NPUK Policy and Document Control

Safeguarding Policy and Procedure

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Document Name	**Safeguarding Policy and Procedure**
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Version Control

Version	Type of Change	Date	Revision from previous issue
9	Review	May 2020	Helping Children Disclose Abuse added and Addendum relating to COVID-19 epidemic added
10	Review	Nov 2020	Managing Online Communications and Activities and Behaviour Code for Adults Working with Children

Safeguarding Children, Young Adults and Vulnerable Adults' Policy Statement and Procedure

1. Introduction

NPUK is committed to safeguarding the welfare of those children and vulnerable adults that we come into contact with by observing their wellbeing and taking all reasonable and practicable steps to protect them from physical and sexual abuse, emotional harm and neglect; Categories of abuse experienced by children and young adults are described in Appendix 1 and categories of abuse experienced by vulnerable adults are described in appendix 2.

This policy therefore applies to all staff, trustees, volunteers and anyone working on behalf of Niemann-Pick UK. Failure to comply with the policy and procedure will be addressed without delay and may be considered as a breach of conduct.

NPUK has an appointed CEO, Toni Mathieson as the Designated Safeguarding Lead. This is the first point of contact for safeguarding concerns and provides advice, support and ensures that safeguarding remains a priority in all the work we do. Toni can be contacted by email toni@npuk.org or telephone 07816 398 591. In addition, Trustee Jackie Imrie is the Designated Responsible Trustee and can be contacted as follows: email Jackie@npuk.org telephone number 07414 529 392 and, Laura Bell, NPUK Clinical Nurse Specialist is the Designated Staff Team Lead, email laura@npuk.org or telephone 07791 499 555.

2. Policy Statement

The purpose of this policy is:

- To provide a framework to enable Trustees, staff, and volunteers to safeguard the children, young people and vulnerable adults that use the services of NPUK.
- To protect children, young people and vulnerable adults who use the care and support service of Niemann-Pick UK. This also includes the children of adults who use our services.
- To create an environment where children and young people feel comfortable about speaking out if anything is worrying them.
- To provide staff, trustees and volunteers with the overarching principles that guides our approach to safeguarding.

This policy therefore provides clear procedures on what to do if you have a safeguarding concern, how to manage, respond and refer those concerns, and where to go for help and support. This applies to all trustees, staff and volunteers.

3. Legal Framework

This policy has been drawn up on the basis of law and guidance that seeks to safeguard children and vulnerable adults, namely:

- Children Act 1989 and 2004
- Sexual Offences Act 2003
- Mental Capacity Act 2005
- Protection of Freedoms Act 2012
- Care Act 2014
- General Data Protection Regulations 2018

NPUK recognises that:

- In all cases, the welfare of the children, young people and vulnerable adults is paramount and, without exception, they have the right to equal protection from all types of harm or abuse regardless of age, gender, ethnicity, disability, sexual orientation or beliefs.
- Some children and young adults are more vulnerable because of the impact of previous experiences and disabled children and the children from minority ethnic groups may have additional needs to overcome their level of dependency, difficulty in communication or other issues.
- Vulnerable adults, by reason of disability or illness have the right to make decisions for themselves, unless there are clear grounds to override this because of incapacity, or because the wider public interest (such as the protection of others) is involved.

4. Our commitment:

- To recognise safeguarding as a governance priority and to take reasonable steps to protect people who come into contact with the Charity from harm.
- To nominate a designated safeguarding lead and a trustee who is responsible for child protection/safeguarding.
- To conform to all relevant legislation, guidance and best practise.
- To develop procedures which promote children's safety and welfare with regards to: health and safety, anti-bullying, protection of children online, and photography
- To ensure that all Trustees, employees and volunteers within NPUK will have the appropriate Disclosure and Barring Service (DBS) background check prior to commencing work with the Charity.
- To provide procedures, safeguarding education and training to Trustees, employees and volunteers, as appropriate, to enable them to protect young people and themselves and to enable them to recognise and respond to any indications of abuse/ neglect of children to whom they have access.
- To make volunteers aware of this Safeguarding Policy and to give education and guidance on policy and procedures prior to commencing work within the Charity.
- To ensure that all adults working for the Charity in any capacity are made aware, and given a copy of, this Policy.

- To ensure that all concerns and allegations of abuse are taken seriously by trustees, staff and volunteers and are responded to in an appropriate manner. - this may require a referral to the appropriate authorities or services and in emergencies, the Police
- To put in place any special arrangements, as necessary, at Family Conferences and organized events

5. As part of our safeguarding policy, NPUK will seek to keep children and young people safe and will;

- Work in partnership with their parents, carers and agencies to promote the welfare and protection of all children, young people and vulnerable adults and to keep them safe
- Ensure that NPUK Trustees and staff understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children, young people and vulnerable adults.
- Ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern
- Ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored in line with General Data Protection Regulations 2018
- Ensure all appropriate Disclosure and Barring Service checks and other necessary checks are made when recruiting staff and volunteers so as to prevent the employment of unsuitable individuals
- Ensure robust safeguarding arrangements and procedures are in operation
- Implement an effective e-safety policy which covers photography and sharing images
- Share information about child protection and good practice with children, parents, staff and volunteers
- Share concerns with agencies who need to know, and involving parents and children as appropriate.
- Ensure that information collected during this process is secure and is prevented from unauthorised access and disclosure by following NPUK GDPR policies and procedures.

