



Version: 2.0

Date adopted: 28/08/2026

Date of next review: 27/08/2026 — reviewed with the Safeguarding Policy, at least every 24 months

Supersedes: Social Media Policy, 8 March 2022

Read alongside: Hitchmough Riding School Ltd. Safeguarding Policy v2.1 (particularly section 15); Code of Conduct; HSI Code of Ethics

1. Purpose

Social media lets us reach clients, the wider equestrian community and the public quickly and directly. We want to use it well. It also carries real risks — to children, to individual privacy, and to the reputation of the business and the people connected with it.

This policy sets out how we use social media, what we expect of the people connected with us, and the rules that protect children and young people online. Online safety must be specifically addressed in child safeguarding arrangements, as required by the 2019 Addendum to Children First: National Guidance for the Protection and Welfare of Children.

2. Who this applies to

This policy has two parts, because we can require different things of different people.

2.1 Persons bound

Sections 4 to 9 are binding on proprietors, employees, self-employed instructors and coaches, contractors, volunteers and yard helpers, and students on placement or work experience. Compliance is a condition of working or volunteering here and forms part of the Code of Conduct that each of these people signs.

2.2 Clients, parents, liveries and visitors

Section 10 sets out what we ask of clients, parents and guardians, livery owners and visitors. These are the conditions on which we run our pages and welcome people to the premises. We cannot impose employment sanctions on a client, but we can moderate our own pages, and persistent or serious breaches may affect a person's continued use of our services.

2.3 What counts as social media

Any platform or service that lets a user publish or share content or communicate with others. This includes but is not limited to Facebook, Instagram, TikTok, X, YouTube, Snapchat, WhatsApp, LinkedIn, Threads, Discord, private groups and group chats, blogs, forums, review sites, and comment sections. It covers text, images, video, audio, live streaming and direct messages.

3. Legal framework

Online communication is subject to the general law. The following are the most relevant:

- Children First Act 2015 and Children First: National Guidance (2017), together with the 2019 Addendum requiring online safety to be addressed in child safeguarding arrangements.
- Criminal Law (Sexual Offences) Act 2017 — including offences of using information and communication technology to facilitate the sexual exploitation of a child, and of meeting or communicating with a child for that purpose.

- Harassment, Harmful Communications and Related Offences Act 2020 (“Coco's Law”) — offences of distributing or publishing intimate images without consent, and of sending threatening or grossly offensive communications.
- Data Protection Act 2018 and the General Data Protection Regulation — photographs and video of identifiable people are personal data. Images of children require particular care.
- Defamation Act 2009, as amended by the Defamation (Amendment) Act 2026, most provisions of which commenced on 1 March 2026.
- Prohibition of Incitement to Hatred Act 1989, which remains in force, and the Criminal Justice (Hate Offences) Act 2024, under which hatred is an aggravating factor in sentencing for certain offences.
- Online Safety and Media Regulation Act 2022, under which Coimisiún na Meán regulates harmful online content and operates the Online Safety Code.
- Copyright and Related Rights Act 2000, as amended — images, music and video belonging to others may not be used without permission.

Unsubstantiated claims, false statements, and defamatory, offensive or threatening comments can lead to civil proceedings or prosecution. This applies to personal accounts as much as to ours.

4. Our accounts

Our official accounts are:

- <http://www.facebook.com/HitchmoughsEquestrianCentre/>
- <https://www.instagram.com/hitchmoughs/>

No other account may present itself as Hitchmough Riding School Ltd. or use our name, logo, photographs or branding.

- Access is through named individual logins with two-factor authentication where the platform supports it. Shared passwords are not used.
- When someone leaves or changes role, their access is removed the same day. This is part of the leavers' checklist.
- Personal accounts, pages or groups that have a Hitchmough Riding School Ltd. look and feel, or that could be mistaken for us, are prohibited.
- Anyone approached by a journalist or asked to comment publicly on behalf of the business refers the request to the proprietor.

