



**Bolton Wanderers**  
Football Club

**Sexting Policy 2019**

## **Sexting Policy**

### **Introduction**

The speed and ease of sharing photographs and videos has brought about serious concerns of young people producing and sharing sexual imagery of themselves. Not only is making, possessing and sharing sexual images of under 18's illegal (including self-images) but can expose young people to risks of embarrassment, bullying, increased vulnerability to sexual exploitation and even blackmail (this later being more prevalent where young people have a high profile).

It is recognised that such imagery will be produced in the vast majority of cases outside the environment of the BWFC Academy however we need to ensure that players within the Academy are safeguarded, supported and educated. This policy provides a guide for all staff working within the Academy/parents and players as to how the Academy will proceed and what steps will be taken should an incident of sexting be reported or suspected.

The issue of sexting will be a part of a Life Skills package of education delivered to scholars in the Under 18's Development Phase and will be covered with players in the Foundation and Youth development phases at an age appropriate level. We recognise that providing players with the knowledge, skills and attributes in relation to this issue will help safeguard them and assist in navigating the associated risks.

This policy forms part of the overall safeguarding policy for BWFC and refers to UK Council for Child Internet Safety guidance "Sexting in Schools and Colleges: Responding to Incidents and Safeguarding Young People"

### **Definition of "sexting"**

There is no clear definition of sexting, it can mean different things to different people. However this policy refers to "youth produced sexual imagery" i.e. the sharing of sexual photographs or videos that they or another young person, have created themselves.

Youth produced sexual imagery includes:

- An under 18 creates and shares sexual imagery of themselves with a peer under 18.
- An under 18 shares sexual imagery created by another person under 18 with a peer under 18 or an adult.
- An under 18 is in possession of sexual imagery created by another person under 18.

Within this policy sexting also includes sending and receiving text based messages relating to sexual behaviour of players within the Academy which do not contain imagery and players under 18 sharing adult digital pornography.

### **Procedure for handling disclosure of "sexting"**

Any disclosure of "sexting" will be dealt with in line with the club's overarching Safeguarding Policy. Staff are aware of how and when to refer disclosures and any incident of "sexting" which comes to staff's attention must at first be referred to the Academy DSO.

- The Designated safeguarding Officer (DSO) alongside the Senior Safeguarding Manager (SSM) will assess the referral and evidence to take initial action. This will depend on the following factors.
  1. Whether there is immediate risk to the young person involved.
  2. If the referral needs to be passed on to the Police or Local Children’s Safeguarding Board (LCSB)
  3. If it’s necessary to view the imagery- in most cases imagery **should not** be viewed
  4. Whether the imagery has been shared widely and via which social media platforms
  5. Whether action should be taken to delete, remove images or text from devices or online services
  6. Whether to contact parents or carers of the young person/s involved – in most cases parents **should** be involved
- Immediate referral to the police/LCSB
  1. Where the incident involves an adult
  2. Where the young person is believed to have been coerced, blackmailed or groomed
  3. What is known about the imagery or text which suggests that it depicts sexual acts unusual for the young person’s age/developmental stage, or are violent
  4. The imagery involves any young person under the age of 13
  5. That there is reason to believe the young person is at immediate risk of harm owing to sharing the imagery e.g. self-harm or suicidal behaviour

If none of the above apply then it may be decided (at the initial review) to respond to the incident without referral to Police/LCSB (however may choose to escalate the incident at any time should further information or concerns come to light). This decision would only be made by the DSO/SSM where they are confident that they have enough information to assess the risks to the young person involved and that these can be managed within the club’s welfare and disciplinary procedures.

Any decision must be made in the young person’s best interest and will take into account proportionality, as well as the welfare and protection of the young people involved.

E.G If the imagery text has been shared consensually (romantic relationship) and there is no intended malice it would be usually appropriate to manage this directly by the club.

If the opposite were the case sharing someone else’s imagery without consent and with malicious intent a referral to the other agencies would be made.

If in doubt about the incident a referral to the police should be made.

All decisions will be recorded in line with safeguarding procedures.

### **Assessing Risk**

If the initial decision is not to refer to the Police/LCSB the DSO must conduct a further review which includes meeting with the young person involved to establish the facts and assess the risk. In this assessment the following should be considered.

- Why was the imagery or text shared?
- Who has shared the imagery or text? Where has it been shared? Has it been shared/received with the knowledge of the young person in the imagery referred to in the text
- Are adults involved?
- What is the impact on the young people involved?
- Does the young person understand consent?
- Has the young person been involved in this kind of activity before?

### **Meeting with young person/people involved**

If the assessment is that the young person is not at immediate risk, any meeting with the DSO will be to determine the best course of action. It is recognised that this could be very difficult for the young person involved and will be conducted confidentially and recorded.

This is a solution focussed meeting and to reassure the young person that the club will do all it can to help and support.

While explaining that it is inappropriate for someone to make the young person feel uncomfortable or pressure them into actions that they do not want to do, the meeting should also a) identify (without looking see P5 Viewing Images) what the image contains or whether anyone else is involved b) find out who has shared or seen the image and how further distribution can be prevented.

### **Informing parents/Carers**

Parents/carers need to be informed at the earliest opportunity within the process unless in so doing would place the young person at risk of harm. The DSO may work with the young person on the best approach for informing parents, which in some cases may be via the young person themselves.

If a decision is made not to inform parents this will be left to the police/LCSB to decide when parents should be informed.

### **Securing devices**

Where the decision is to inform the police any devices need to be handed over. They need to be turned off and kept securely until the police can pick up.

## **Viewing and deleting youth produced sexual imagery**

Adults who are in receipt of a disclosure **should not** view any imagery unless there is a clear reason to do so. Any decision will be made on the professional judgement of the DSO/SSM and never if the act of viewing will cause significant distress or harm to the young person.

If a decision is made to view the DSO/SSM need to be satisfied that:

- It is the only way to make a decision to involve other agencies
- It is necessary to report the image to a web site, app or suitable reporting agency in order for it to be taken down
- A member of staff has unavoidably been presented with an image by a young person or it has been discovered on a club device

If necessary to view the DSO/SSM should:

- Never copy, print or share imagery – this is illegal
- Discuss the decision with the Academy Manager
- Ensure that the DSO views alongside another member of the club safeguarding team with authority from the Academy Manager
- Any viewing takes place with an additional senior member of the staff team present (Do not have to view imagery) and in a room within the Main Stadium.
- Ensure that the image is viewed by staff of the same sex as in the imagery
- Record who was present, why the image was viewed and further action. This must be signed and dated by all involved.

Where a member of staff has unavoidably viewed youth produced sexual imagery appropriate support will be offered as this can be distressing and emotional support may be required.

## **Deletion**

Any imagery made in a disclosure may be required by the Police to further their investigation into a criminal offence being committed. Deleting material should only be considered to prevent further sharing.

The club have no legal power to confiscate devices.

Deletion of imagery should not take place unless there is a good and clear reason to do so and if this is the case the DSO will ask that the young person delete the imagery/text and be given a timescale in which to do so. Parents will be informed and the young person will be required to confirm deletion.

Young people will be reminded that possession of youth produced sexual imagery is illegal and that if they refuse to delete, or it is found later that they did not delete that they are committing a criminal offence which may involve the Police.

All decisions will be recorded including dates/times and reasons for decisions made.

Disciplinary measures may be taken by the club alongside this procedure in cases where players have knowingly produced youth sexual imagery, this could ultimately lead to dismissal from the Academy.

This policy will be reviewed annually.

SE Aug 2019

DSO

Review July 2020

Advice and information for parents on sexting will be delivered at the Player Induction 2019.