6. Training

- NPUK will arrange training for all care and support staff up to Safeguarding Children Level 3. This meets the recognised standard recommended by the Care Quality Commission (CQC) for health and social care providers.
- Trustees will undergo refresher training on safeguarding children, young adults and vulnerable adults, usually on an annual basis and staff will have refresher training in response to changing requirements and specific areas of risk and safeguarding practice.

7. Recruitment of Staff and Volunteers

NPUK have a responsibility to ensure that newly appointed staff and volunteers are appropriately qualified have the skills and knowledge to deliver an exceptional care and support service and pose no threat to the families we support or to the reputation of the charity.

- NPUK will carry out appropriate checks for roles that involve unsupervised, face to face contact with children, young adults and vulnerable adults and will use the Disclosure and Barring Service to carry out full criminal background checks to prevent the employment of unsuitable candidates.
- NPUK will only carry out the appropriate level of criminal background checks on successful applicants, for employee and volunteer roles, where it can be clearly demonstrated that such a check is justified under the relevant national law.

8. Roles and responsibilities

8.1 Designated Safeguarding Lead

The Designated Safeguarding Lead is the first point of contact for safeguarding concerns and;
- advises on training needs and provides safeguarding advice and support to staff and volunteers.
- manages safeguarding concerns, allegations or incidents that are reported.
- oversees investigations that may become necessary.

8.2 Chief Executive Officer, Designated Responsible Trustee and Staff Team Lead

The Chief Executive Officer will act as the Designated Safeguarding Lead. A Designated Responsible Trustee will provide support and guidance to the Designated Safeguarding Lead when dealing with difficult or urgent concerns, and alongside the Designated Staff Team Lead, will help to manage referrals to safeguarding agencies and to ensure that policies and procedures and complied with, reviewed and updated.

8.3 Trustees

The Board of Trustees recognise safeguarding as a governance priority and will;

- Take reasonable steps to protect people who come into contact with the Charity from harm and review all cases of reported abuse.
- Develop and implement appropriate policies and procedures which will be followed by all Trustees, staff and volunteers.
- Have a process for referring and reporting concerns.
- Ensure that care and support staff who have regular contact with children, young adults and vulnerable adults are properly qualified
- Conduct periodic reviews of safeguarding policies, procedures and practice.
- Follow statutory guidance, good practice guidance and relevant legislation

9. Recording and Reporting Concerns

9.1 General

- Staff and volunteers are asked to report concerns about the welfare of the people that come into contact with and who rely on the services we provide.
- Individual staff and volunteers must never investigate an allegation of abuse unless appointed to do so by the Designated Safeguarding Lead.

In all circumstances, staff and volunteers should take the following action:

- Ensure their own safety – leave the situation if they are at risk of harm;
- Where there is clear evidence of harm or an imminent danger call the emergency services immediately;
- Treat all allegations of abuse seriously;
- Report concerns to the Designated Safeguarding Lead as soon as possible.

9.2 Responding to a Child, Young Adult and Vulnerable at Risk Concern

- **If you witness a safeguarding concern or if one comes to your attention, the following actions must be taken by the member of staff or volunteer person receiving the information:**

- Always offer reassurance, listen to and focus on what is being said.
- never promise to keep secrets or be persuaded by the individual or the family not to take action.
- Discuss "what happened" with the Designated Safeguarding Lead and take advice.

- **If you are worried that the individual is being harmed, or is at risk of harm.**

- Complete a Safeguarding Report as soon as possible after receiving information, including full name, date, time, words spoken, injuries noticed/disclosed, and a brief outline of the concern or incident. Follow up information including the names and address and contact details of the people involved should also be noted.
- You should not try to investigate or verify what is being said, or to examine the child, young adult or vulnerable adult; this is the statutory responsibility of the local authority, child protection services and, or, the police.

- **If the child, young adult or vulnerable adult is at immediate risk of harm, (unless doing so would put you or others at risk):**
  - Refer immediately to the police by calling 999, or NSPCC on 0800 800 5000.
  - Contact your Designated Safeguarding Lead to inform them that you are making a safeguarding report.
  - Explain to the child or young adult that you will be passing this information on, who you'll pass it on to, the reasons why, and any possible actions.

