



Digital Technologies

Safeguarding Guidance

Document

Version 1, February 2023

There are significant benefits for organisations using texts/emails and setting up social networking sites. Not only is it cheap, it's one of the most direct forms of communication with young people. However, there are risks. Adults who seek to harm children have been known to use messaging to "groom" children. This area is now specifically addressed by the Protection of Children and Prevention of Sexual Offences (Scotland) Act 2005.

For children and young people, the safeguarding risks of these technologies include:

- Inappropriate access to, use or sharing of personal details (e.g. names, email addresses)
- Unwanted contact with children by adults with wrongful/questionable intent
- Being sent offensive or otherwise inappropriate material
- Sending offensive or otherwise inappropriate material
- Online bullying by peers
- Grooming for sexual abuse
- Direct contact and abuse

For adults, risks involved include:

- Their communication with children being misinterpreted
- Potential investigation (internal or by statutory agencies)
- Potential disciplinary action
- Suspension from the sport
- Added to the PVG Children's List and barred

Text & Emails

Staff/volunteers must consider whether it is necessary to communicate with children via text and email. The general principle is that all communications with children should be open, transparent and appropriate.

Good practice would include agreeing with children and parents/carers what kind of information will be communicated directly to children by text message and should be sent in a group communication. This information should only be "need to know" information such as the last-minute cancellation of a training session.

In the first instance parent/carer consent must be obtained for all children under 18 years. Contact should always be made at the phone number/email address the parent has provided on the child's behalf. Parents/carers should be offered the option to be copied into any messages their child will be sent. Although consent is not legally required for young people aged between 16 and 18 it is still recommended that parents are informed of the intention to send their child(ren) emails or texts. It is also good practice to obtain the consent of the 16 to 18 year-old.

The following good practice is also required:

- All phone numbers/email addresses of children and young people should be recorded and kept securely in a locked cabinet or password-protected electronic file or database
- The number of people with access to children and young people's details should be kept to a practical minimum. A record should be kept of their numbers and addresses, namely by the Club Membership Secretary

- Messages should never contain any offensive, abusive or inappropriate language. They should not be open to misinterpretation
- The organisation should be clear that messages should be sent only to communicate aquatics related matters: details of meeting points, training, match details, competition results etc. The same message should be sent to every member of the group/team
- Communication by text/email between coaches/volunteers and children/young people should include a copy to a third party e.g. copy to relevant WPO and/or parent

Internet

The internet brings with it an opportunity for organisations to extend their community profile, advertise and communicate easily with their members.

Sometimes this is done via social networking platforms such as Facebook and Twitter. Thought should be given to content, tone and how sites or social networking platforms and pages will be monitored.

In terms of publishing information and pictures, the following good practice should be noted:

Permission

- Written parent/carer consent must be obtained for all children aged under 18 before publishing any information or pictures of a child. If the material is changed from the time of consent, the parents/ carers must be informed and consent provided for the changes
- Special care must be taken in relation to vulnerable children e.g. child fleeing domestic violence or a child with a disability, and consideration given to whether publication would place the child at risk
- Young athletes who have a public profile as a result of their achievements are entitled to the same protection as all other children. In these cases, common sense is required when implementing these guidelines. All decisions should reflect the best interests of the child

Use of Images and Information

- Information published on the websites/social networking sites must never include personal information that could identify a child e.g. home address, email address, telephone number of a child
- All contact must be directed to the club. Credit for achievements by a child should be restricted to first names e.g. Tracey was Player of the Year 2002
- Children must never be portrayed in a demeaning, tasteless or a provocative manner
- Information about specific events or meetings e.g. coaching sessions must not be distributed to any individuals other than to those directly concerned

Concerns

- Any concerns or enquiries about publications or the internet should be reported to the Club WPO

Social Networking Sites

The following is recommended if the club decides to allow mutual access between it and its members (including children):

Permission

- Obtain written permission from parents/carers of under 18s to allow mutual interaction with the organisation profile. Make parents/carers aware of the profile's existence, the site the child will be accessing and the restrictions of use for this preferred site
- An official agreement should be in place which states that access to members' profiles are used only to pass on relevant information or to answer questions regarding organisation or sport issues. This agreement should also be incorporated into the club rules or Code of Conduct
- Set up a club profile rather than staff/volunteer profiles. This avoids access from members to individual's profiles
- Keep the club profile on "private" – allowing only members access to it (the organisation can monitor this and accept or decline requests to join)

Concerns

- Informal online "chat" with members around subjects outside the sport/activity should be immediately discouraged.

