

**Sage Gateshead**

# **Online Safeguarding Policy**

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## 1. Policy Statement

Sage Gateshead works with children and adults online in a variety of different ways through our building and programmes to fulfil our objectives, part of this is online engagement. Examples of online work includes:

- Music tuition / programmes / activity / meetings;
- Responding to social media feeds on our channels;
- Live streaming events.

The purpose of this policy statement is to:

- Ensure the safety and wellbeing of children and adults when they are using the internet, social media or mobile devices to communicate with us or engage in our activities and events;
- Provide workers, volunteers and contractors with the overarching principles that guide our approach to online safety;
- Ensure that, as an organisation, we operate in line with our values and within the law (Appendix 1).

## 2. Application

The policy applies to all workers, freelancers, volunteers (including trustees) and contractors.

## 3. Definitions and indicators

### 3.1. Definitions

- *Child*: anyone up to the age of 18 years. Once someone reaches their 18<sup>th</sup> birthday, they fall under adult protection legislation and guidance.

*Safeguarding*<sup>1</sup> means the action that is taken to promote the welfare of children and protect them from harm.

It includes:

- Protecting children from abuse and maltreatment;
- Preventing impairment to children's physical and mental health and/or development;
- Ensuring children grow up with the provision of safe and effective care;
- Taking action to enable all children and young people to have the best outcomes;
- Educating those around children to recognise the signs and dangers of abuse and neglect.

*Adult at Risk*<sup>2</sup> is a person aged 18 or over who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs);  
*and*
- Is experiencing, or is at risk of, abuse or neglect; *and*
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.
- *Safeguarding Adults* means: protecting people's rights to live in safety, free from abuse and neglect; people and organisations working together to prevent the risk of abuse or neglect, and to stop it

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<sup>1</sup> Department for Education (DfE), 2018; DfE, 2020; Department of Health, 2017; Wales Safeguarding Procedures Project Board, 2019; Welsh Government, 2020)

<sup>2</sup> Care Act 2014

from happening; and, making sure people's wellbeing is promoted, taking their views, wishes, feelings and beliefs into account.

*Online abuse*<sup>3</sup> is any type of abuse that happens via the internet, facilitated through computers, tablets, notebooks, mobile phones and other internet-enabled devices.

Such abuse can happen anywhere online that allows for digital communication, such as: social networks, text messages and messaging apps, email and private messaging, online chats, live streaming, gaming and voice chat. The risks relate to contact, content, conduct and commercialisation - **see Appendix 2.**

Children and adults can be re-victimised when abusive content is recorded, uploaded or shared by others online. This can happen if the original abuse happened online or offline. They may experience one or more types of abuse online which include:

- Cyberbullying based on their characteristics such as age, gender, sexuality, ethnicity, sexuality, disability;
- Emotional abuse - this includes peer pressure from others, humiliating, put downs or severely criticising another person;
- Sexting or sharing nudes or semi-nudes – where there is pressure or coercion to create and share sexual images, videos or livestreams, which can be used as digital collateral for sexual exploitation;
- Sexual abuse – where children can be groomed online into performing sexual activities online or subsequently in person or both;
- Criminal exploitation whereby perpetrators may use online platforms to build a trusting relationship with a child or vulnerable person to involve them in criminal exploitation such as county lines to move drugs or money around the country or to radicalise them.

*Digital resilience* is about people understanding when they may be at risk online, knowing what to do if something goes wrong, learning from the experience of being online, being able to recover from any difficulties or upsets and who to turn to for support with this.

### **3.2. Vulnerabilities**

Children and adults who are perceived as having additional vulnerabilities in the offline world are often more vulnerable and susceptible to coercion and exploitation when online and offenders will deliberately target such vulnerabilities.

Children and adults can be less inhibited in their communications online and may open up more quickly to share their worries or problems, which can be positive in terms of helping them get support early. However, this can also pose risks to them if information is shared with someone who wishes to cause them harm.

### **3.3. Signs of online abuse**

- Child or adult seeming distant, upset or angry after being online;
- Or the opposite, seeming extremely happy and confident;
- Spending more (or less) time than unusual interacting online;
- Becoming secretive with devices and profiles and who they are talking with;
- Having lots of new contacts or devices that they would have no means of buying for themselves.

### **3.4. Impacts of online abuse**

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<sup>3</sup> Department for Education, 2018; Department of Health, 2017; Scottish Government, 2014; Welsh Assembly Government, 2018

Online abuse can have short and long-term impacts ranging from self-harm or suicide, inability to trust, poor physical or mental health, difficulty in forming relationships or impeding success in education, work or family life or even death.