9.3 Reporting the concern to the Designated Safeguarding Lead and Responsible Trustee

- Forward a copy of the completed Safeguarding Report to the Designated Safeguarding Lead
- The Designated Safeguarding Lead will review all details of the case and make a clear assessment of whether the information received is deemed to be a protection referral, and, or, a situation in which further action must be taken. They will inform the Responsible Trustee and may also contact external agencies for further information and advice.
- The Designated Safeguarding Lead will be responsible for agreeing any necessary further action in conjunction with the Responsible Trustee. If a referral is needed to a safeguarding protection agency, this will be completed within 24 hours.
- The Designated Safeguarding Lead will also add details of further people contacted to the Safeguarding Report together with any outcome known at that stage. Reports should be copied to the Responsible Trustee and the Staff Team Lead and the member of staff / volunteer who reported the original concern.
- If, at any point, the situation escalates and it seems that the person is at increased risk, the Designated Safeguarding Lead must immediately contact the police.
- The Designated Safeguarding Lead must establish the outcome of the referral and if the protection services do not make further contact with NPUK within three days, they will contact them for an update.
- The Designated Safeguarding Lead will inform the member of staff or volunteer, who raised the concern, of the outcome in as much detail as possible, respecting confidentiality. In many cases this is likely to be an acknowledgement of receipt of the concern, and confirmation that action has been taken.

10. Disclosure: Helping Children Disclose Abuse

NPUK aims to develop a culture of mutual trust and respect between members of staff and the patients, families and children they support. This is key to creating an environment where children and young people are comfortable about speaking out if anything is worrying them. If a child or young person tells you something that suggests that they are, or another child or young person is, being harmed or are at risk of harm, you should:

- Focus on what the child or young person is telling you
- Let them make the disclosure at their own pace and in their own way
- Avoid interrupting, asking leading questions or probing for more information than the child or young person wants to give you
- Do not promise to keep the information confidential. Explain to the child or young person that you are not able to investigate what they have told you, but that you will need to discuss the issue with someone in else in the Charity.

You should then contact the Designated Safeguarding Lead and follow the procedure detailed in 9.2: Responding to a Child, Young Adult and Vulnerable at Risk Concern.

11. Monitoring and Review

This policy statement applies to all trustees, staff and volunteers. It will be monitored for compliance by the Board of Trustees and the Chief Executive Officer and failure to comply will be addressed as appropriate.

This policy will be reviewed on an annual basis or at the time of changes to legislation or significant events.

12. The General Data Protection Regulation (GDPR)

The General Data Protection Regulation (GDPR) outlines the rights of individuals regarding information that is held and used by organisations. Many of the provisions which were previously within the Data Protection Act 1998 are also present within GDPR but the requirements for transparency have been increased, along with the sanctions for failing to comply. It is important that everyone within the organisation understands their responsibilities under GDPR and complies with its requirements and relevant NPUK Policy and Procedure.

ADDENDUM:

CHILD AND YOUNG ADULT SAFEGUARDING DURING THE CORONAVIRUS PANDEMIC.

Social distancing measures introduced by the government during the coronavirus (COVID-19) pandemic meant we could no longer make home visits.

However, contacting children and families by phone and digital video platform can provide an insight about how well they are coping with the challenges of Niemann-Pick diseases alongside shielding and the pandemic.

The NPUK Care and Support Team undertaking adapted means of contact should be alert to changes that may cause safeguarding concerns. These could be a loss of income, mental health issues, family conflict or difficulty paying bills and basic needs such as food or medication.

If you become concerned, you should discuss these concerns with the Designated Safeguarding Lead and decide how to proceed.

For expert guidance on all matters relating to safeguarding, contact the NSPCC Helpline on 0808 800 5000 or by emailing help@nspcc.org.uk.

If a child or young person needs confidential help and advice, direct them to Childline. Calls to 0800 1111

APPENDIX 1: RECOGNISING THE SIGNS AND SYMPTOMS OF CHILD AND YOUNG ADULT ABUSE

Child abuse within families affected by Niemann-Pick diseases is quite rare. However, it is important that all staff and volunteers understand and look out for the common signs that something may be affecting the child's wellbeing.

In addition, there are signs and symptoms of different forms of abuse which can cause long term damage to a child or young person.

NPUK will arrange refresher training for staff, volunteers and trustees on safeguarding children, young adults and vulnerable adults, including specific areas of risk and safeguarding practice.

Common signs and the types of abuse which can cause long term damage to a child or young adults are defined below:

1. Common Signs That Something May Be Affecting the Child's Wellbeing.

Some common signs that there may be something concerning happening in a child's life include:

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body.

These signs don't necessarily mean that a child is being abused, there could be other things happening in their life which are affecting their behaviour. However, you be alert to changes in behaviour and be open to the possibility of enabling the child or young adult wanting to talk to you about it.

2. Types of Abuse which can Cause Long Term Damage to a Child or Young Person

Child abuse and neglectful behaviour can and does happen to children from any background, culture, class, ethnicity or faith and can be physical, sexual or emotional. It is important that everyone involved in recognising the signs of child abuse understand the physical indicators and symptoms. These definitions and indicators are not meant to be definitive, but to be viewed as guidance. It is important to remember that many children may exhibit some of these indicators at some time and that the presence of one or more should not be taken solely as proof that abuse is occurring.

Physical Abuse:
Most children will collect cuts and bruises as part of the rough-and-tumble of daily life. Injuries should always be interpreted in light of the child's medical and social history. Most accidental bruises are seen over bony parts of the body e.g. elbows, knees, shins and are often on the front of the body.

