



# RUGBY FOOTBALL UNION

## Child protection

### Guidance to clubs on club websites, and mobile and on-line communication with children

December 2008

This guidance is important. It is based on current legislation and guidance. It reflects legal duties which clubs owe. Implementing this guidance should help clubs discharge their legal obligations.

#### Club Websites

Websites are a key part of the daily operation of most clubs. They are probably the most flexible way to communicate with members, and to anyone interested in joining a club. They also have the potential to be a very safe way to communicate with children, given their wide accessibility.

However, in the same way that a club has responsibility for the physical safety of a junior member when visiting the club's premises, that club must also ensure that there is nothing on its website which could harm a child, directly or indirectly. A club is responsible for the content of its website.

There are 2 key risks to guard against, and which are constant themes in the more detailed provisions in this guidance:

1. Disclosing personal information about a child to people accessing the website. This could be the child's name, address, or any information about a child's life, interests or activities which would help a stranger target a child, or engage that child in conversation.
2. Abusive or inappropriate content (photos, video or text), on the site itself or on linked sites.

#### ***Website content generally***

There are three main child protection risks associated with content:

1. Inappropriate content (for example violent, sexual or hateful content). Although it is possible to impose restrictions on access, it is overwhelmingly likely that children will be able to access all areas of a club's website. Indeed, most clubs will positively want the website to generate interest among children. The risk applies both to text on the club's website, and on any linked websites.
2. Bullying. This could be material on the site which criticises or humiliates a child. It could also be information which places undue pressure on the child to participate in some aspect of a club's activities.
3. Disclosure of personal information of children. This could lead to grooming.

#### ***Blogs***

Weblogs (also known as Blogs) are a type of content which is becoming commonplace on websites. The creation of a blog is straightforward. It does not require technical or design expertise, and it can be updated remotely. Blogs present two particular challenges:

1. A central part of the attraction of a blog is that it is updated frequently. However the same risks apply to its content as apply to all other content on the site. A club cannot distance itself from the content of a blog it chooses to include on its site.
2. Blogs often contain a lot of opinion, as opposed to purely factual information.

### *Linked sites*

Many sites contain links to other sites. This could be for commercial reasons, such as the sites of sponsors or advertisers, or simply to communicate information to be found on other websites. Before creating a link, a club should check thoroughly the content of the other website, both for child protection reasons, and to ensure the content poses no other risk to the club's reputation. Once a link is included on the site, the club should check its content periodically (the frequency of the checks depending on how frequently the content changes), and remove any link immediately if concerns arise.

An additional concern with linked commercial sites is inappropriate advertising or marketing aimed at children. The advertising industry is self-regulating through the Advertising Standards Authority (ASA), and has produced detailed guidelines covering marketing to children.

### Recommendations:

- Content must be checked that it is appropriate to be seen by children, and that it does not have the potential to bully, before it is included on the website. Sometimes these decisions can be finely balanced. If there is any doubt, the text should not be included.
- The responsibility for checking content needs to be allocated clearly to individual(s) who understand properly the issues involved. This may well be the individual at the club with responsibility for child protection, but this is not essential. The individual should be familiar with this guidance.
- In the unusual circumstance that it is possible any content will go onto the website without being checked by someone else (such as a blog) the club must satisfy itself that the author is sufficiently aware of child protection risks, and the content of this guidance, to be able to self-check effectively.
- Where members of the public can email comments which would then appear on the website (often called a message board, or chatroom, or discussion forum) the content of these emails should be checked before appearing on the website. Publication should not be automatic.
- If a club receives any complaints about content, it should remove the content in question immediately, and reinstate it only once the complaint has been resolved. A club needs to be able to react quickly in the event of any complaint.
- Personal information about children over and above the child's name should not feature on the website.
- Links to another website should not be placed on a club's website unless that club has checked the site's content and is satisfied that the content is appropriate. It is good practice to discuss any proposed link with the owner of the other website, and obtain the owner's assurance that the linked site is designed to be suitable for children at all times of the day or night (some websites' content is different and more adult during the night). If the linked site has marketing content aimed at children, the club should obtain a further assurance from the other website owner that it complies with ASA guidelines.
- The content of linked sites should be checked thoroughly at least once every 6 months.
- If a club learns of any concerns over the content of the linked site, it should investigate immediately. Unless it is clear that there is no need for concern, the link should be removed immediately, and any decision to restore only made after the concern has been investigated.

### ***Photos and video***

Photos and video clips can make any child featured vulnerable to grooming if information about the child (name, address, activities or interests) is also disclosed. Furthermore, posting an image on the website carries a risk that the image could be taken and adapted for an inappropriate use.

