



ONLINE SAFETY POLICY

POLICY STATEMENT

Over The Wall is fully committed to upholding the right of all children and young people to be protected from harm or abuse (Children Act, 1989) and to achieve the best outcomes (Department for Education, 2018). This policy outlines the ways in which Over The Wall ensures the safety and wellbeing of children and young people when engaging with our online provision. This policy should be appraised in the context of our Safeguarding Children Policy and Procedures.

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1. Introduction

Policy Aims and Purpose

As outlined in our Safeguarding Children Policy and Procedures, Over The Wall is committed to best practice that seeks to safeguard **all** children and young people linked to its services.

Over The Wall recognises it has a dual responsibility when keeping children, young people and families safe online: to protect children and young people from online abuse, and to recognise and respond to safeguarding or child protection concerns that arise during online provision.

This document specifically outlines the processes, procedures and considerations which are taken when interacting with children, young people and families in an online setting, such as during virtual camps, live streams or camper consultations.

The purpose of this policy is to:

- ensure the safety and wellbeing of children and young people is paramount when providing our online services
- provide staff and volunteers with the overarching principles that guide our approach to online safety
- ensure that, as an organisation, we operate in line with the law and are guided by best practice when approaching online safety

Scope of the Policy

This policy applies to any individual connected to the organisation (in any capacity) who has online contact with the children, young people, and families linked to Over The Wall's services.

This policy should be appraised in the context of our Safeguarding Children Policy and Procedures, available at www.otw.org.uk/otw-policies.

2. Roles and Responsibilities

All staff and volunteers who may come into contact with children or their families/carers online should be aware of their responsibilities for safeguarding and protecting children from harm, how they should respond to child protection concerns and how to make a referral to Safeguarding Partners i.e. Social Services and the Police, if necessary (Department for Education, 2018).

It is recognised that any member of staff or volunteer can make contact with emergency services and/or Safeguarding Partners in the event of concern arising if

there is reasonable cause to suspect a child may come to significant harm if this contact is delayed. In the unlikely event of this occurrence, the Designated Safeguarding Officer or Chief Executive should be informed at the first available opportunity.

Over The Wall Staff

All Over The Wall staff have a responsibility to familiarise themselves with the organisation's Safeguarding Children Policy and Procedures and Online Safety Policy, including escalation routes and procedures.

Staff receive safeguarding training relevant to their role, which is subject to necessary updates, monitored and coordinated by the Designated Safeguarding Officer.

Staff also receive training on the functionality and risks of any online platforms, including moderation and privacy controls, prior to these being used with children and young people.

Staff will only use software and platforms approved by Over The Wall when working with children and young people in an online setting.

Staff will only use equipment and log ins provided or approved by Over The Wall for the purposes of facilitating online services, including use of Over The Wall mobile phones and email addresses.

During each virtual camp session, there will be at least one member of the staff Support Team trained to Level 3 Safeguarding Children or equivalent available in an 'on-call' capacity. This member of staff, and methods of contacting them, will be made clear in the handover session prior to each virtual camp.

Independent Safeguarding Adviser (ISA)

At least one volunteer Independent Safeguarding Adviser should be identified prior to any virtual camp session. This role may be in an 'on call' capacity.

The ISA should be trained to Level 3 in 'Safeguarding Children and Young People' or an equivalent; and will typically come from a professional background with safeguarding experience that is independent to the organisation.

The purpose of the ISA is to work alongside trained members of staff to provide impartial advice on potential safeguarding issues, and to ensure adherence to safeguarding policies and best practice.

If a volunteer ISA cannot be identified from the attending volunteer base, the organisation's Designated Safeguarding Officer takes responsibility for identifying a suitable alternative arrangement.

Volunteers

All volunteers who support Over The Wall's online provision have a responsibility to safeguard children, and to report any concerns about their welfare.

Volunteers are asked to familiarise themselves with, and confirm they have accessed, the Safeguarding Children Policy and Procedures **and** our Online Safety Policy prior to accessing any online provision.

Over The Wall is committed to safe recruitment selection, vetting, and screening practices. These practices are available in our Safeguarding Children Policy and Procedures. In addition to these practices, the following requirements exist for volunteers engaging with children or young people through our online provision:

- Volunteers must have previously attended a residential camp
- Volunteers must have been directed to this policy and agree they have understood its contents
- Volunteers must undertake additional training, through eLearning or video conferencing. This training includes how to recognise, respond to and report concerns in an online setting

These additional requirements must be met ahead of any interaction with campers.

Where volunteers are used to support online provision, a debrief session will be held after interactions with campers to provide an opportunity for feedback and the sharing of any concerns.

3. Online Safety Practices

To ensure the safety of our online provision, all children, young people and families who engage must have been formally assessed and screened to actively identify any safeguarding concerns, additional vulnerabilities, medical and/or psychosocial issues that may have an impact upon their, or others, safety or wellbeing at camp. This assessment, as laid out in our Safeguarding Children Policy, must take place prior to any engagement in our online services.