Some children, however, will have bruising that is more likely to be inflicted rather than accidental. Indicators of physical abuse could include bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible or the 'soft' parts of the body where accidental injuries are unlikely, this could be on their cheeks, abdomen, back and buttocks. Physical abuse may involve hitting, shaking, throwing, drowning, burning or scalding, poisoning, suffocating, or otherwise causing physical harm to a child or failing to protect a child from that harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Emotional Abuse:
This is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, (including cyber- bullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse:
Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non- penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect:
Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. The physical signs of neglect may include constant hunger, sometimes stealing food from other children constantly dirty or 'smelly', loss of weight, or being constantly underweight and inappropriate clothing for the conditions.

Other changes in the behaviour of a child or young person that may indicate neglect include complaining of being tired all the time, not requesting medical assistance and/or failing to attend appointments, having few friends and mentioning being left alone or unsupervised.

Online Abuse:
Online abuse is any type of abuse that happens on the internet, facilitated through technology like computers, tablets, mobile phones and other internet-enabled devices. It can happen anywhere online that allows digital communication, such as:

- social networks
- text messages and messaging apps
- email and private messaging
- online chats
- comments on live streaming sites
- voice chat in games

Children and young people can be revictimised (experience further abuse) when abusive content is recorded, uploaded or shared by others online. This can happen if the original abuse happened online or offline.

Please refer to the NPUK Online Safeguarding Policy and Procedure detailed in **Appendix 3 (p13)**

For further guidance on all forms of abuse, please see:

https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/

12. Online Safety and Help for Parents and Carers

Parents and carers should warn children and young adults of the dangers of accessing inappropriate internet and social media content. (See appendix 1) They should give guidance and advice about using websites and social media channels in a safe and positive manner and set age-appropriate parental controls on digital devices and use internet filters to block malicious websites.

For detailed information regarding inappropriate content and specific topics such as explicit content, social networking, online grooming, gaming, downloading see

https://www.nspcc.org.uk/keeping-children-safe/online-safety/
http://www.childnet.com/parents-and-carers

APPENDIX 2: SAFEGUARDING VULNERABLE ADULTS.

Vulnerable adults, by reason of disability or illness have the right to make decisions for themselves, unless there are clear grounds to override this because of incapacity, or because the wider public interest (such as the protection of others) is involved.

The Mental Capacity Act 2005 is a legal framework which protects people who may lack capacity to make decisions for themselves. It also sets out how decisions should be made on their behalf. The act covers all sorts of decisions, from life-changing events to everyday matters. All safeguarding decisions taken by NPUK must be in accordance with the act. The act says that:

"...a person lacks capacity in relation to a matter if at the material time he is unable to make a decision for himself in relation to the matter because of an impairment of, or disturbance in the functioning of the mind or brain."

– The presumption is that adults have mental capacity to make informed choices about their safety and how they live their lives. Mental capacity and a person's ability to give informed consent are at the heart of decisions and actions taken by NPUK under this safeguarding policy.

Every time we become involved on a safeguarding issue we need to take into account the ability of adults to make informed choices about the way they want to live and the risks they want to take.

Any concerns about vulnerable adults should be discussed with the Designated Safeguarding Lead. This includes how able they are:

- to understand what is likely to result from or affect their situation

- to take action themselves to prevent abuse

- to take part as fully as they can in making decisions about getting other parties involved

ABUSE

Abuse and neglect take many forms. Abuse can lead to a violation of someone's human and civil rights by another person or persons. Abuse can be physical, financial, verbal or psychological. It can be the result of an act or a failure to act.

It can happen when an adult at risk is persuaded into a financial or sexual exchange they have not consented to, or can't consent to. Abuse can occur in any relationship and may result in significant harm or exploitation.

CATEGORIES OF ABUSE AFFECTING VULNERABLE ADULTS

Physical: This includes assault, hitting, slapping, pushing, giving the wrong (or no) medication, restraining someone or only letting them do certain things at certain times.

Domestic: This includes psychological, physical, sexual, financial or emotional abuse. It also covers so-called 'honour' based violence.

Sexual: This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, taking sexual photographs, making someone look at pornography or watch sexual acts, sexual assault or sexual acts the adult didn't consent to or was pressured into consenting.

Psychological: This includes emotional abuse, threats of harm or abandonment, depriving someone of contact with someone else, humiliation, blaming, controlling, intimidation, putting pressure on someone to do something, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or support networks.

Financial or material: This includes theft, fraud, internet scamming, putting pressure on someone about their financial arrangements (including wills, property, inheritance or financial transactions) or the misuse or stealing of property, possessions or benefits.

Modern slavery: This covers slavery (including domestic slavery), human trafficking and forced labour. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse and inhumane treatment.

Discriminatory: This includes types of harassment or insults because of someone's race, gender or gender identity, age, disability, sexual orientation or religion.

Organisational: This includes neglect and poor care in an institution or care setting such as a hospital or care home, or if an organisation provides care in someone's home. The abuse can be a one-off incident or repeated, on-going ill treatment. The abuse can be through neglect or poor professional practice, which might be because of structure, policies, processes and practices within an organisation.

Neglect and acts of omission: This includes ignoring medical, emotional or physical care needs, failure to provide access to educational services, or not giving someone what they need to help them live, such as medication, enough nutrition and heating.

