POLICY DOCUMENT

The Recharge Club™

Online Safety and Acceptable Use Policy

Keeping Children Safe Online and Setting Out Acceptable Use of Technology at The Recharge Club

Document Owner:	Mrs Michaela Cmorej, Director and Designated Safeguarding Lead
Company Name:	NutriDive Ltd
Company Number:	16659858
Trading Name:	The Recharge Club™
Registered Office Address:	39 Coltsfoot Drive, Chorley, PR6 0JP
Designated Safeguarding Lead:	Mrs Michaela Cmorej, Director
Deputy Designated Safeguarding Lead:	Mr Michal Cmorej, Deputy Director
Status:	Mandatory Policy — applicable to all staff, bank staff, volunteers and families
Date Adopted:	1st August 2026
Review Frequency:	Annually, and immediately following any online safety incident or change in statutory guidance
Next Review Due:	Twelve months from the date of adoption
Related Policy:	This policy is read alongside the Child Protection and Safeguarding Policy and the No Mobile Phones, Electronics and Valuables Policy

1. Policy Statement

The Recharge Club™ is committed to keeping children and young people safe online, and to setting out clearly how technology may and may not be used by staff, families, and children in connection with the organisation. Children and young people with special educational needs and disabilities can be at increased risk online, including from grooming, exposure to inappropriate content, and exploitation, and staff are trained to recognise and respond to these risks as a normal part of their safeguarding responsibilities.

> ***No member of staff communicates with a child or family using personal social media, personal messaging applications, or a personal telephone number, under any circumstances.***

2. Purpose and Scope

This policy applies to every member of staff, bank worker, volunteer and family connected with The Recharge Club™, and covers the use of the organisation's own devices, staff personal devices, the organisation's website and social media presence, and online safeguarding risks affecting children. It should be read alongside the Child Protection and Safeguarding Policy, the No Mobile Phones, Electronics and Valuables Policy, and the Data Protection Policy and Privacy Notice for Families.

3. Legal and Regulatory Framework

This policy has been written with regard to the following legislation and statutory guidance:

- The Children Act 1989 and the Children Act 2004
- Working Together to Safeguard Children, the statutory guidance on inter-agency working to safeguard and promote the welfare of children
- The Counter-Terrorism and Security Act 2015, under which the organisation has regard to the need to prevent people from being drawn into terrorism, sometimes referred to as the Prevent duty
- The Online Safety Act 2023, insofar as it informs wider public understanding of online harms relevant to children
- The United Kingdom General Data Protection Regulation and the Data Protection Act 2018

4. Staff Use of Organisational Devices

- Photographs and video of children are taken only on devices owned by The Recharge Club™, never on a member of staff's personal device
- Organisational devices are password-protected, and images are transferred to secure storage and deleted from the device as soon as practicable
- Access to the internet on organisational devices during a session is limited to purposes relevant to the child's activity or the organisation's administration

5. Staff Personal Devices

- Staff personal mobile telephones are kept on silent and out of reach of children during direct supervision, and are used only during a break or in a genuine emergency
- A personal device is never used to photograph or record a child under any circumstances
- No member of staff contacts, or accepts contact from, a child or family using a personal social media account, personal messaging application, or personal telephone number; all communication with families takes place through the organisation's official channels

6. Personal Devices Brought In by Children

Children and young people do not bring personal mobile telephones, tablets, cameras, or similar electronic devices into sessions, in line with the No Mobile Phones, Electronics and Valuables Policy. This policy exists both to protect children online and to prevent the covert photography or recording of other children attending The Recharge Club™, which would itself constitute a serious safeguarding and data protection concern.
Medical and communication devices, such as an augmentative and alternative communication device, a smart insulin pump, or a hearing aid with a connected application, are not covered by this restriction and remain available to the child at all times, as set out in full in the No Mobile Phones, Electronics and Valuables Policy.

7. Recognising Online Safeguarding Risks

Staff are trained to recognise the signs that a child may be at risk online, including grooming, exposure to inappropriate or extremist content, cyberbullying, and peer-on-peer abuse conducted through messaging platforms or social media. Signs may include a change in a young person's mood after using a device, secrecy about online activity, or references to a relationship or belief that causes concern.
Any concern of this kind is reported to the Designated Safeguarding Lead immediately and treated as a safeguarding matter in its own right, under the Child Protection and Safeguarding Policy, rather than as a technical or disciplinary issue.

8. The Prevent Duty

The Recharge Club™ has regard to the need to prevent children and young people from being drawn into terrorism. Staff are trained to recognise indicators of radicalisation, including online, and any concern is reported to the Designated Safeguarding Lead, who will seek advice from the relevant local authority Prevent contact where appropriate.

9. Website and Social Media

- The Recharge Club™'s website and social media accounts are managed only by the Director or Deputy Director
- A child's photograph or video is used only with specific, written parental consent, and is never published alongside the child's full name
- Comments and messages received through social media are monitored, and any inappropriate content is removed promptly
- No child or family is contacted directly through the organisation's social media accounts; all individual communication takes place through official channels such as telephone or email

10. Reporting an Online Safety Concern

Any concern about a child's online safety, whether observed directly, disclosed by the child, or raised by a family, is reported to the Designated Safeguarding Lead on the same day and recorded in line with the Child Protection and Safeguarding Policy. Any concern about a member of staff's online conduct is reported in line with the Whistleblowing Policy.

11. Training

All staff, bank staff and volunteers complete online safety training, including the Prevent duty, before working unsupervised with children, refreshed at least every three years.

12. Roles and Responsibilities

Designated Safeguarding Lead	Mrs Michaela Cmorej, Director. Responds to any online safety concern, liaises with the Prevent contact where necessary, and oversees the organisation's website and social media presence.
Deputy Designated Safeguarding Lead	Mr Michal Cmorej, Deputy Director. Deputises fully for the Designated Safeguarding Lead in their absence.
All Staff, Bank Staff and Volunteers	Follow this policy in full, use only organisational devices to photograph children, and report any online safety concern immediately.

13. Monitoring, Review and Related Policies

This policy is reviewed at least annually, and immediately following any online safety incident or change in statutory guidance. This policy should be read alongside the following related policies and documents:

- Child Protection and Safeguarding Policy
- No Mobile Phones, Electronics and Valuables Policy
- Data Protection Policy and Privacy Notice for Families
- Whistleblowing Policy

This policy has been approved by the Director of The Recharge Club™ and forms part of the organisation's statutory compliance framework.