

Dundee Dragons Wheelchair Sports Club SCIO

Online Safety, Digital Communication & Social Media Policy and Code of Conduct

Ver 2. August 2026. For Review August 2029.

1. Purpose & Legal Framework

Dundee Dragons Wheelchair Sports Club SCIO (DDWSC) is committed to providing a safe, inclusive, and encouraging environment across both physical and digital spaces. This policy outlines acceptable digital conduct, establishes mandatory standards for online communications, and safeguards all participants, with specific protections for children and young people (under 18) and adults at risk.

This policy is designed to support compliance with applicable Scots Law, UK legislation, and relevant data protection standards, including:

- Child Protection & Safeguarding (Scotland): National Guidance for Child Protection in Scotland (2021), Children and Young People (Scotland) Act 2014, and, where applicable to public functions, the United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024.
- Protection of Vulnerable Groups: Protection of Vulnerable Groups (Scotland) Act 2007 (PVG Scheme) and the Adult Support and Protection (Scotland) Act 2007.
- Data Protection & Privacy: UK GDPR, Data Protection Act 2018, and, where relevant to cross-border processing, EU GDPR principles.
- Online Safety & Conduct: Online Safety Act 2023 (as it applies to the platforms and services used by the club), Sexual Offences (Scotland) Act 2009, and national governing body guidelines (e.g. sportscotland, Scottish Disability Sport, British Cycling).

This policy works alongside the DDWSC Safeguarding & Child Protection Policy, Code of Conduct, Anti-Bullying Policy, and Data Protection/Privacy Notice.

2. Scope & Principles

This policy applies to all DDWSC committee members, staff, coaches, ride leaders, volunteers, members, parents/guardians, and participants.

Core Principles:

- The club will apply the same safeguarding standards online as offline.
- All children (under 18) and adults at risk have the right to protection from online abuse, exploitation, cyberbullying, and privacy breaches.
- Digital communication must be transparent, accountable, professional, and purpose-driven.
- The club will respect the rights of children and young people under data protection law, recognising that where they have sufficient understanding, they may exercise their own rights.

3. Management of DDWSC Digital Channels & Online Presence

All official DDWSC digital channels (including website, social media pages, email lists, and messaging groups) will be operated under the following parameters:

- Designated Oversight: Official accounts are managed solely by authorised administrators appointed by the club committee who hold active PVG disclosures (where required for their role) and relevant safeguarding training.
- Privacy Settings: Club social media groups and messaging channels will be set to private or invite-only where practicable, ensuring content is visible only to verified club members and their parents/guardians.

- **Protection of Personal Data (PII):**

- The full name, address, school, personal email, phone number, or social media handles of any young person (under 18) or adult at risk will not be posted on public channels.
- The club will not tag, share, or re-post content from personal profiles of under-18s that reveals identifiable information, except where explicit consent has been provided and it is necessary for club purposes.

- Media Consent & Lawful Basis:

- Photos or video footage of members (including under-18s) will only be published where there is a valid lawful basis under UK GDPR, typically explicit opt-in consent via the club's membership agreement or a separate media consent form.
- Consent forms will clearly state the purpose of the images, how they will be used, where they may appear, and how long they will be retained.
- Accountability: The club will clearly publish the contact details of the designated administrator(s) and the Club Protection/Welfare Officer so members know who to contact with online concerns.

4. Code of Conduct for Staff, Coaches, and Volunteers

All club representatives – paid or voluntary – must adhere to professional boundaries in all digital interactions. These are club standards, designed to reduce risk and maintain trust.

Boundaries & Personal Accounts

- No Personal Connections: Staff and volunteers must not send “friend requests,” follow, or interact with children/young people (under 18) or adults at risk from their personal social media accounts in a way that relates to their club role.
- No Private Messaging: Direct private messaging (DMs) via personal social media or messaging platforms with children/young people or adults at risk is prohibited, except in emergencies or where expressly authorised by the Club Protection/Welfare Officer and recorded.
- Official Channels Only: All routine digital communications relating to club activity must occur via official DDWSC accounts or approved club email addresses.

Professional Communication Standards

- Parental Inclusion: Where practicable and appropriate, digital communications (emails, text messages, app notifications) directed to a young person will include or copy in their parent or legal guardian. Exceptions may apply where:

- The young person is assessed as having sufficient understanding and requests direct communication;
- It is necessary for operational or safety reasons; or
- Inclusion of a parent/guardian would increase risk or undermine safeguarding.

In such cases, staff must record the reason for direct contact and inform the Club Protection/Welfare Officer as appropriate.