Self-neglect: This covers a wide range of behaviour which shows that someone isn't caring for their own personal hygiene, health or surroundings. It includes behaviour such as hoarding.

These definitions and indicators are to be viewed as guidance. Any concerns about vulnerable adults, at risk, should be discussed with the Designated Safeguarding Lead.

APPENDIX 3: ONLINE SAFEGUARDING

NPUK POLICY AND DOCUMENT CONTROL

Online Safeguarding Policy and Procedure

Document Number	
Document Name	Online Safeguarding Policy and Procedure
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Date Approved	17th June 2020
Document Owner	Toni Mathieson

Version Control

Version	Type of Change	Date	Revision from previous issue
V1	Addition to the Safeguarding Policy	26 June 2020	Movement of services online results in video calls and activities for children which require a separate policy and procedure.
V2	Annual Review	19th June 2021	Annual Review, no revisions made

Online Safeguarding Policy and Procedure

Online Safeguarding Policy and Procedure: Introduction

NPUK is committed to safeguarding the welfare of those children and vulnerable adults that we come into contact with. Whilst we recognise the benefits that online technology and video calls can offer, to communications and child centred activity programmes, we are acutely aware of the potential risks and challenges associated with such use.

The purpose of the online safeguarding policy is to therefore to safeguard and protect children and staff from harmful online interaction and to identify clear procedures to use when engaging with children and concerns for their safety.

The issues classified within online safety are considerable, but can be broadly categorised into three areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material.

- Contact: being subjected to harmful online interaction with other users.

- Conduct: personal online behaviour that increases the likelihood of, or causes, harm.

This policy therefore applies to all staff, trustees, volunteers and anyone working on behalf of Niemann-Pick UK. Failure to comply with the policy and procedure will be addressed without delay and may be considered as a breach of conduct.

NPUK has a Designated Online Safety Coordinator who provides advice, support and ensures that online safeguarding remains a priority in the work we do. This is the first point of contact for online safeguarding concerns.

Contact details

Online Safety Co-ordinator

Name: Toni Mathieson

Email: toni@npuk.org

Responsible Trustee for Safeguarding

Name: Jackie Imrie

Email: Jackie@npuk.org Telephone number 07414 529 392

NSPCC Helpline: 0808 800 5000

Childline: 0800 1111

Policy Statement

The purpose of this policy is to:

- Ensure the safety and wellbeing of children and young people when using the internet, social media or mobile devices to engage with NPUK and the services we provide.
- Provide staff and volunteers with the overarching principles that guide our approach to online safety.

- Provide a framework to enable Trustees, staff, and volunteers to safeguard the children, young people and vulnerable adults that use the online services of NPUK.
- To protect children, young people and vulnerable adults who use the online care and support service of NPUK. This also includes the children of adults who use our services.
- To create an environment where children and young people feel comfortable about speaking out if anything is worrying them.
- To provide staff, trustees and volunteers with the overarching principles that guides our approach to online safeguarding.
- Ensure that, as an organisation, we operate in line with our values and within the law in terms of how we use online devices.

This policy therefore provides clear procedures on what to do if you have an online safeguarding concern, how to manage, respond and refer those concerns, and where to go for help and support. The policy statement applies to all trustees, staff, volunteers, children and young people and anyone involved in NPUK online services or activities.

Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children across the UK. Summaries of the key legislation and guidance are available on:

- Online abuse learning https://learning.nspcc.org.uk/child-protection-system
- Bullying https://learning.nspcc.org.uk/child-abuse-and-neglect/bullying
- Child protection https://learning.nspcc.org.uk/child-protection-system

NPUK believes that:

- Children and young people should never experience abuse of any kind.
- Children should be able to use online platforms to access NPUK online services but safeguards need to be in place to ensure they are kept safe at all times.

We recognise that:

- The online world provides everyone with many opportunities; however, it can also present risks and challenges
- We have a duty to ensure that all children, young people and adults involved in our organisation are protected from potential harm online
- We have a responsibility to help keep children and young people safe online, whether or not they are using NPUK network and devices.
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare and in helping young people to be responsible in their approach to online safety.

We will seek to keep children and young people safe by:

- Appointing an Online Safety Coordinator.
- Providing clear and specific directions to staff and volunteers on how to behave online through our behaviour code for adults
- Supporting and encouraging the young people using our service to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others
- Supporting and encouraging parents and carers to do what they can to keep their children safe online
- Developing an online safety agreement for use with young people and their parents/carers
- Developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or a child/young person
- Reviewing and updating the security of our information systems regularly
- Ensuring that user names, logins, email accounts and passwords are used effectively
- Ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate
- Ensuring that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- Providing supervision, support and training for staff and volunteers about online safety
- Examining and risk assessing any social media platforms and new technologies before they are used within the organisation.

If online abuse occurs, we will respond to it by:

- Having clear and robust safeguarding procedures in place for responding to abuse and online abuse.
- Providing support and training for all staff and volunteers on dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation
- Making sure our response takes the needs of the person experiencing abuse, any bystanders and our organisation as a whole into account
- Reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term.

