Digital Safeguarding Policy & Procedures

Version 3 Approved 11/11/2026

HR & Remuneration Sub Committee

Reviewed Annually

VERSION	**Version 3**	DOCUMENT TYPE	**Policy**	DOCUMENT NAME	**Digital Safeguarding Policy**
DATE	**11/11/2026**	REVIEW DATE	**11/11/2027**	DATA CLASSIFICATION	**Internal/External**

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1. INTRODUCTION

Safeguarding is at the heart of everything we do at Active Lancashire. We have a responsibility to protect and promote the safety and wellbeing of children, young people and adults as we help them reach their full potential through great experiences within sport and physical activity.

We are committed to the welfare and safeguarding of all our participants, volunteers and staff both offline and online. As part of this, we believe it's important we can demonstrate best practice in digital safeguarding.

This policy sets out the expectations for all Active Lancashire volunteers, staff, associated partners, third party providers and other users to ensure the protection of children, young people and adults, volunteers and all staff online.

As volunteers and members of staff at Active Lancashire it is our responsibility to raise concerns and report online incidents that happen inappropriately, using this policy and its procedures.

2. ACTIVE LANCASHIRE'S COMMITMENT TO DIGITAL SAFEGUARDING

Active Lancashire is committed to safeguarding our participants, volunteers and staff and we are committed to applying the same rigorous levels of safeguarding protection online as we do in all other circumstances. It is our policy to apply the same rigorous level of safeguarding protection to online as we do in person.

We expect volunteers and staff to follow the Code of Conduct when they are online. Staff and anyone who uses **@activelancashire.org.uk** email addresses must follow the Acceptable Use Agreement.

Additional safeguarding measures must be put in place to minimise specific online risk and these can be found in the following Digital Safeguarding Policy and Procedures that follow.

3. WHO IS THIS POLICY FOR?

This policy is for Active Lancashire's volunteers, staff and all other uses of Active Lancashire's online services, website and platforms.

It is directly related to Active Lancashire's Safeguarding Policies, Procedures and Guidance (Children & Young People and Adults) and Data Management Policy.

4. WHAT DOES THIS POLICY COVER?

This policy specifically covers all Active Lancashire's online and digital activities, plus all digital activities undertaken on behalf of Active Lancashire and third-party social media and devices.

This includes but is not limited to:

- email,
- social media channels (such as Facebook, Twitter, YouTube, Instagram, WhatsApp, TikTok, LinkedIn),
- all blogging platforms,
- volunteer platforms,
- other digital platforms such as Google Hangouts and Zoom,
- ICT devices (including phones)
- internet connectivity that is provided by Active Lancashire.

This policy explains our approach to protecting staff, volunteers and anyone else who has digital access. We are contrained by the terms of service of third-party social media providers in our approach. We promote safe use, but we also recognise that some issues will only be able to be handled by the service provider and the user themselves.

5. DEFINITIONS

5.1 INTRODUCTION

Digital safeguarding means 'the protection from harm in the online environment through the implementation of effective technical solutions, advice and support and procedures for managing incidents'. Active Lancashire is committed to the safeguarding and protection of all participants, volunteers, staff and users of our digital services and social media channels, and we apply the same safeguarding principles to Active Lancashire's activities whether they are offline or online.

This means protecting participants, volunteers and staff from online harms such as:

- Online bullying and harassment
- Sexual exploitation and grooming online
- Discrimination and abuse on the grounds of any protected characteristic
- Sharing of illegal and inappropriate imagery
- Cyberstalking
- Impersonation and hacking
- Disinformation and misinformation
- Oversharing of personal information

5.2 ONLINE BULLYING AND HARASSMENT

Online bullying can be offensive, intimidating, malicious, insulting behaviour and abuse of power which humiliates or denigrates the other person. It can involve one or more person. This can be known as 'trolling' when the user deliberately starts quarrels or upsets people by posting inflammatory or off-topic messages in an online community.

Online harassment can come in the form of unwanted verbal conduct online which has the purpose or effect of violating the dignity of a person and or creating a hostile, degrading, humilating or offensive environment. It can be related to personal characteristics of an individual such as age, sex, race, disability, sexual orientation, gender identity, religion or belief or nationality.

Online examples of this abuse include abusive messages, exclusion from groups, malicious or insulting comments and sharing offensive imagery.

5.3 SEXUAL EXPLOITATION AND GROOMING ONLINE

Sexual exploitation and grooming online is the act of developing a relationship with a child, young person or adult with the intention of abusing them. Offenders use emotional and psychological tricks to build relatonships. The abuse can take place online or offline.

Non-contact abuse is where a person is encouraged to share live or still images of themselves of a sexual nature. They can be forced to commit sex acts or to perform on web cams or built in cameras in phones and other devices.

5.4 DISCRIMINATORY ABUSE ONLINE

It can be an offence to stir up hatred, known as inciting hatred, on the grounds of the following protected characteristics:

- Age
- Sex
- Disability
- Religion or Belief
- Sexual Orientation
- Gender Reassignment
- Marriage or Civil Partnership Status
- Pregnancy and Maternity

The content of a website can also be illegal when it threatens or harasses a person or a group of people. If this is posted because of hostility based on protected characteristic, it can be considered a hate crime, illegal material could be in words, pictures, videos, and even music and can include:

- Messages calling for racial or religious violence
- Web pages with pictures, videos or descriptions that glorify violence against anyone due to a protected characteristic, for example their ethnicity, religion, disability, sexual orientation or because they are transgender
- Chat forums where people ask other people to commit hate crimes.

