

# Online Safety Policy

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**Responsible:** Chief Executive



Modern digital technology has made access to information and communication increasingly easy for everyone. Government guidance is clear that all organisations working with children, young people, adults at risk, families, parents and carers have a duty of care for online safety. It is also important to remember that children, young people and adults at risk can also abuse and such incidents fall into the remit of this policy.

## Contents

Policy Statement.....	1
Purpose .....	1
Scope .....	2
Definitions .....	2
Responsibility .....	2
Online Safety Code of Conduct .....	2
Online risks .....	3
Social media .....	3
Minimising Risks .....	4
Reporting Concerns.....	5
Appendix 1- Online Safety Referral Flowchart – Child and Adult.....	6

## Policy Statement

The Cleft Lip and Palate Association (“CLAPA”) recognises that the welfare of all our online service users is paramount and regardless of ability or culture, they have equal rights of safeguarding. CLAPA has a duty of care and we will do everything possible to provide a safe and caring environment.

## Purpose

CLAPA recognises that, in this digital age, increased use of the internet, mobile phones and other electronic technology has made access to information and communication increasingly easy for everyone. However, with this ease of access comes certain risks. This policy will set out the means by which CLAPA will minimise these risks as much as possible. As many of these risks reflect situations that may arise offline, this online safety policy must be used in conjunction with other relevant policies referenced throughout.

## Scope

This policy applies to everyone involved with CLAPA and anyone else involved in the use of communications technologies (belonging to CLAPA or the individuals themselves), whilst accessing CLAPA's services.

## Definitions

The term 'CLAPA Staff' encompasses all staff, volunteers, trustees and anyone else working on CLAPA's behalf.

This policy has been written with particular regard to online platforms that CLAPA may use in its support of the cleft community, including (but not limited to) the CLAPA website, X/Twitter, Facebook, Instagram, WhatsApp, Zoom and e-newsletters.

## Responsibility

The Chief Executive has overall responsibility for ensuring the safety (including online safety) of all involved with CLAPA.

Details of staff responsible for on-line safety in CLAPA can be found on [CLAPA's website](#) alongside the accountability of their roles.

## Online Safety Code of Conduct

We expect CLAPA staff to agree to the Online Safety Code of Conduct set out below:

1. Use the internet and other forms of communication in a sensible and polite way
2. Only access websites, send messages or access and use other resources that will not hurt or upset anybody
3. Seek permission from service users or their person of legal parental responsibility, if they want to use personal information or take photographs of them
4. Report any concerns to the Safeguarding Lead or Deputy
5. Disclose concerns about the welfare of a child, young person or adult at risk, on a need to know basis
6. Follow the guidance set out in CLAPA's Social Media Policy

CLAPA uses WhatsApp for communication between staff, volunteers and patient representatives. CLAPA will always be clear about the purpose of each WhatsApp group and will seek consent from individuals in advance, before adding them to a group. Only individuals that have signed CLAPA's Code of Conduct will be permitted to join WhatsApp groups. Only CLAPA staff members are authorised to perform the role of group administrator. To ensure that only the group administrator can add members to the group, they must disable the 'add other members' option in the group permission settings.

Where communications fall below the high standards of expectation set out in the above Online Safety Code of Conduct then CLAPA staff will liaise with those individuals and reserve the right to remove

members at any time and without notice. Member will also be removed from the group if they cease involvement with the activity that the group has been set up to support.

## Online risks

There are many potential risks of harm to children, young people and adults at risks. These include:

- accessing inappropriate or illegal websites
- receiving unwanted or upsetting e-mails, texts, messages or images
- being “groomed” by another with a view to meeting the child, young person or adult at risk for their own illegal purposes including sex, drugs or crime
- sharing nudes or semi nudes
- viewing or sending unacceptable material such as that inciting hatred or violence
- sending bullying messages or posting malicious details about others
- ignoring copyright law by downloading e.g. music, videos, homework cheat materials, etc.
- overspending on shopping and gambling sites
- being at risk of identity fraud for money transactions
- inappropriate relationships or prostitution
- scams or fraud

### **Signs that a child, young person or adult may be at risk online may include:**

- becoming secretive about where they are going to or who they are meeting
- will not let you see what they are accessing online
- using a webcam in a closed area, away from other people
- accessing the web or using a mobile for long periods and at all hours
- clears the computer history every time they use it
- receives unexpected money or gifts from people you don't know
- does not appear to have the money they should have

### **Signs that a person may be a risk to others online, if they:**

- befriend a child, young person or adult at risk on the internet or by text messaging
- have links to children, young people and/or adults at risk on their social media pages especially if they work in a position of care such as a sports coach or care worker <sup>2</sup> are secretive about what they are doing and who they are meeting

**If any of the above is identified, follow Section 10 of this policy.**

## Social media

The [Online Safety Act 2023](#) and associated government guidance [A Guide to the Online Safety Bill](#) now makes social media companies more responsible for their users' safety on their platforms. This means children and adults will be protected online by making social media platforms:

- remove illegal content quickly or prevent it from appearing in the first place. This includes removing content promoting self-harm
- prevent children from accessing harmful and age-inappropriate content
- enforce age limits and age-checking measures
- ensure the risks and dangers posed to children on the largest social media platforms are more transparent, including by publishing risk assessments
- provide parents and children with clear and accessible ways to report problems online when they do arise

Such content should be reported to the service provider and if they do not respond appropriately the matter can be reported to [Ofcom](#). Please also refer to CLAPA's [social media policy](#).

## Minimising Risks

As appropriate, we will:

- talk to and young people that engage with our services about what they are accessing online and the risks of giving out personal details online.
- talk about how people can be anyone they want to be online, e.g. by using misleading emails, photographs of other people, telling lies about their age, hobbies, school.
- encourage children, young people and adults at risk to think carefully about what photographs or videos they use online. They can be used and tampered with by other people, or they may not be appropriate.
- advise children, young people and adults at risk to only text, chat or webcam to people they know in real life.
- talk about how to identify SPAM messages or junk mail and how to delete them. This also applies to messages from people they do not know, or opening attachments.
- discuss how people hide their identities online and the importance of never meeting new online "friends" in real life.
- make sure children, young people and adults at risk understand they can always talk to us, or their parents and/or carers, about anything that makes them feel uncomfortable.
- look on the internet together for information about how to deal with or report problems. e.g. [The National Crime Agency's CEOP Education](#)
- talk about how/when information or images get on to the internet, they can never be erased.
- talk about the risks of the misuse of artificial intelligence to alter images.

Useful resources about keeping safe online can be found on the [government](#) and [NSPCC](#) websites. Information about how to report and get help with harmful online content can be found on the [Ofcom](#) website.

# Reporting Concerns

If you have any concerns, speak to the Lead or Deputy for Safeguarding.  
Remember:

- do not delay.
- do not investigate.
- seek advice from the Lead or Deputy
- make careful recording of anything you observe or are told

**IT IS IMPORTANT TO FOLLOW APPENDIX 1 (BELOW), FIRST, WHENEVER ANYONE IS AT RISK OF HARM**

## Appendix 1- Online Safety Referral Flowchart – Child and Adult