Types of Online Abuse

Online abuse is any type of abuse that happens on the internet, facilitated through technology like computers, tablets, mobile phones and other internet-enabled devices.
It can happen anywhere online that allows digital communication, such as:

- social networks

- text messages and messaging apps
- email and private messaging
- online chats
- comments on live streaming sites
- voice chat in games.

Children and young people can be revictimised (experience further abuse) when abusive content is recorded, uploaded or shared by others online. This can happen if the original abuse happened online or offline.

For further guidance on all forms of abuse, see:

https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/

Managing NPUK Online Communications and Activities.

In all cases, NPUK will seek the consent of parents should the Care and Support staff need to contact their children at home. This could be as part of an agreed and ongoing support programme or the need to share NPUK online services which include access to group discussions, planned activities and the use of video technology to engage with our Care and Support staff and Communications team.

- In most cases, the parents or carer will be present during video calls and will be able to take part in conversations. Nevertheless, we will request the completion of a standard consent form to cover a designated time frame and this can be cancelled at any time or renewed as appropriate.
- NPUK staff should only provide online services by using their official charity email address, software and equipment. They should never provide access to their personal details or equipment.
- Staff should be aware of the Behaviour Codes for Adults (Appendix 1) and the Behaviour Code for Children (Appendix 2) and act accordingly. Failure to do so could result in breach of conduct and contract.
- Contact with children at home is usually part of an ongoing support programme which leads to positive outcomes. However, if a child or young person tells you something that suggests that they, or another child or young person, are being harmed or are at risk of harm, you should reassure the child that you will take action to protect them and finish the call when you feel the child is safe. You should then contact the Designated Safeguarding Lead to discuss your concerns and determine the most suitable follow up actions.

Contact from children using their own smart phone or tablet

Contact from children is usually made via their parents dialling in and passing the phone or tablet to their child. However, many young children have their own their own smart phone or tablet and can contact NPUK, independently, by using the telephone helpline or by

engaging online to a member of the Care and Support team. Should this happen, you should;

- Determine whether the call is with the parent's approval or not and understand the context in which the call is made.
- Listen and respect the child at all times and allow them to engage at their own pace and in their own way.
- Respect a young person's right to personal privacy as far as possible but if you need to break confidentiality in order to follow child protection procedures, it is important to explain this to the child or young person at the earliest opportunity.
- If you feel that the child is at immediate risk of harm or in imminent danger you should reassure the child that you will take action to protect them, terminate the call when you feel the child is settled and call the emergency services immediately with a follow up call to Social Services.
- You should then contact the designated Safeguarding Lead to inform them that you are making a safeguarding report.

Disclosure; Helping Children Disclose Abuse

NPUK aims to develop a culture of mutual trust and respect between members of staff and the families and children they support. This is key to creating an environment where children and young people are comfortable about speaking out if anything is worrying them.

If a child or young person tells you something that suggests that they, or another child or young person, is being harmed or are at risk of harm, you should:

- Focus on what the child or young person is telling you

- Let them make the disclosure at their own pace and in their own way

- Avoid interrupting, asking leading questions or probing for more information than the child or young person wants to give you

- Do not promise to keep the information confidential. Explain to the child or young person that you are not able to investigate what they have told you, but that you will need to discuss the issue with someone in else in authority.

You should then contact the Designated Safeguarding Lead and follow the Safeguarding Policy and Procedure detailed in the NPUK Policy Statement clause 9.2; Responding to concerns that a Child, Young Adult and Vulnerable or at Risk.

Platforms

Increasingly, children will have access to smart phones and tablets from a young age and those over the age of thirteen can legally subscribe to many social networking sites. General Data Protection Regulation (GDPR) requires that all organisations that are collecting data from children under 13 get parental consent before children start using their services.

NPUK therefore has a responsibility to ensure that children who use our services and social media sites do so in a way that keeps them safe and shows respect for others.

NPUK will;

- Support and encourage parents and carers to do what they can to keep their children safe online.
- Encourage parents and carers to give guidance and advice about how to use websites and social media channels in a safe and positive manner, to set age-appropriate parental controls on digital devices and use internet filters to block malicious websites.
- NPUK will take all opportunities to ensure that children are aware of the dangers of online abuse and will encourage them to consult their parents about individual safeguards and advise.

Zoom, Microsoft Teams and other digital video platforms

NPUK will use Zoom, Microsoft Teams and other platforms deemed to be appropriate to enable video discussions in place of face to face meetings and to enable group activities and discussions between care and support staff, children, the Youth Council and young people's groups;

- NPUK are required to send personalised log on and password details to each participant and is able to act as moderator and prevent unauthorised access to calls.
- There is less opportunity for third parties to gather personal details of participants because there aren't using a personal account to log on.
- As multiple participants can join, NPUK can ensure that two members of staff can take part in child centred conversations when considered necessary.

Facebook

This is the preferred social media site for families and the wider groups of volunteers and friends. NPUK uses Facebook to post uplifting stories and images about fundraising, the work we do and provides daily updates about current and important news items. Young people, over the age of 13 can also use Facebook and we trust parents to approve the use of such channels by their children and to explain the risks involved. NPUK also has a presence on a range of other social media sites but will not actively engage with children on these sites.