Recommendations:

- Use group images, rather than individual images.
- For images of individual children (such as in action shots) where possible use models or illustrations.
- Only use images of children in suitable dress, to minimise the risk of inappropriate adaptation of the image
- If a child is named on the site, do not include an image (individual or group). If a child features in an image on the site, do not use the child's first name or last name, either in text on the site or in the image file name.
- Parents (in this guidance, the term "parents" covers whoever cares for the child), and the child if old enough to understand, should be notified of the intended use of an image on the website. The image should not be used if the parents or the child object (a requirement of the Data Protection Act as well as good child protection practice), and ideally clubs should obtain positive written consent. Where a club regularly uses certain types of image, such as team photos or match photos, notification and a consent request should be included in the information given to junior members and their parents upon joining the club.
- If consent was given initially, but is subsequently withdrawn by parent or child, the image should be removed from the site.

### ***Webcams and live image streams***

The use of webcams on websites is becoming increasingly common, with pictures and sound streamed live. It can be a very effective way to portray a club's activities and atmosphere.

However control is difficult. Any live image stream, by its nature, cannot be checked before transmission. Also, depending on the siting of the camera, it may not be possible to limit the people whose image or speech is transmitted. Furthermore there is a risk that images or speech could help identify children, or contain personal information about those children, and the image stream could attract unwelcome interest from potential abusers. There is less risk when streaming a match or training session, compared to a social event. Schools are advised not to have live image streams on publicly available websites.

Risks are lessened if the streamed images are on a part of the website where access is restricted, such as a members section. However such restricted access prevents the images generating interest in the club among members of the public.

Recommendations:

- A club needs to give careful thought to why it wants its website to stream images, what images it intends to capture, and how they will be presented.
- Any transmitted image stream should be pictures only, without sound.
- As far as possible, the images should be of groups of people, not individuals.
- A club should try to notify all visitors (both adults and children) whose image may be caught that a webcam is in operation. Usually this is through the use of prominent notices placed around all entrances to the area covered by the camera.

## Mobile and on-line communication with children

Technology is moving very fast in this area. There are now many different ways for people to communicate. In addition to land-lines, there are mobile phones for voice and text, and most new phones incorporate cameras that take still shots and video. Two-way video calling is set to grow fast. On-line communication can be by email, instant messaging, chatrooms, and social networking sites.

The risks posed by such methods of communication arise from:

- The privacy. It is usually one-to-one (often chatrooms have the facility for individuals to communicate 1:1 within the chatroom).
- The wide range of content that can be transmitted, including content of a violent, sexual or hateful nature.
- The ease with which images can be forwarded onto others.
- The difficulty in knowing truly who you are communicating with. Where grooming happens, it often involves this type of communication.

In sport, there are additional risks:

- Inappropriate pressure can be exerted by adults, particularly coaches, on children (such as to play when injured).
- There can be inappropriate criticism of a child's performance.
- An official position or role within a club, such as Coach, can carry with it a level of authority, and engender a level of trust, that facilitates the control of a child.

Against this background, a club needs to establish rules covering how adults connected with that club communicate with children connected with that club.

Recommendations:

- Club Officials and Coaches should not communicate with individual children by text or on-line at any time, on any matter, unless there is an immediate risk to the welfare of that child which can be lessened by such contact.
- When communication by phone is needed, where possible Club Officials and Coaches should speak to the parent of a child.
- Club Officials and Coaches can speak to individual children on mobile phones provided they have prior consent from the child's parents, and from the child if old enough to understand.
- If a club needs to communicate club-related information to children by email (such as training or match details), it should use email groups comprising email addresses given by parents. Such emails should only come from specific designated individuals, and children and their parents should know who these designated individuals are. Lists of the individuals within these groups (names only) should be publicised within the club, and easily available. Individuals must consent before they are included in the lists, and must be removed from the list if they wish to leave.

## Implementing guidance

The welfare of children at a club will only be protected properly if guidance is implemented effectively.

Recommendations:

- Based on this guidance, a club needs to devise written policies which cover its own particular circumstances, and meet its particular needs, and then to ensure the policies are followed fully.

- Policies need to be widely publicised. They should be on a club's website, and on display at the club (such as on noticeboard). They should also be emailed or posted to the parents of each child at the club.
- A club needs clear written procedures that set out how its policies are to be implemented. For example, policies should set out how junior match reports will be checked before being put on the website, and how email groups will be maintained. Procedures do not need to be publicised in the way that policies are. Their focus is internal. They should ensure that individual responsibilities are clearly defined and attributed, and people know precisely what action is expected of them to discharge those responsibilities.
- A club needs to make it easy for children, their parents or any interested individual to raise a child protection concern. Many clubs have a designated individual with child protection responsibility, and would want concerns to be raised with that person. If so, their name, photo and contact details should be on the club's website and on display at the club.