For further information about the indicators of abuse and neglect see the **Safeguarding Procedures: Appendices 2-6**.

#### 4. Our principles:

- Children and adults should never experience abuse of any kind so online safeguarding is an organisational priority for Sage Gateshead;
- The online environment provides benefits for children and adults. It aids communication, connectivity, social skills and resilience, digital skills and literacy, education and entertainment and enables us to achieve aspects of our overall strategy;
- Everyone, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, marriage or civil partnership, pregnancy or maternity have the right to equal protection from all types of online harm or abuse.

#### 5. We recognise that:

- The online world provides everyone with many positive opportunities; however, it can also present risks in respect of harm arising out of conduct, content, contact and commercialisation (see Appendix 2 for further details);
- We owe a duty of care to ensure that all children and adults involved with our organisation and participating in our programmes are safeguarded;
- We have a responsibility to help keep children and adults safe online and promote their digital resilience;
- Working in partnership with children, adults, parents/carers, teachers, event organisers, other professionals, organisations and agencies is essential in safeguarding and promoting welfare and in helping children and adults to be responsible in their approach to online safety.

#### 6. Online safeguarding arrangements

Sage Gateshead will seek to keep children and adults safe online by implementing the following measures:

##### *6.1. Policies and practices*

We will:

- Identify specific employees who have safeguarding responsibilities (see Appendix I of the **Safeguarding Policy**) including a DSO for online safety;
- Provide an online safety agreement for use with children, adults at risk and their parents/carers which includes: a code of behaviour for children and adults and how inappropriate behaviour is managed (**Appendix I**); signposting to support and reporting tools/helplines; and the safeguarding contacts at Sage Gateshead;
- Provide guidelines for tutors and learners engaged in online sessions and events in terms of their responsibilities, behaviour and using the required technology
- Ensure that safeguarding expectations and arrangements are included in all partnership arrangements and contracts;
- Provide a safeguarding code of conduct for workers, volunteers and contractors which clarifies expected behaviour in their interactions with children and adults online (see **Safeguarding Code of Conduct**);
- Provide safeguarding procedures for reporting any concerns or allegations including online abuse (see the **Safeguarding Procedures**);

- Ensure any images or film are taken and used online only when consent has been obtained in accordance with the purpose specified, compliant with GDPR and that it is made clear how consent may be withdrawn (see **Safeguarding Procedures**);
- Recognise that safeguarding concerns may be identified through social media posts, text or email exchanges and ensure workers, volunteers and contractors know how to respond;
- Involve the relevant employees (e.g. education, digital, social media, IT, DSO, data protection) when planning any online work with children and adults to enable a co-ordinated approach and taking any potential online risks into account;
- Conduct spot checks to monitor and quality assure our online music tuition and activities;
- Provide everyone leading music tuition with a Sage Gateshead email address;
- Provide guidance on about what is permitted as recording sessions;
- Provide guidance about delivering live streamed events;
- Have procedures about setting up new staff and children’s accounts.

*6.2. Infrastructure and technology*

- Regularly review and update the security of our information systems;
- Ensure personal information about the children and adults who are participating in Sage Gateshead events or programmes are held securely and shared only as appropriate e.g. home address, logins, email accounts etc;
- Examine, risk assess and approve all social media platforms and apps before they are utilised by any workers, freelancers or volunteers wanting to use them in Sage Gateshead work;
- Update risk assessments when new features are released in platforms or apps or when the purpose for which they are being used with children or adults changes and communicate this information to the relevant employees, freelancers or volunteers;
- Permit employees and freelancers to use only Teams or Zoom for online tuition
- Ensure that outstanding online safeguarding risks are added to the corporate risk register;
- Provide Sage Gateshead devices for the delivery of all music tuition by employees, freelancers and volunteers which must always be used;
- Ensure platforms are safe for use by disabling non-essential features, e.g. chat or external use of emails;
- Only share link to virtual lessons with a music tutor, student, parent/carer behind a login wall.

*6.3. Education and training*

- Provide induction, support and online safeguarding training, including refresher training for relevant employees, freelancers and volunteers (see **Safeguarding Training Strategy** for more details);
- Provide technical training/information on the features and functions of the platform or app being used for working with children and adults;
- Signpost children, adults and parents/carers to sources of support, advice and information about online safeguarding and reporting concerns onwards.