Online Safety and Help for Parents and Carers

Parents and carers should warn children and young adults of the dangers of accessing inappropriate internet and social media content. (See appendix 3). They should give guidance and advice about using websites and social media channels in a safe and positive manner and set age-appropriate parental controls on digital devices and use internet filters to block malicious websites.

For detailed information and further guidance on inappropriate content and specific topics such as explicit content, social networking, online grooming, gaming, downloading see;
https://www.nspcc.org.uk/keeping-children-safe/online-safety/
http://www.childnet.com/parents-and-carers

Related policies and procedures

This policy statement should be read alongside our organisational policies and procedures, including:

- Safeguarding Children, Young Adults and Vulnerable Adults
- Code of conduct for staff and volunteers
- Communications Policy
- Whistleblowing Policy and Procedure.
- We are committed to reviewing our policy and good practice annually (See front page, document control).

Appendix 1: Behaviour Code for Adults Working with Children

Purpose

This behaviour code outlines the conduct that NPUK expects from all our staff and volunteers. This includes trustees and anyone who is undertaking duties for the organisation, whether paid or unpaid.

The behaviour code aims to help us to protect children and young people from abuse and reduce the possibility of unfounded allegations being made against the organisation.

NPUK is responsible for making sure everyone providing care and support to children has seen, understood and agreed to follow the code of behaviour, and that they understand the consequences of inappropriate behaviour.

The role of staff and volunteers

NPUK staff and volunteers are acting in a position of authority and have a duty of care towards the children and young people we work with. You are likely to be seen as a role model and are expected to act appropriately.

Responsibility

You are responsible for:

- Prioritising the welfare of children and young people
- Having good awareness of issues to do with safeguarding and child protection and taking action when appropriate.
- Following our values and our policies and procedures for safeguarding and child protection, online safety and whistleblowing.
- Staying within the law at all times

- Modelling good behaviour for children and young people to follow
- Reporting all concerns about abusive behaviour, following our safeguarding and child protection procedures, including behaviour being displayed by an adult or child and directed at anybody of any age.

If you become aware of any unacceptable behaviour or breaches of this code, you must report them to the Chief Executive Officer. If necessary, you should follow our whistleblowing procedure.

Rights

You should:

- Treat children and young people fairly and without prejudice or discrimination
- Understand that children and young people are individuals with individual needs
- Respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems, and appreciate that all participants bring something valuable and different to the organisation
- Challenge discrimination and prejudice
- Encourage young people and adults to speak out about attitudes or behaviour that makes them uncomfortable.

Relationships

You should:

- Promote relationships that are based on openness, honesty, trust and respect.
- Exercise caution when you are discussing sensitive issues with children or young people
- Ensure your contact with children and young people is appropriate and relevant to the work or the project you are involved in
- Ensure that whenever possible, there is more than one adult present during activities with children and young people o
- If a situation arises where you are alone with a child or young person, ensure that you are within sight or hearing of other adults. o
- If a child specifically asks for or needs some individual time with you, ensure other staff or volunteers know where you and the child are.
- Only provide personal care in an emergency and make sure there is more than one adult present if possible

Respect

You should:

- Listen to and respect children at all times
- Value and take children's contributions seriously, actively involving them in planning activities wherever possible
- Respect a young person's right to personal privacy as far as possible.
- If you need to break confidentiality in order to follow child protection procedures, it is important to explain this to the child or young person at the earliest opportunity.

Unacceptable behaviour

When working with children and young people, you must not:

- allow concerns or allegations to go unreported
- Take unnecessary risks
- Smoke, consume alcohol or use illegal substances
- Develop inappropriate relationships with children and young people
- Make inappropriate promises to children and young people
- Engage in behaviour that is in any way abusive, including having any form of sexual contact with a child or young person.
- Let children and young people have your personal contact details (mobile number, email or postal address) or have contact with them via a personal social media account
- Act in a way that can be perceived as threatening or intrusive
- Patronise or belittle children and young people
- Make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children and young people.

Upholding this code of behaviour

You should always follow this code of behaviour and never rely on your reputation or that of our organisation to protect you.

If you have behaved inappropriately you will be subject to NPUK's disciplinary procedures. If serious breach of this code occurs, we may terminate your employment and may also make a report to statutory agencies such as the police and/or the local authority child protection services.

Appendix 2: Code of Behaviour for Children Taking Part in NPUK Online Services

Purpose

This code of behaviour aims to make sure everyone who participates in NPUK online services knows what is expected of them and feels safe, respected and valued.

NPUK will ensure that everyone taking part in our services has seen, understood and agreed to follow the code of behaviour, and that they understand the consequences of inappropriate behaviour. We expect people who take part in our services to display appropriate behaviour at all times. This includes behaviour that takes place outside our organisation and behaviour that takes place

Basic principles

This code of behaviour aims to:

- identify acceptable and unacceptable behaviour
- encourage cooperation, honesty, fairness and respect
- create an environment where your self-esteem, self-respect and self-confidence will grow
- encourage you to recognise and respect the rights of others
- encourage you to take responsibility for your own behaviour

- help resolve conflicts and make it clear what will happen if you decide not to follow the code.

