Policy Purpose

The purpose of this policy is to ensure that all children, young people and adults engaged with Norwich City Football Club ("the Club") are safeguarded from harm when using digital technologies, including the internet, social media, messaging platforms, gaming environments and emerging technologies.

This policy sets out the principles, expectations and procedures that underpin the Club's approach to online safety and digital safeguarding.

Scope

This policy applies to:

- All Club employees (permanent, temporary, and fixed term)
- Volunteers, agency staff and contractors
- Players (academy and first team where appropriate)
- Participants in Club activities
- Anyone acting on behalf of the Club in a professional capacity

It applies to the use of:

- Club-owned devices and systems
- Personal devices when used in connection with Club activity
- All forms of digital communication and online interaction linked to the Club

Policy Statement

Norwich City Football Club is committed to being a Home for Everyone – an inclusive and safe environment where everyone can thrive, and all feel welcome. We will do this by embedding a culture where every individual engaged with the club is treated with respect and met with positivity and compassion. We are all responsible for upholding the Club's values by ensuring others feel included and valued, championing equality, and challenging all forms of discrimination, increasing our knowledge to develop the confidence to do so.

We believe that together we are stronger; we celebrate diversity and will proactively work with our community to ensure everyone has a fair opportunity to participate. This way Norwich City Football Club will build a culture to be proud of – we will build a Home for Everyone.

Legal Framework

This policy is informed by the following legislation and statutory guidance:

- Keeping Children Safe in Education (KCSIE) 2026 draft consultation
- Online Safety Act 2023 and Ofcom regulatory framework (2024–2026)
- Crime and Policing Act 2026
- Children Act 1989 and 2004
- Safeguarding Vulnerable Groups Act 2006
- Data Protection Act 2018 and UK GDPR
- Equality Act 2010

The Club recognises its responsibility to take reasonable steps to prevent harm, implement appropriate safeguards, and respond effectively to online safety concerns.

Understanding Online Risk

The Club adopts the recognised "4Cs" framework of online risk:

Content

Exposure to harmful or illegal material, including:

- Abuse, racism, misogyny, hate content
- Self-harm or suicide-related content
- Extremism and radicalisation
- Misinformation and disinformation

Contact

Harmful interaction with others, including:

- Grooming and exploitation
- Adults posing as children
- Coercion, manipulation or intimidation

Conduct

Inappropriate or harmful online behaviour, including:

- Bullying or harassment
- Sharing of explicit images (consensual or non-consensual)
- Misuse of digital platforms

Commerce

Risks involving financial harm, including:

- Gambling-related harm
- Scams, phishing and financial exploitation

Emerging and Football-Specific Risks

The Club recognises evolving risks, including:

- AI-generated content (deepfakes, impersonation, synthetic abuse imagery)
- Sextortion and online coercion
- Livestreaming abuse
- Targeted abuse of players (including racist, misogynistic or homophobic abuse)
- Gambling-related risks linked to sport
- Unregulated agent/scout contact via digital platforms

Roles and Responsibilities

All Staff and Volunteers

Must:

- Model safe and professional online behaviour
- Comply with Club Codes of Conduct
- Use approved communication channels when engaging with children
- Avoid personal or private digital contact with participants
- Report concerns, including low-level concerns
- Understand emerging online risks

Designated Safeguarding Lead (DSL)

Responsible for:

- Oversight of online safety strategy
- Managing online safeguarding concerns
- Liaising with statutory agencies
- Maintaining reporting systems
- Conducting annual risk assessments
- Ensuring policy compliance and review

Senior Leadership

Responsible for:

- Ensuring adequate resources for safeguarding
- Oversight of filtering and monitoring systems

- Promoting a safe organisational culture

Filtering, Monitoring and Systems

The Club implements appropriate safeguards in line with KCSIE 2026 draft consultation:

- Filtering systems to block harmful and inappropriate content
- Monitoring systems to identify safeguarding concerns where possible
- Clear allocation of responsibilities between safeguarding and IT
- Regular review and testing of systems
- Escalation processes for safeguarding alerts

The Club acknowledges that technology alone cannot keep individuals safe and adopts a whole-organisation approach.

Use of Social Media and Digital Communication

The Club expects:

- All communication with children to take place via approved platforms
- Transparency in all digital interactions
- No private messaging between staff and participants outside official channels
- Responsible and respectful online conduct at all times

Players and staff should be supported to understand:

- Reputational risks
- Online abuse management
- Privacy and security settings
- Reporting mechanisms

Online Safety Act Compliance

The Club will:

- Take reasonable steps to reduce exposure to harmful and illegal content
- Ensure clear reporting pathways are available
- Respond appropriately to serious online harm, including:
    - Child sexual abuse or exploitation
    - Terrorism or extremist content
    - Threats, harassment or hate crime
- Work with governing bodies, platform providers and statutory agencies
- Escalate safeguarding concerns promptly

Education and Awareness

The Club will:

- Provide regular safeguarding and online safety training
- Educate players, children and families on safe online behaviour
- Promote digital resilience and critical thinking
- Ensure training reflects current risks and emerging trends

Data Protection and Privacy

The Club will:

- Store personal information securely
- Share data only where necessary and lawful
- Ensure appropriate consent for images and media use
- Comply with UK GDPR and data protection legislation

Responding to Online Safety Concerns

The Club will:

- Treat online abuse as a safeguarding issue
- Respond in a timely and proportionate manner
- Consider the needs of:
    - The individual affected
    - The individual displaying harmful behaviour
    - Any wider group or community
- Recognise links between online and offline harm
- Involve police or statutory agencies where thresholds are met
- Provide appropriate support and follow-up

Working in Partnership

The Club will work collaboratively with:

- Parents and carers
- The Premier League / EFL and FA
- Local safeguarding partnerships
- Police and statutory services
- Online platforms where appropriate

Responsibility and Key Contacts

https://www.canaries.co.uk/club/safeguarding

Associated Policies

Safeguarding Children Policy

Safeguarding Adults Policy

Responding to and Managing Allegations Policy

Low Level Concerns Policy

Safeguarding -Behaviour Codes

Policy Issue Date	September 2020	
Policy Review	May 2022	No changes made
Policy Review	March 2024	Link to club safeguarding page added – policy expanded from adults at risk to all adults.
Policy Review	November 2024	Branding update
Policy Review	July 2025	Addition to threats from KCSIE 2025 (July iteration).
Policy Review	July 2026	Reviewed against KCSIE 2026 and Online Safety Act 2023. Additions made to highlight emerging threats and responsibilities.
Review Due	July 2027	

This policy is next due for a general review on the above date. It may however be reviewed and updated earlier, in the event of a change in Club requirements, or relevant legislation