Before engaging with any online provision, staff, volunteers and families should be reminded to check the privacy settings on their own devices. This may include ensuring their internet connection is secure and anti-virus software is installed and up to date.

When utilising photos or video footage, including conferencing software, staff, volunteers and families should ensure nothing personal or inappropriate can be seen or heard in the background.

In addition to these checks, the following practices will also be followed:

Supervision

Over The Wall operates a strict two adult policy, whereby no adult should ever be alone with a child. Under this policy, any child (or group of children) will always be accompanied by a minimum of two adults. This applies to all areas of Over The Wall's operations, including online provision.

To mitigate against unforeseen circumstances, such as IT failure, at least three adults should be identified to be available for any closed interactions with campers in an online setting (e.g. video conferencing). One of these adults may be an on-call member of staff who is available to access the call.

If the two adult policy is breached during an online session, then the remaining adult on the call should immediately contact the on-call member of staff and ask them to join. In the event the on-call member of staff is uncontactable, the remaining adult should inform the participants that the call will end and should then remain on the call until all the participants have left. The call should not be restarted until there is appropriate coverage. This should be recorded as an incident on the incident log.

Orientation

Campers are orientated to Over The Wall's Camper Charter at the beginning of online provision, and are reminded of these expectations at the start of each day for virtual camps.

At the beginning of any online provision, Campers are told how they can seek support or raise concerns if necessary.

In addition to our Camper Charter, the following tips for keeping safe online should also be shared with campers and families before accessing virtual camps:

- Never share your password or log in with others
- Never share personal information (such as your address, full name or phone number)
- Think before you post – don't upload anything inappropriate or hurtful
- If you're sharing photos or videos, make sure these don't contain personal information
- If you're joining video calls don't wear clothing that says where you live (such as school uniform or local sports team strips)
- Speak to a member of staff or your parents or carers if anything upsets you or makes you feel uncomfortable or unsafe
- Keep your device secure – ask a parent or carer to help with this, there are lots of great tips [here](#).

Livestreaming/Video Conferencing

To create a safe environment for children and young people when watching or engaging in a livestream or video conference, before/at the start of the stream/call they should be reminded:

- of the expectation to behave appropriately
- to not share private information (including passwords)
- to not screenshot or record at any time
- of how to seek support if anything upsets or distresses them

Before hosting a livestream or video conference staff should:

- ensure the platform is approved by Over The Wall for conducting the stream/call
- familiarise themselves with the privacy settings and know how to report and remove any offensive or abusive content
- ensure appropriate adult to child ratios (minimum two adults)
- where possible, provide a 'waiting room' to allow for controlled access to the stream/call
- disable any screen sharing functions for campers
- disable any private messaging functions between campers and only use group messaging functions where appropriate
- be sensitive to the needs of individual campers who may be sensitive to certain topics or issues that may arise during the livestream
- ensure they know how to escalate concerns that may arise during the call, including contact details for the appropriate member of staff/services

(NSPCC, 2020)

Other Interactive Elements

Campers and families may have the opportunity to engage with other elements of online provision which allow them to interact with staff or peers. This includes, but is not limited to, message boards, photo boards, interactive polls, and chat/messaging functions.

Staff will have the ability to oversee and moderate these additional functions in real time, including the ability to proactively stop or remove any offensive or inappropriate content. No interactions will be able to take place in a private setting without this oversight/moderation. In addition, these functions will only exist to allow interactions between campers of a similar age.

5. Supporting Families Without Access to a Device

We understand that not everybody will have a suitable device that means they can access our online camp. In order to overcome this, we have a limited number of devices that can be sent out to families to use for the duration of camp.

Safeguards on Device

The devices have a number of safeguards put on them to ensure the safety of the user and the device, installed by Curatrix. These safeguards include a child-friendly search engine, blocks to stop app downloads and a data-only SIM card so that phone calls and sending texts are not possible.

Sending Devices To Families

Admin staff record who requires a device to attend online camp and will send out a device to the family 10 days before camp starts by recorded delivery. The device will be sent with the Acceptable Use Policy [Appendix], charger and a screen protector to minimise the risk of the screen being damaged. Admin also oversee the use of the device whilst it is in the families possession, for example blocking attempts to download apps.

Return of Devices

Families are expected to return their device within 7 working days of camp ending in the pre-paid envelope provided. Families will be advised to obtain a receipt for proof of postage when returning their device.

Once the device has been returned, staff will view all the media on the phone (e.g. photos, videos) and delete them from the device. If any illegal, inappropriate or harmful material is found on the device, the member of staff will report it to the DSO, who will escalate the concern as necessary.

Process If Device Is Not Returned

If the device is not returned to Over The Wall within 7 working days, the Wellbeing Coordinator will call the family to remind them of the timescale for posting the device back outlined in the Acceptable Use Policy and that we expect the device within an additional 5 working days. At this stage, the device will be shut down so that it is no longer usable by the family.