Private matters or questions should also be discouraged. However, any disclosures should be removed from the site and dealt with in line with accordingly.

Internet Forums

There has been an increase in the use and abuse of internet forums to target individuals or to engage contributors in debates which can cause upset and embarrassment to children and young people.

Sites should be well monitored and any offending comments removed.

A coach, member of staff or volunteer should refrain from being drawn into any debates concerning selection, performance or personalities – even where the subject of the discussion is anonymous. This could be considered a breach of the code of conduct or poor practice.

Photography & Video

The aim of these guidelines is to not to prevent bona fide persons from recording footage for performance development reasons or the recording of achievements.

They aim to:

- Ensure that children are protected from the misuse of opportunities to take or manipulate film and video footage in a way that harms children or places them at risk of harm
- The possible identification of a child when an image is accompanied by personal information, which can make a child vulnerable to an individual who may wish to contact and start to 'groom' that child for abuse
- Identification and locating of children where there are safeguarding concerns, which would increase their vulnerability due to:
 - Their removal from their family for their own safety
 - Restrictions on their contact with one parent following a parental separation
 - Being a witness in criminal proceedings

Some sports take place in areas where organisers have little or no control over the environment such as open water or areas to which the public have general rights of access e.g. the open countryside. In these circumstances, organisers should take all reasonable steps to promote the safe use of photographing and filming and to respond to any concerns raised.

Key Principles:

- Scottish Swimming will take all reasonable steps to promote the safe use of photographing and filming at all events and activities with which it is associated. However, Scottish Swimming has no power to prevent individuals photographing or filming in public places
- Scottish Swimming reserves the right at all times to prohibit the use of photography, film or video at any event or activity with which it is associated
- Scottish Swimming has produced a Photographic & Video Equipment Policy

Publishing Images

Rules to remember:

- Ask for parental/athlete permission to take/use their image. This ensures that they are aware of the way the image will be used. A photography/video consent form is one way to do this
- Images will not be shared with external agencies unless express permission is obtained from the child and parent
- If naming a child or group of children in an image, only use their first names, as this will reduce the risk of inappropriate, unsolicited attention from people within and out with the sport
- Never include other detailed information about an individual

- Special care must be taken in relation to vulnerable children e.g. child fleeing domestic violence, and consideration given to whether publication or use of the pictures/film would place the child at risk
- Athletes modesty is to be protected at all times:
 - Action shots should be a celebration of the sporting activity and not a sexualised image in a sporting context
 - Action shots should not be taken or retained where the photograph reveals a torn or displaced swimming costume
 - Poolside shots (non-action shots) of children should normally be above the waist only and with t-shirt being worn (Male and Female), though full club kit shots are approved
 - Athletes should only be photographed in swimwear during action shots
- Scottish Swimming will do everything reasonable in the individual circumstances to give effect to the wishes of parents and children. All actions by Scottish Swimming will be based on the best interests of the child
- No unsupervised access or 1:1 sessions will be allowed unless this has been explicitly agreed with the child and parent
- **No photography or filming will be permitted in changing areas, toilets or showers**
- All images and accompanying information will comply with Scottish Swimming policies, where this is within the control of Scottish Swimming

Use of Photographic equipment at Aquatics events

Scottish Swimming does not want to prevent parents, carers or spectators being able to take legitimate photographs or video footage of competitors.

However, there is evidence that certain individuals will visit sporting events to take inappropriate photographs or video footage of children/young people.

All Clubs should be vigilant about this possibility and implement appropriate procedures:

- Notification prior to event to clubs/parents/athletes of potential photography/filming during aquatic event
- Registration of intention to photograph will be required on the day. This enables tracking of the equipment and operator should concerns arise in the future
- Those who have sought and obtained permission to photograph or film will be formally identifiable e.g. a badge or sticker will be issued, after production of the letter/email of approval and identification
- Information about what to do if concerned about photographing and filming will be available at all events

Concerns:

Anyone behaving in a way which could reasonably be construed as inappropriate in relation to filming or photographing should be reported to the person in charge on the day. The circumstances should be reported to the person in charge on the day or Wellbeing & Protection Officer.