- Professional Tone: Written communications must remain professional, transparent, and concise. Avoid informal sign-offs, suggestive symbols, or affection markers (e.g. kisses/"x"s or informal emojis).
- Photography & Privacy: Smartphones or cameras must not be used in private areas (e.g. changing rooms). Pictures must not be taken or shared if doing so breaches an individual's right to privacy or the club's data protection policy.

Prohibited Online Behaviour

- Staff, volunteers, and members must not send, request, or share content that is indecent, sexually explicit, abusive, threatening, or menacing.
- Youth-Produced Sexual Imagery ("Sexting"): Any occurrence involving minors will be treated strictly as a child protection concern under Scottish safeguarding procedures, not as a standard disciplinary issue, and will be handled in line with the National Guidance for Child Protection in Scotland.

5. Direct Communications (SMS, Email, Instant Messaging & WhatsApp)

When using mobile devices, messaging applications (e.g. WhatsApp groups), or email to distribute club information, the following precautions are mandatory:

5.1. Parental Consent & Routing:

- Contact details for members under 18 must normally be held via their parent/guardian.
- Direct contact details for young people will only be held with explicit,

written parental consent or where the young person is assessed as having sufficient understanding and it is appropriate under data protection law.

5.2. One-Way Information Sharing:

- Messages sent by staff or volunteers must be primarily broadcast/informational (e.g. session times, venue updates, weather cancellations, kit reminders).
- Two-way conversations should generally occur in person or via official channels with appropriate oversight.

5.3. Group Chat Safeguards:

- Where group messaging (such as WhatsApp) is used:
 - Group settings should be restricted so only designated administrators can post messages, or posting rights should be strictly controlled.
 - Phone numbers must not be shared beyond necessary administrative purposes without consent.
 - Parents/guardians must be included in any group containing under-18s, unless a documented exception applies.

5.4. Managing Casual Conversations:

- If a young person or participant attempts to engage a coach or volunteer in personal or non-club-related conversation online, the staff member must:
 - Politely end or pause the digital conversation;
 - Redirect the member to discuss the matter in person at the next scheduled session;
 - Immediately inform the Club Protection/Welfare Officer if the content raises any safety or well-being concerns.

6. Handling Online Safeguarding Concerns & Disclosures

- Parity of Reporting: Any concern, disclosure of abuse, or allegation made online or via digital media will be treated with the same seriousness and urgency as a face-to-face disclosure.

- Procedure:

- Disclosures must immediately be recorded in writing and reported to the Club Protection/Welfare Officer in accordance with the DDWSC Safeguarding & Child Protection Policy.

- Where there is an immediate risk of harm, staff and volunteers must contact Police Scotland (999 in an emergency) or the relevant local authority social work service without delay.

- Cyberbullying: Cyberbullying, online harassment, or discriminatory behaviour toward any member will not be tolerated and will trigger the club's Disciplinary and Anti-Bullying procedures, with referral to external agencies where appropriate.

- Adults at Risk: Concerns about adults at risk will be handled in line with the Adult Support and Protection (Scotland) Act 2007 and relevant local inter-agency guidance, with referral to social work or Police Scotland where necessary.

7. Data Protection, Retention & Security

- Lawful Basis: The club will identify and document the lawful basis for processing personal data in digital communications, including contact details, messages, and images.

- Transparency: Members and parents/guardians will be provided with clear privacy information about how their data is used, who can access it, and how to exercise their rights.

- Data Minimisation: Only necessary personal data will be collected and retained for digital communications.

- Retention:

- Contact details and communication records will be retained only for as long as necessary for club purposes and in line with the club's Data Retention Schedule.

- Photos and videos will be reviewed regularly and deleted when no longer needed for the stated purpose or when consent is withdrawn.
- Security: The club will take reasonable technical and organisational measures to protect digital communications and personal data from unauthorised access, loss, or misuse.

8. Policy Governance & Approval

This policy works alongside the DDWSC Safeguarding Policy, Code of Conduct, Anti-Bullying Policy, and Data Protection/Privacy Notice.

Adoption & Review Schedule

- Adopted by Club Committee: March 2026 (original version)
- This revised version: August 2026 (Version 2)
- Next Mandatory Review: August 2027, or earlier if legislation or guidance changes materially.
- Designated Safeguarding Lead: [Insert Name / Contact Email]
- Data Protection Lead (if different): [Insert Name / Contact Email]

Notes for Implementation

- Ensure all staff, volunteers, and relevant members receive training on this policy and the club's safeguarding procedures.
- Keep a record of who has read and understood this policy.
- Review privacy notices and consent forms to ensure they align with this policy and current ICO guidance on children's information.