If it is the case that the family cannot return the phone as they have lost their pre-paid envelope, staff will decide on a case-by-case basis how to proceed.

If after 5 more working days, the device has still not been returned, then the Interim Operations Manager will call the family to request they post the device back immediately.

We will allow another 5 working days for the device to be returned, if it has not been returned within this timeframe, the family will receive notice in writing that we are going to report the incident to the police.

We will then seek advice from the police about how to proceed if the device is still not posted back.

4. Raising and Reporting Concerns

Despite measures being taken to mitigate and minimise risk, there remains the possibility of incidents occurring and/or risk of harm through abuse being identified.

Any incidents or concerns which occur during online provision should be reported, recorded and actioned in line with our Safeguarding Children Policy and Procedures.

For virtual provision, these concerns should be escalated in the first instance to the pre-identified member of staff with Level 3 Safeguarding Children training.

Youth Produced Sexual Imagery

We recognise that online provision brings an increased risk of incidents involving youth produced sexual imagery. This is defined as 'the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18' (UK Council for Child Internet Safety, 2016). The viewing, downloading or sharing of this imagery is illegal.

Concerns around youth produced sexual imagery should be escalated immediately to the pre-identified member of staff with Level 3 Safeguarding training, the Designated Safeguarding Officer and Director of Services.

In the event of an incident involving youth produced sexual imagery occurring during Over The Wall's online provision the following steps will be taken:

- Staff will not purposefully view, download, delete or share the imagery themselves, or ask a child to do this.
- The Director of Services, or an individual allocated by them, will inform the child's parent/carer of the incident, unless informing the parent/carer will put the child at risk of harm.
- In all incidents, a referral will be made to the child's local children's social care.
- If deemed necessary, a report will also be made to the police.

A referral should immediately be made to the police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any child in the imagery is under 13

- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

(UK Council for Child Internet Safety, 2016)

6. Review

This policy is subject to a yearly review for accuracy and currency. This does not prevent any changes taking place to this policy at any other time due to changes in practice or legislation.

7. Contacts

- **Designated Safeguarding Officer** – Kayleigh McGinty, Nursing Coordinator
(kayleigh.mcginty@otw.org.uk/02392 477 110).
- **Interim Operations Manager** – Paul Breen
(paul@otw.org.uk/02392 477 110)
- **Chief Executive**– Kevin Mathieson
(kevin.mathieson@otw.org.uk/02392 477 110).
- **Nominated Safeguarding Trustee** – Dr Bianca Tiesman
(drbianca@doctors.org.uk)

8. References

Children Act, 1989. Available [here](#). [Accessed 17th April 2020]

Childline, 2020. Staying safe online. Available [here](#). [Accessed 17th April 2020]

Department for Education, 2018. *Working Together to Safeguard Children.* Available [here](#). [Accessed 17th April 2020]

NSPCC, 2020. E-safety for Schools. Available [here](#). [Accessed 17th April 2020]

UK Council for Child Internet Safety, 2016. *Sexting in schools and colleges: Responding to incidents and safeguarding young people.* Available [here](#). [Accessed 24th June 2020]

9. Appendix

ACCEPTABLE USE AGREEMENT

This agreement is intended for children, young people and families attending our Camp in the Cloud programme 2021. It is part of our overarching Safeguarding policy and Online Safety policy.

This acceptable use agreement is intended to ensure:

- That users of Over The Wall digital devices will be responsible users and stay safe while using these devices
- That Over The Wall devices and users are protected from accidental or deliberate misuse that could put the security of the device and users at risk
- That users are protected from potential harm through their use of these devices
- Whilst Over The Wall will take reasonable precautions to ensure that all users will be safe when online, we understand that whilst this manages risk, it cannot eliminate it.

Family agreement

As a family, we understand that we must use Over The Wall devices in a responsible way, to ensure that there is no risk to our safety or to the safety of the device.

- We understand that my use of Over The Wall devices and digital communications will be monitored by Over The Wall staff
- We will not try to upload, download or access any materials which are illegal, inappropriate or may cause harm or distress to others. We will not try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials
- We will immediately report any illegal, inappropriate or harmful material or incident we become aware of, to Over The Wall staff
- We will not disable or cause any damage to Over The Wall device, the device's charger, or the device box
- We will immediately report any damage or faults involving Over The Wall's device, the device charger, or the device box to Over The Wall Staff, however this may have happened
- We agree that only the family members that have applied for Camp in the Cloud will use the device
- We understand that if we do not follow this acceptable use agreement, Over The Wall has the right to remove our access to the device
- We agree to return the device, its charger and box, within 10 days of camp ending in the pre-paid envelope provided. We understand that Over The Wall staff will escalate concerns if they are not returned within this timeframe

We have read and understood the above and agree to use Over The Wall's device within these guidelines.