has led, to:
  - i. children being located;
  - ii. contacted;
  - iii. groomed.
- i. Even if personal details are kept confidential, details identifying the school or club, or their favourite sportsperson or team, can potentially be used to groom the child.

26. There's an increased risk of identification of, and contact with a child:

- a. By someone in circumstances where there are legal restrictions, such as if the child is in local-authority care or placed with an adoptive family;
- b. Where restrictions on contact with one parent following a parental separation exist;

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<sup>3</sup> The Football Association Safeguarding in the Digital World, Section 6.

- c. In situations where a child may be a witness in criminal proceedings.

#### Section 4.1 Commissioning official or professional photographers and the local media

27. If the Club commissioning professional photographers or inviting the media to cover a football activity, ensure the Club and they are clear about each other's expectations.

- a. The key is to plan ahead and communicate early on.

28. The below steps must be followed:

- a. Provide a clear brief about what is considered appropriate in terms of content and behaviour;
- b. Inform them of the Club's commitment to safeguarding children;
- c. Establish who will hold the recorded images and for how long they'll be retained and/or used and what they intend to do with them, such as:
  - i. place on a website for sale;
  - ii. distribute thumb nails to the club to co-ordinate sales.
- d. Issue the professional photographer with identification, which must be worn at all times;
- e. Clarify areas where all photography is prohibited:
  - i. toilets;
  - ii. changing areas;
  - iii. first-aid areas.
- f. Inform the photographer about how to identify and avoid taking images of children without the required parental consent for photography;
- g. Don't allow unsupervised access to children or one-to-one photo sessions at events;
- h. Don't allow photo sessions away from the event – for instance, at a young person's home;
- i. Inform participants and parents or carers prior to the event that a professional photographer will be in attendance.

#### Section 4.1.2 What to do when parental consent is not given

29. The Club / event organiser has a responsibility to put in place arrangements to ensure that any official or professional photographers can identify (or be informed about) which children should not be subject to close-up photography.
- a. This could involve providing some type of recognisable badge, sticker or wristband, and/or a system for photographers to check with the activity organiser and/or team manager to ensure its clear which groups or individuals should not feature in images.
30. It is good practise for Parents / Carers / Guardian of children who are not to be photographed to remind the team coach of this, especially if the Team are playing at tournaments where there is likely to be many Teams in attendance.

#### Section 4.2 Additional considerations

31. Share this guidance on taking images with everyone who becomes a club member.
32. Ensure the club has written parental consent to use a player's image in the public domain e.g. on the club website, Facebook page or in a newspaper article.
- a. This is essential in relation to paragraph 33.
33. Ensure that any child in your club who is under care proceedings where there are legal restrictions, is protected by ensuring their image is not placed in the public domain. This can be done by using The FA's Club Annual Membership Information and Consent Form<sup>4</sup>.
34. Ensure all those featured are appropriately dressed;
- a. a minimum of vest or shirt and shorts.
35. Aim to take pictures which represent the broad range of youngsters participating safely in football, such as:
- a. boys and girls;
  - b. disabled people;
  - c. ethnic minority communities.
36. Advise parents/carers and spectators that there can be negative consequences to sharing images linked to information about their own or other people's children on social media and that care should be taken when 'tagging'.
37. Establish procedures to respond to and manage any concerns, including clear reporting structures and a system to contact the Police when necessary.

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<sup>4</sup> The Football Association Guidance Notes 8.2.



38. Do not:

- a. publish photographs with the full name(s) of the individual(s) featured unless you have written consent to do so, and you have informed the parents/ carers as to how the image will be used.
- b. use player profiles with pictures and detailed personal information online.
- c. use an image for something other than that which it was initially agreed.
- d. allow images to be recorded in changing rooms, showers, or toilets;
  - i. this includes the use of mobile phones that record images.
- e. include any advertising relating to alcohol or gambling in photographs of children.

39. It is not an offence to take appropriate photographs in a public place even if asked not to do so.

40. No-one has the right to decide who can and cannot take images on public land.

41. If you have serious concerns about a possible child protection issue relating to the recording of images then call the Police.

- a. This action should only be taken where you believe that someone may be acting unlawfully or putting a child at risk.

42. The land or facility owner can decide whether photography and or filming at football activities will be permitted when carried out on private land.

- a. This needs to make this known before allowing individuals access to the private property.
- b. If they do not comply then it can be requested for them to leave.