5.5 SHARING OF ILLEGAL AND INAPPROPRIATE IMAGERY ONLINE

The sharing of illegal and inappropriate imagery online (sometimes known as sexting) can fall into two categories; illegal and inappropriate.

'Illegal' is child sexual abuse imagery and imagery that incites violence, hate or terrorism. Under UK Law it is also illegal to share sexual imagery of adults without their permission. This could include indecent exposure, revenge pornography and deepfakes.

'Inappropriate' in this context could mean the sharing of pornography, violent content, racist content and homophobic, biphobic or transphobic content.

It is an offence to share inappropriate imagery of anyone under the age of 18 and could result in a conviction.

5.6 CYBERSTALKING ONLINE

Cyberstalking is the repeated use of electronic communications to harass or frighten someone, for example by sending threatening communications.

5.7 IMPERSONATION AND HACKING ONLINE

Impresonation and hacking online is where a user pretends to be somebody else, and they may hack into their profile and share information, imagery or posts, on that person's behalf without their permission and in some cases without their knowledge.

5.8 DISINFORMATION AND MISINFORMATION ONLINE

Disinformation and misinformation are the acts of spreading knowledge that is incorrect.

Disinformation is the deliberate intent to spread information which is known to be incorrect. Misinformation is where an individual may not be aware of the fact that they are sharing inaccurate information, for example they share information or content that they believe to be true.

5.9 SHARING OF PERSONAL INFORMATION ONLINE

Personal information includes information that makes an individual personally identifiable. This can include name, date of birth, address, phone number, email address and social media profile name. It may also include identifying details based on an individual's protected characteristics.

6. THE LAW

Active Lancashire adheres to all relevant UK laws relating to users of our digital platforms, third party social media and the use of our ICT equipment.

Relevant laws include:

- Protection from Harassment Act 1997
- Malicious Communications Act 1998

- Communications Act 2003
- Sexual Offences (Amendment) Act 1992
- Computer Misuse Act 1990
- The Equality Act 2010
- Criminal Justice Act 2003 // Criminal Justice (Scotland) Act 2016
- Sexual Offences Act 2003 // Sexual Offences (Scotland) Act 2016
- Serious Crime Act 2015
- Data Protection Act 2018

This list is not exhaustive. We review any changes in legislation to make sure we are compliant.

7. ACTIVE LANCASHIRE'S DIGITAL SAFEGUARDING PRINCIPLES

In order to uphold these principles, our volunteers and staff must:

- Ensure that social media accounts are set up appropriately. (Refer to AL Social Media Policy)
- Make it clear on personal social media accounts using disclaimers that their views, thoughts and opinions are personal and not reflective of Active Lancashire's policies, procedures or guidance.
- Make sure that technical solutions are in place to reduce access to inappropriate content on devices owned or used by Active Lancashire. These could be filtering or monitoring software for example parental controls. (AL provide IT support in this area).
- Ensure the correct permissions are in place before taking and using photographs on mobile devices. (Consent form - video/photography).
- Delete pictures after the event and in accordance with the Active Lancashire privacy policy.
- We recognise that digital safeguarding is an important part of all of our work, and we are committed to always delivering best practice.
- As a volunteer or staff member, if you know of an allegation, concern or disclosure incident you must inform the Designated Safeguarding Lead, Nathan Moulds at nmoulds@activelancashire or by telephone: 07877 647519. Alternatively, you can email the safeguarding team at safeguarding@activelancashire.org.uk

We will:

- Ensure our projects, activities, programmes and campaigns support all participants, volunteers and staff to stay safe online.
- Use best practice digital safeguarding for technical solutions, processes and procedures.
- Help our staff to support volunteers and participants in being effective online.
- Take best practice action when a digital safeguarding incident occurs.
- Support and train appropriate volunteers and staff in digital safeguarding.
- Ensure links with key organisations such as MASH and LSAB/C to raise awareness and refer and report incidents.
- Risk-assess all projects, initiatives, programmes, activities, services and campaigns to make sure appropriate digital safeguards are in place.
- Designated Safeguarding Lead will provide advice and guidance to volunteers, staff and other IT users.

8. HOW TO DEAL WITH AN ISSUE OR CONCERN

When an incident happens or an issue/concern is raise, you must deal with it in the same way as other safeguarding incidents. If you aren't about how to handle incidents you should contact the Designated Safeguarding Lead, Nathan Moulds at nmoulds@activelancashire or by telephone: 07877 647519. Alternatively, you contact the Deputy Safeguarding Officers, Gwen Hughes: ghughes@activelancashire.org.uk // Donna Rilet: drilet@activelancashire.org.uk or you can email the safeguarding team at safeguarding@activelancashire.org.uk

Active Lancashire is committed to the protection of participants, volunteers and staff and will only share information with other agencies where there are significant concerns, or a potential crime has been committed.

9. HOW WILL BREACHES IN THIS POLICY BE MANAGED?

Any breach of this policy by staff or volunteers will be managed under Active Lancashire Safeguarding Policies and could lead to disciplinary action.

Any breach of this policy by staff will be managed under the staff disciplinary procedure.
Staff can find this procedure on the staff shared area.