Where appropriate the person in charge / Wellbeing & Protection Officer should report concerns to the police.

Elite Athletes:

As young athletes progress higher up the competitive pathway within their sport, elite level events are increasingly likely to take place in a public arena. Elite young athletes who have a public profile as a result of their achievements are entitled to the same protection as all other children. In these cases, common sense is required when implementing these guidelines, for example avoiding the inclusion of names and some other personal details alongside photographs may not be practical or desirable. All decisions should reflect the best interests of the child.

Scottish Swimming provides information, guidance and support to help athletes manage the media.

Mobile Phone, Cameras & Video

There have already been a number of cases where children have been placed at risk as a result of the ability to discreetly record and transmit images through mobile phones.

There is also scope for humiliation and embarrassment if films or images are shared on popular websites such as YouTube. The use of mobile phones in this way can be very difficult to monitor.

Clubs should follow the guidelines within this section as well as adopt and follow the Acceptable Use of Mobile Phone Policy. Particular care is required in areas where personal privacy is important e.g. changing rooms, showers, bathrooms and sleeping quarters. No photographs or video footage should ever be permitted in such areas of personal privacy.

All concerns about the inappropriate use of mobile phones to record photographs or video footage will be dealt with in line with Scottish Swimming Complaints Policy and/or Disciplinary Procedure. This may include the concerns being reported to the police.



**Scottish
Swimming**



DUNFERMLINE
Amateur Swimming Club

DASC Club Secure Data

Handling Policy

Club Safeguarding Guidance

Version 1, Date November 2024



CLUB SECURE DATA HANDLING POLICY

Safeguarding Guidance

Introduction

The purpose of this policy is to provide guidance and instruction on how to appropriately handle personal data associated with the recruitment of volunteers/paid staff in line with the club's Safer Recruitment Policy. This will provide assurance to members that their personal information will be handled, used, stored and destroyed appropriately and in accordance with the Disclosure Scotland Code of Practice.

Usage and Handling of Personal information

Personal information associated with the Safer Recruitment Process will only be requested when necessary and relevant to a particular role. Information provided will solely be used for recruitment purposes. We will ensure that all sensitive personal information that is collated for the purposes of recruitment will be managed confidentially by those involved.

Access and Storage

Care will be taken in relation to personal information, and we will endeavour to prevent unauthorised viewing, transmission, storage, printing or fraudulent manipulation. We recognise that it is a criminal offence to disclose personal information to any unauthorised person. Personal information is only shared with those authorised to see it in the course of their duties.

Personal information will be deleted as soon as the relevant checks and appropriate suitability has been assessed. The information is stored securely as detailed in the Recording of Information section. No photocopy or other image of the personal information will be retained.

Sharing Information

Personal information will only be shared by the club, with those authorised to see as part of the club's safer recruitment process.

Disclosure information will be used by Scottish Swimming to assess suitability for regulated role being applied for. Please refer to Scottish Swimming's secure data handling policy. Scottish Swimming will only share the outcome of the suitability decision with the club but will not share specific information detailed in the disclosure certificate.

Recording of Information

The club is responsible for keeping accurate information relating to the safer recruitment process. The following information will be collected and recorded securely:

- Self- Declaration forms
- Reference forms
- Personal information for a PVG application
 - Full name
 - Address
 - Date of Birth
 - Role within Club
 - Email Address
 - ID verification
- Recruitment decision taken

Personal information will be stored in secure conditions as follows: information will be stored in the secure club cloud-based files until the recruitment decision has been made. Only those authorised to see this information in the course of their duties will have access to the information.



CLUB SECURE DATA HANDLING POLICY

Safeguarding Guidance

Retention

The club will not retain personal information relating to the safer recruitment process for longer than is necessary for the purpose for which the information was obtained. Self-declarations, references and copies of ID will be destroyed securely on confirmation of recruitment process outcome.

Destruction/Deletion

The club will take reasonable steps to ensure that personal recruitment information is destroyed by suitable and secure means, for example, shredding, pulping or burning. Electronic images from ID checks will also be deleted permanently from both the email address where it was received and from where it is stored.

We will ensure that all volunteers with access to the personal information are aware of this policy and have received training and support to help them to comply with both this policy and the code of practice. A copy of this policy will be made available to anyone who requests it.