5. What we post

We post about lessons, camps, shows and events, yard news, employment and livery opportunities, horse care and welfare, and general engagement with our community. We aim to be prompt, accurate, timely and regular, and to check anything we are unsure of before posting it.

We do not post confidential or sensitive information about any client, member of staff, volunteer or horse owner.

6. Moderation of our pages

People are entitled to voice their opinion, including a critical one. We do not delete comments simply because they are negative, critical or unwelcome.

Where a comment raises a genuine complaint, we respond publicly to acknowledge it and invite the person to raise it through our complaints route, so it can be dealt with properly and privately. We do not conduct disputes about individuals in public comment threads.

We will hide, remove or report content, and where necessary block an account, where it is:

- defamatory;

- infringing copyright or other intellectual property rights;
- in breach of privacy or confidentiality, including posting another person's personal details;
- offensive, obscene or sexual;
- threatening, abusive or insulting, including material likely to stir up hatred;
- bullying or harassing towards any person, including a child;
- an image or video of a child posted without consent, or in breach of section 7; or
- spam, or commercial promotion unrelated to our activities.

A record is kept of content removed and accounts blocked, with the reason and date. Where removed content raises a child protection concern, it is reported under section 7.5 and, where possible, preserved by screenshot before removal and passed to the Designated Liaison Person rather than simply deleted.

7. Children and young people

- The rules in this section are set out in section 15 of the Hitchmough Riding School Ltd. Safeguarding Policy and are reproduced here so that they can be found in one place. Section 15 of the Safeguarding Policy is the authoritative version. If the two ever differ, section 15 applies, and this policy is corrected at the next review.

7.1 Communicating with under-18s

- Staff, coaches, contractors and volunteers do not communicate privately with a child by text, WhatsApp, direct message, Snapchat or any other private channel.
- Communication about lessons, camps and events is with the parent or guardian, or through a group to which a parent or guardian and a second adult from the centre have access.
- Every group chat used for centre activity has at least two adults from the centre in it. No group chat is set up for under-18s that does not include a parent or guardian.
- The centre's own email address and phone number are used for all centre business. Personal numbers and personal accounts are not used to arrange lessons.
- Staff and volunteers do not send or accept friend or follower requests to or from clients under 18 on personal accounts.
- Where a young person contacts a member of staff privately despite these rules, the member of staff does not reply privately. They tell the Designated Liaison Person, and a reply is sent through a parent or guardian or an appropriate group.

7.2 Photography, filming and consent

- Written consent from a parent or guardian, and the agreement of the child, is obtained before any photograph or video of a child is taken or used. Consent is recorded on the registration and consent form.
- Consent is specific: it records what the image may be used for. Consent for one purpose is not consent for another.
- Consent may be withdrawn at any time, in writing or verbally, without giving a reason. On withdrawal we stop using the image and remove it from our own platforms as soon as we reasonably can. We cannot recover material that others have already shared.
- A child's full name is not published with their image, and images are not published alongside personal details such as an address, school or contact information.
- Photography and filming at the centre is done on centre equipment by a named person. Personal phones and cameras are not used to photograph children.
- Images are stored securely on centre systems, are not kept on personal devices, and are retained only as long as the consent and our retention schedule allow.
- Where a professional photographer is engaged for a show or event, they are briefed on this policy, sign it, are supervised, and do not have unsupervised access to children.
- We do not use artificial intelligence tools to generate, alter or animate images of children, and we do not upload images of children to third-party image tools.

7.3 Prohibited areas and devices

- No photography, filming, recording or live streaming in changing areas, toilets, or any other private area, by anyone, at any time. This applies to staff, clients, parents and visitors alike.
- Notices to this effect are displayed at the entrance to those areas.
- Live streaming of any activity involving children is not permitted without the prior written agreement of the proprietor and of the parents or guardians of every child who would appear.