Do's and don'ts

You should:

- Talk to NPUK Care and Support staff about anything that worries or concerns you treat everyone with respect and follow this code of behaviour.
- Have good manners and don't all speak at the same time. listen to others, be friendly and helpful
- Participate in online activity events, group discussions and have fun!
- Take responsibility for your own behaviour

You should not:

- be disrespectful or abusive to anyone else
- Bully other people (online or offline)
- Behave in a way that could be intimidating

What happens if I decide not to follow the code of behaviour?

This code of behaviour is part of our process for making sure everyone who takes part in our services receives the support they need.

If you behave in a way that doesn't follow our behaviour code, our staff or volunteers will remind you about it and ask you to comply with it. This will be an opportunity to change your behaviour

If you continue not to follow the code of behaviour after your first reminder, or if your behaviour is more serious, you will be given a formal warning by the person running your activity. They will make a record about what happened and inform your parents or carers if this is appropriate. They will also talk with you about what happened and agree what support you need to improve your behaviour in the future.

Child protection procedures

If any member of staff or volunteer becomes concerned that your behaviour suggests you may be in need of protection or that you may present a risk of harm to other children and young people, they will follow our safeguarding and child protection procedures. This may involve making a referral to the local authority.

If child protection procedures are necessary we will talk this through with you and your parents as soon as possible, unless doing so would put you in danger or interfere with a police investigation.

The role of parents and carers

We value the role of parents and carers in promoting positive behaviour. We will encourage them to discuss the risks of online abuse with their children and to guide them in the appropriate use online platforms. To help contain the effects of abuse and the collection of personal data, the General Data Protection Regulation (GDPR) requires all organisations that are collecting data from children under 13 get parental consent before children start using their services and devices.

NPUK will always inform and involve parents or carers if we have to speak to you about your behaviour unless doing so would put you in danger.

Appendix 3: Inappropriate Internet and Social Media Content

What is inappropriate content?

As children become more active online at a younger age, the possibility and probability that they'll see something inappropriate all depends on what they're doing online.

Whether it's an explicit pop-up ad on a free game, videos showcasing children's cartoon characters in adult situations, or a forum promoting self-harm, an innocent search can expose children to content that can make them feel upset and confused.

What online activities can increase the possibility and probability that my child will see inappropriate content?

- Joining social networks before reaching the minimum age
- Playing games and using apps which are not age-appropriate
- Watching live streams which may show inappropriate content or taking part in them and unconsciously being exploited

What sort of inappropriate content might my child see?

What you think is inappropriate material for your child will probably differ from your child's view or that of other parents. It will also depend on your child's age and maturity level.

Inappropriate content includes information or images that upset your child, material that's directed at adults, inaccurate information or information that might lead or tempt your child into unlawful or dangerous behaviour. This could be:

- Pornographic material
- Content containing swearing
- Sites that encourage vandalism, crime, terrorism, racism, eating disorders, even suicide
- Pictures, videos or games which show images of violence or cruelty to other people or animals
- Gambling sites

- Unmoderated chat rooms – where there's no one supervising the conversation and barring unsuitable comments.
- Sexism or sites that portray females in very traditional roles that do not reflect contemporary values and expectations

Age ratings and Age verifications – how do they work?

There are a number of ways that you can work out whether a piece of content is suitable for your child. Many platforms use a type of rating to advise on the level of violence and explicit content that a piece of media contains.

In the UK the British Board of Film Classification helps to regulate and classify the content of films shown in the cinema but it is now also working on legislation to restrict access to online pornography by requiring commercial pornography websites to introduce age verification to keep out under 18s.

Social media platforms minimum age of use

Most social media platforms terms and conditions advise that children should be 13 and over to use the platforms. The reason for this minimum age is not to do with the fact that the content on the platform is only suitable for 13 and over but due to COPPA (Children's Online Privacy Act) which is a US law passed to protect the privacy of under 13s).

The General Data Protection Regulation (GDPR) was also introduced to ensure all organisations that are collecting data from children under 13 get parental consent before children start using their services. Since the change, a number of social media platform have amended their terms and condition to comply. WhatsApp actually sought to change its minimum age to 16 rather than 13.

Therefore, it is still important to consider and explore any social media platform that your child is planning to use to get familiar with they might see and what the safety and privacy features it has to protect them in order to make an informed choice on whether they are ready to use it.

Challenges to monitoring what they see online

It can be difficult to monitor what your child is viewing as they can access this material through any internet enabled device, including mobiles such as a smart phone or tablet.

Sometimes your child may stumble upon unsuitable sites by accident, through apps they've downloaded to their mobile device or through links they've been sent by friends, chatting to others online, or even through inter-device communication systems such as Bluetooth or Apple's AirDrop.

Although there are a number of tools you can use to closely monitor what they are doing on their device and block access to certain content through filters, preparing your child for what they might see is vital to make sure they know how to deal with it if they see something they shouldn't.