DATA PROTECTION & CONFIDENTIALITY STATEMENT CLUB POLICY DOCUMENT



Dunfermline Amateur Swimming Club agree to display consistently high standards of behaviour and appearance, dressing suitably and not displaying behaviour that is abusive or threatening to anyone in our sport or associated with Scottish Swimming.

The club accept that all club members will be held accountable for their behaviour and should anyone act abusively or threateningly, they will be subject to the consequences outlined in the Scottish Swimming Abusive and Threatening Behaviour Policy.

The club will not inappropriately discuss or transmit any confidential information*, either internally or externally, which may affect, harm or concern anyone in our sport or associated with Scottish Swimming.

Regardless of position within Scottish Swimming, members of the club understand and agree that all information and documentation that we will receive, gain access to or be exposed to during and related to our work may only be used for the purpose of which it was given and will not be disclosed without permission.

The club will never use other people's passwords to access personal information.

The Club also agree that they will not copy, or otherwise take, any confidential or sensitive documentation or written information from Scottish Swimming without express permission from the Chief Executive.

Regardless of roles voluntary or paid positions within Scottish Swimming, The Club further understand and agree that this confidentiality agreement continues after the end of our contract or affiliation with the Scottish Swimming.

The Club undertake to ensure all members keep up to date with other policies that may affect their position, such as Data Protection.

The Club understand that a breach of confidentiality on our part would be a breach of the Scottish Swimming policy. This may result in individuals being suspended by Scottish Swimming.

Signed: _____

Position: _____

Date: _____

*For the purposes of this document "information" shall be taken to include the following areas (although it is not intended to be an exhaustive list):

DATA PROTECTION & CONFIDENTIALITY STATEMENT

CLUB POLICY DOCUMENT

- Sensitive information or data – e.g. a Scottish Swimming related discussion/email about a challenge with a club or a particular member; a sensitive discussion about an ongoing child protection incident
- Personal information or data – e.g. member phone number or date of birth (unless permission to circulate has been secured)
- Financial information – e.g. sensitive facts and figures on a club account; a proposal for investment at the Council/Board level; staff salaries
- Commercial information – e.g. notification about a sponsor or product which is not for wider distribution
- Confidential documentation – e.g. Any documentation which has been marked “confidential”, or which has been verbally tagged “not for circulation”
- Child Protection investigations or other information – e.g. any information relating to Child protection enquires at club, district or national level



Dunfermline Amateur Swimming Club Privacy Notice

Privacy Notice for Dunfermline Amateur Swimming Club, which is affiliated with the Scottish Amateur Swimming Association (SASA). Dunfermline Amateur Swimming Club will be a “controller” of the personal information that you provide to us either in writing, or via online methods (for example SASA’s online membership system, known as JustGO) unless otherwise stated. When you register as a member of Dunfermline Amateur Swimming Club or renew your membership (including if you are registering or renewing on behalf of a child under the age of 16), we will ask you for the following personal information: • contact details – name, address, email address (for children under 16 this is the email address of the parent), and date of birth; • membership criteria / category – swimmer, non-swimmer, volunteer; • equality information – disability (if any); and • any other personal information we may require on an occasional basis eg PVG membership.

Why we need your personal information – contractual purposes We need to collect our members’ personal information so that we can manage your membership.

We will use our members’ personal information to:

- provide you with core member services, including insurance, licensing, and PVG checks;
- administer your SASA account online or set up your online SASA membership account if required;
- send you membership communications, by post, online or by email, in relation to essential membership services, including but not limited to, membership renewals and membership fees’.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above membership services.

Why we need your personal information – legitimate purposes Members’ personal data: We also process our members’ personal information in pursuit of our legitimate interests to:

- promote and encourage participation in swimming by sending members’ communications and booking information for upcoming swimming galas and events.

Competitions and events in which we participate may be photographed or filmed for training or live streaming purposes and the images captured from our competitions and events may also be used for promotional, education and development purposes;

- provide access to swimming galas by accepting and managing entries for those competitions and checking yours or your child's personal information to ensure you are entered into the correct category;
- monitor and develop participation in swimming by monitoring members' engagement and participation through attendance and inviting our members to participate in surveys for researching and development purposes;
- develop and maintain our members' qualifications including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and PVG/child protection requirements;
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to swimming. We will use your personal information to investigate your complaint, suspend membership and take disciplinary action where appropriate; and
- run the SASA membership check which can be found online at <https://www.scottishswimming.com/membership/membership-check.aspx> to ensure that a member is eligible to compete or officiate at an event.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us at contact@dasc-swim.co.uk.