**7. Related policies and procedures**

This Policy should be read alongside the related organisational policies and procedures which make up Sage Gateshead’s safeguarding framework:

Safer Recruitment and Vetting Policy and Procedures	IT Acceptable Use Policy
Public Interest Disclosure (Whistleblowing Policy)	Discrimination, Bullying and Harassment Policy
Disciplinary Policy and Procedures	Privacy Policy

Safeguarding policy and procedures	Creative Learning: guidelines for residential and tours
Safeguarding Code of Conduct	

In addition, there are specific guidance documents developed for online music tuition and activities which apply to all those engaged in this area of work:

<p><b>Guidance for parents/students</b></p> <ul style="list-style-type: none"> <li>▪ Young people’s consent form : <a href="#">YMP Consent Form</a></li> <li>▪ Brief for parents / carers – a safeguarding checklist</li> <li>▪ YMP at Home Risk Assessment</li> </ul>	<ul style="list-style-type: none"> <li>▪ Guidance for working on digital platforms</li> <li>▪ Code of Conduct for Music Leaders and Tutors</li> </ul>
<p><b>IT set up guidance</b></p> <ul style="list-style-type: none"> <li>▪ Teams Quick Guide – Parents / Carers / Students</li> <li>▪ Teams Quick Guide – Music leaders / Tutors</li> </ul>	

**8. Legal framework**

This policy has been drawn up based on UK/English law, policy and guidance (see Appendix I).

**9 Contact details**

If you have any online safeguarding concerns or allegations because of working in the online environment please report them immediately to both:

**9. Contact**

If you have any safeguarding concerns or allegations, please report them immediately using the following contact information:

Email: [safeguarding@sagegateshead.com](mailto:safeguarding@sagegateshead.com)

Number: (0191) 443 4625 (24 hours)

**10. Review**

This policy will be reviewed annually or sooner if an incident, change in legislation or the nature of our activities with children and adults at risk. Responsibility for the review lies with the Safeguarding Director.

## Appendix I

- Underpinning legislation and guidance
- United Nations Convention on the Rights of the Child 1991
- Protection of Children Act 1978
- Children Act 1989 and 2004
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Communications Act 2003
- Malicious Communications Act 1988
- Counter Terrorism and Security Act 2015
- Serious Crime Act 2015
- Modern Slavery Act 2015
- Defamation Act 2013
- Digital Economy Act 2017
- Data Protection Act 2018, GDPR 2018
- Privacy and Electronic Communications Regulations (PECR)
- HM Government (2018) Working Together to Safeguard Children
- Voyeurism Act 2019
- Communications Act 2003
- Malicious Communications Act 1988

## Appendix 2

### Children and young adults online - the risks<sup>4</sup>

Harm	Description and example	What you should know
<b>Conduct</b>	<p>Giving away personal information online such as full name, address, live location or other identifiable information.</p> <p>Posting or sharing things online that may for instance be offensive to others, Feeling pressure or desire to 'fit in', causing young people to participate in harmful 'challenges' or send inappropriate content or images/videos of themselves.</p>	<p>It's important for organisations to role model good behaviour and provide children and young adults with positive opportunities to interact online with others.</p> <p>While we should not put the responsibility on children and young adults to 'stay safe' online, they should be equipped with skills to navigate the online world safely.</p>
<b>Content</b>	<p>Illegal, age-inappropriate or harmful content such as pornography or violent material, self-harm and suicide content, discriminatory content e.g. racist, homophobic or transphobic.</p> <p>Unreliable content such as inaccurate or misleading information.</p>	<p>Community and youth organisations can play an important role in supporting children and young adults to access safe and reliable information and provide support and help if they access illegal or harmful content.</p>
<b>Contact</b>	<p>Children and young adults can be bullied online by their peers or adults or contacted by those who seek to abuse, exploit or harm them. This can include hate speech, abusive comments and language, being sent or asked to do sexually explicit activity, or being asked for financial information. Factors such as grooming, cyberbullying and wider online friendships all come under this category. Find out more at <a href="http://www.childnet.com">www.childnet.com</a>.</p>	<p>When providing opportunities for new people to engage and meet, it's important to provide a safe space online that has clear ground rules. It is also likely that young people will interact with people online that they don't know offline, which needs to be managed safely.</p>
<b>Commercialism</b>	<p>Online advertising and marketing can make children and young adults want certain things and they can find it difficult to recognise adverts online. This can result in inadvertent purchases online as well as pressure to do so.</p>	<p>When using online platforms such as social media sites or video-hosting platforms such as YouTube, adverts and pop-ups appear. This is relevant to deciding what platform to post content, particularly if you are using social media advertising or using tracking and cookies on your websites.</p>

<sup>4</sup> Source: Digital Skills for Heritage (2020) *Working with children and young people online*.