43. Swimming as a social activity for football clubs presents a higher risk for potential misuse than football, so images should:

- a. Focus on the activity rather than a particular child;
- b. Avoid showing the full face and body of a child and instead show children in the water, or from the waist or shoulders up;
- c. Avoid images and camera angles that may be more prone to misinterpretation or misuse than others.

### Section 4.3 Filming as a coaching aid

44. The FA advises that coaches using filming as a legitimate coaching aid should make parents/carers and players aware that this will be part of the coaching programme.
45. Care should be taken when storing the film clips.
46. Parental consent must have been given.

### Section 4.4 General images of events

47. At many events, organisers will wish to take wide-angle, more general images of the event, the site, opening and closing ceremonies, and so on.
  - a. It's usually not reasonable, practical, or proportionate to secure consent for every participating child in order to take such images, or to preclude such photography on the basis of the concerns of a small number of parents.
  - b. In these circumstances, organisers should make clear to all participants and parents that these kinds of images will be taken, and for what purposes.
48. Good practise would be to ensure that any advertising, tickets or social media promoting an event state that general photography may be used.

### Section 4.4 Secure storage of images

49. Images of film recordings of children must be kept securely:
  - a. Hard copies of images should be kept in a locked drawer.
  - b. Electronic images should be in a protected folder with restricted access.
  - c. Images should not be stored on unencrypted portable equipment such as laptops, memory sticks or mobile phones.

### Section 4.5 Misuse and manipulation of images

50. An individual with bad intent may deliberately target a vulnerable child to take images which may be uploaded to social media or shared with other likeminded individuals or groups motivated by sexual interest.
51. Occasionally, these images are also used to threaten and force the child into unwanted, illegal sexual activity.
52. Taking and sharing images like this may form part of wider bullying of the targeted young person by other young people, motivated more by a wish to cause humiliation and embarrassment.
53. Even in the context of a shared joke among friends, without abusive intent, a

young person taking and sharing inappropriate images may be committing a serious offence and risk criminal prosecution.

#### Section 4.6 Responding to concerns

54. Whether it's general club activities or when attending an event all club officials, volunteers, children and parents/carers should be informed that if they have any concerns regarding inappropriate or intrusive photography (in terms of the way, by whom, or where photography is being undertaken), these should be reported. Reports can be made to the:

- a. Event organiser or another official;
- b. Club Welfare Officer;
- c. County FA Designated Safeguarding Officer;
- d. National League DSO;
- e. The FA Safeguarding Team via [safeguarding@TheFA.com](mailto:safeguarding@TheFA.com).

55. There must be a safeguarding procedure in place to ensure that reported concerns are dealt with in the same way as any other child-protection issue. Concerns about professional photographers should also be reported to their employers.

56. To report potentially unlawful materials on the internet contact The Internet Watch Foundation via [report@iwf.org.uk](mailto:report@iwf.org.uk).

#### Section 5 – Useful contacts

57. Designated Safeguarding Lead (Board):

- a. Warren Strong
- b. [warren.phoenixsports@outlook.com](mailto:warren.phoenixsports@outlook.com)
- c. 07532 697 492

58. Club Welfare Officer (Adult and Youth)

- a. Warren Strong
- b. [warren.phoenixsports@outlook.com](mailto:warren.phoenixsports@outlook.com)
- c. 07532 697 492

59. If at any time you are not able to contact the Club Welfare Officer, or the matter is clearly serious, then you can contact your County FA Welfare Officer directly:

- d. Kent County Football Association
- e. Designated Safeguarding Officer: Lucy Kidd
- f. [safeguarding@kentFA.com](mailto:safeguarding@kentFA.com)
- g. 01622 792 140 (9am to 5pm, Monday to Friday)

60. You can also contact the National League Designated Safeguarding Officer, for matters concerning Phoenix Sports Club First Team, playing in the Pitching In Isthmian League (South East):

- h. Martyn Cannon
- i. [safeguarding@thenationalleague.org.uk](mailto:safeguarding@thenationalleague.org.uk)
- j. 01217 142 207

61. The FA Safeguarding Team

- k. [safeguarding@theFA.com](mailto:safeguarding@theFA.com)
- l. 0900 169 1862

62. Bexley Children's Services (commonly known as Social Services)

- m. 020 3045 5440 (Monday to Friday, 09:00 to 17:00)
  - i. 020 8303 7777 or 020 8303 7171 outside of these hours.
- n. Civic Offices,  
2 Watling Street,  
Bexleyheath  
Kent  
DA6 7AT