If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member. Volunteers' personal data: We will need to collect personal information relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include your PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme. If your PVG certificate is not clear, we will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults. Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes.

If you wish to object to any of the above processing, please contact us at **contact@dasc-swim.co.uk**. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

Why we need your personal information – legal obligations We are under a legal obligation to process certain personal information relating to our members and volunteers for the purposes of complying with our obligations under:

- the Companies Act 2006 to maintain a register of our members, which includes our members' name, address, the date they were admitted to membership and the date on which they ceased to be our member, and hold general meetings, including issuing notices and voting arrangements;
- the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults;

- our Sport Scotland regulatory requirements to report on the size, achievement and profile of our members;
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary; and
- By virtue of affiliation of the Dunfermline Amateur Swimming Club to SASA, the club and its members acknowledge that they are subject to the laws, rules and constitutions of ASA East Scotland, British Swimming and FINA (the world governing body for the sport of swimming in all its disciplines).

Why we need your personal information – equality monitoring requirements We are required to use our members’ personal information relating to a disability for equality monitoring purposes. SASA will process such personal information through aggregated and anonymised reports to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality within our sport. Other uses of your personal information.

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

Who we share your personal information with If your personal information is included in any images or videos taken by us at our swimming galas and events, we may share this with SASA, members of the Scottish media, sponsors, Sport Scotland and Sports Partners (including Scottish Leisure Trusts, Scottish Local Authorities, Swimming Clubs, Scottish Disability Sport, Scottish Universities) for promotional and/or journalistic purposes.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children. We may also share personal information with our professional and legal advisors for the purposes of taking advice. As an affiliated club of SASA we are required to ensure that all of our members are members of SASA as a condition of affiliation.

We will share your name and membership number and category with SASA who will become a “controller” of your personal information when they receive it. SASA’s privacy notice explains how they use your personal information and can be accessed here

www.scottishswimming.com/membership/data-protection

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes. Scottish Swimming employs JustGO to administer our membership database, as part of which JustGO contracts third party payment providers to process our payments on their behalf. JustGo and its payment providers process our members’ personal information on our behalf as “processors” and are subject to written contractual conditions to only process that personal information under our instructions and protect it. For members who are attending UKCC courses run by Scottish Swimming, they use a platform called Onefile to administer the courses. The Onefile system holds basic personal details (name, email, date of birth) and processes learners’ personal information on our behalf as “processors” and are subject to written contractual conditions to only

process that personal information under our instructions and protect it. Our volunteer uses Team Manager 8.0 for Swimming to record swimming gala entries and swim times. This holds first name, surname, date of birth, gender and SASA number for each swimmer and their times at all galas. How we protect your personal information

Your personal information is stored on SASA's electronic filing system and their servers based in Europe, and is accessed by SASA staff and our volunteers for the purposes set out above. Your personal information is stored on Microsoft Onedrive and their servers based in Europe and is accessed by our volunteers for the purposes set out above. Your name and email address is stored on Team Unify and is accessed by our volunteers for the purposes set out above. Members names may be mentioned in our Facebook closed group for the purposes set out above. This group is restricted to current members or the parent/guardian of current members under 16 yrs old.

Our coaches access Team Unify database in case of any emergencies arising during a session.

How long we keep your personal information

We will only keep your personal information for as long as necessary to provide you with membership services. Unless you ask us not to, we will review and possibly delete your personal information where you have not renewed your membership with us for six years.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of Dunfermline Amateur Swimming Club and for how long.

We need to do this to comply with the Companies Act 2006, which requires us to keep a register of members in the event of a claim against Dunfermline Amateur Swimming Club.

Your rights You can exercise any of the following rights by writing to us at membership@dasc-swim.co.uk or by logging on to JustGo at <https://scottishswimming.azolve.com/account.mvc/login>

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a "subject access request";
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so. Any requests received by Dunfermline Amateur Swimming Club will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk. FOR FURTHER INFORMATION PLEASE SPEAK TO A COMMITTEE MEMBER or email secretary@dasc-swim.co.uk