7.4 Young riders' own use of social media

- Young riders are asked to sign the HSI code of behaviour, which covers their own online conduct in connection with the centre.
- They should not post images or video of other people's children without permission, should not post from changing or private areas, and should not post anything that bullies, humiliates or excludes another person.
- Most platforms set a minimum age of 13. We do not encourage or ask any child to open an account, and we do not require a social media account in order to take part in anything we run.
- This is a request to young riders and their families, not a disciplinary rule. Where a young person's online conduct causes harm to another child, it is dealt with under section 6 of the Safeguarding Policy.

7.5 Reporting an online concern

Any concern about a child's safety online, or about online contact between an adult connected with the centre and a child, is a safeguarding concern. It is reported to the Designated Liaison Person the same day, using the Safeguarding Concern Record Form, and dealt with under section 6 of the Safeguarding Policy.

- Where possible, preserve the evidence — take a screenshot showing the account name, date and content — before anything is deleted or reported to the platform.
- Do not confront the account holder, and do not conduct your own enquiries online.
- Where the concern involves an intimate image of a child, or possible grooming, do not forward, download or copy the material. Contact the Designated Liaison Person, who will contact An Garda Síochána.

Designated Liaison Person: **[name]** — [phone]. Deputy: **[name]** — [phone].

8. Personal accounts — staff, contractors and volunteers

What you post on your own account is your business, until it touches this one. The following apply:

- Do not post anything that identifies a client under 18, or that includes an image of a client under 18, even where the centre holds consent for its own use.
- Do not post confidential or sensitive information about clients, colleagues, liveries or horses.
- Do not post content that would bring the centre into disrepute, or that harasses, disparages or insults any person connected with it.
- Do not conduct disputes about the centre, its clients or its staff in public.
- If you identify yourself as working here, make clear that your views are your own.
- Do not use the centre's name, logo or photographs on a personal account or to promote your own services without the proprietor's agreement.

9. Breach by a person bound

An alleged breach is dealt with under the complaints and disciplinary procedure at section 8 of the Safeguarding Policy. The proprietor may require content to be taken down with immediate effect pending the outcome.

Where a breach also raises a child protection concern, it is reported to Tusla or An Garda Síochána under section 6 of the Safeguarding Policy. That reporting is not delayed or made conditional on any internal process. Breaches by an HSI-registered coach may also be reported to Horse Sport Ireland. The centre reserves the right to take legal action where appropriate.

10. Clients, parents, liveries and visitors

We ask everyone who uses our pages or attends the premises to follow these guidelines. They are a condition of using our social media pages, and of attending shows and events here.

- Do not post photographs or video of other people's children without the permission of their parent or guardian. This applies at shows and events as much as at lessons.
- No photography, filming or recording in changing areas, toilets or private areas.
- Do not tag or name other people's children in posts.
- Raise a complaint through our complaints route rather than in a public comment thread. We will always respond, and you will get a fuller answer than a comment thread allows.
- Do not post material about the centre, its staff, clients or horses that is defamatory, abusive, obscene, threatening, or that identifies someone's personal details.
- Do not send direct messages to individual members of staff on their personal accounts about centre business.
- If you are concerned about a child's safety, contact the Designated Liaison Person rather than posting about it.

At shows and open events, a notice setting out these guidelines is displayed at the entrance and included in the schedule.

11. Data protection

- Photographs and video of identifiable people are personal data. We process them on the basis of the consent recorded on the registration and consent form.
- We tell people what images will be used for, keep them securely, and do not pass them to third parties without a separate consent.
- Anyone may ask what images of them or their child we hold, ask for them to be deleted, or withdraw consent. Requests go to [name and role] and are dealt with within one month.
- Images are retained in line with the retention schedule at section 16 of the Safeguarding Policy and then securely deleted, including from any backup where practicable.

12. Review

This policy is reviewed at the same time as the Safeguarding Policy, at intervals of not more than 24 months, and sooner following any incident, any change in legislation or guidance, or any material change in the platforms we use. The proprietor is the final authority on the interpretation of this policy.