



Outcomes
First Group

STAYING SAFE ONLINE

Group Policy

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1.0 Purpose

Outcomes First Group places the safety of the children and adults we support as its highest priority. The purpose of this document is to set out the Group's policy for online safety and provide guidance to help keep the people we educate and care for safe online and when using digital devices.

2.0 Policy Statement

The Group is committed to keeping the children, young people and adults we support, educate and care for safe, whilst enabling them to enjoy their lives and have the same opportunities to explore the world as others.

Technology is part of everyday life for children and adults; it directly or indirectly affects almost every aspect of life. This provides many possibilities, including tools for learning, socialising, playing and helping people find their place in the world. However, it also carries significant risks to which those we support can be more susceptible than their peers. Those already at risk offline are more likely to be at risk online.

Raising awareness of the potential risks and helping them to understand what they can do to keep themselves safe is essential for their well-being. Having regular conversations, understanding what they are using the internet for and assuring them there is a trusted adult they can talk to if anything upsets them online, will help to keep them safe.

Those working with children, young people and vulnerable adults are expected to support them to develop the skills they need to use the internet and social media safely for learning and enjoyment. Team members must keep children, young people and adults in their care as safe in the online world as in the real world.

Terminology - please note that the terms "our teams" and "team member/s" include everyone working with the people in Outcomes First Group's services in a paid or unpaid capacity, including employees, consultants, agency staff and contractors.

3.0 Legal Framework & Government Guidance

Across the UK, criminal and civil legislation aims to prevent a range of abusive activities online including:

stalking, harassment, improper use of any public communications, sending indecent, offensive, false or threatening communications and sending private sexual photos or videos of another person without their consent.

The UK [Online Safety Act 2023](#) aims to minimise the risks of online harm to children and adults by putting duties on companies that operate online services to make them legally responsible for keeping people, especially children, safe online, which includes assessing risks of harm, and taking steps to address them. This is a very positive step forward to help protect people from online risks, however, as educators and carers of children, young people and vulnerable adults, it is important that team members maintain vigilance in helping those we support to stay safe online.

For further information about the legal duties and how often will ensure companies implement them, please see: [Ofcom - Online Safety](#)

For further information about the legal framework and related information, please see the NSPCC's [Preventing online harm and abuse](#)

Governments of the UK nations have developed further guidance and plans to help keep children safe from online harm and abuse:

[Advice to parents and carers on keeping children safe from abuse and harm](#) - UK Government

[Help for vulnerable people to spot disinformation and boost online safety](#) (DCMS)

[Enhancing digital resilience: An action plan to protect children and young people online](#) - Welsh Government

[Safeguarding Children from Online Abuse](#) - a guide for practitioners working with children in Wales has been produced by the Welsh Safeguarding Boards as part of the [Wales Safeguarding Procedures](#).

[Internet Safety for children and young people: National Action Plan](#) – Scottish Government

4.0 Scope

This policy applies to all services and settings within the Outcomes First Group operating in England, Wales and Scotland. It is applicable to schools, colleges, homes, and any further services provided by the Group.

This policy and guidance document should be read in conjunction with the service's:

- Safeguarding Policy
- Anti-Bullying Policy and Guidance
- Child-on-child Abuse Policy/ Peer-on-peer abuse Policy
- Gaming Devices Policy and Procedure
- Child Exploitation Policy and Guidance
- Protecting Children against Radicalisation Policy
- Photography of Injuries and Medical Conditions Policy
- Use of Images & Audio Recording Policy (Clinical)
- Web-Filtering and Monitoring Policy (Schools)
- Mobile and Smart Technology Policy (Schools)
- Phones & Internet Safety (Children's Homes)

- Social Media Policy

- Safe Caring & Professional Boundaries
- Code of Conduct & Ethics (Group)
- Parent/Carer-School Communications Policy, and
- the Group's Safeguarding Statement and policies on Personal Device Use, Mobile Devices, Password Protection, Information Security, Data Protection and GDPR

For those we support who are non-verbal or have limited receptive and expressive communication and learning disabilities, more direct on-going observation of their technological use to support them is required to keep them safe, along with direct modelling of safe online behaviour by those responsible for their care and education.

5.0 Service specific information

The Group operates a highly secure web filtering system on the internet link to the setting. This means that it safeguards the setting's computers and internet use, and it also offers safeguards on mobile phone and tablets used over the setting's Wi-Fi network. Web filtering and monitoring helps to keep young people safe from illegal content and protect them from extremism online when using the setting's Wi-Fi, it is informed in part, by the risk assessment required by the Prevent Duty. Please note that the Group is not able to apply web filtering protection when devices are used outside of the Group's sites or when using Mobile Data Networks. Please see the *Web-Filtering and Monitoring Policy* for further information.

5.1 Schools and colleges

Digital technology, the internet and related applications provide a wealth of fabulous learning opportunities and have many positive uses in schools and colleges. Their use must be balanced with educating pupils about the risks and helping them to take a responsible and safe approach. Schools and colleges must help and support their pupils and students to recognise and avoid online safety risks and to develop their digital resilience. Pupils and students that have limited receptive and expressive communication and learning disabilities, will require more direct on-going observation of their technological use to keep them safe.

Childnet provides a range of resources to support online safety for teachers: [Help, advice and resources](#)

DFE has published Guidance for schools and colleges on [Harmful online challenges and online hoaxes](#), which includes advice on responding appropriately to incidents involving harmful online challenges and online hoaxes, preparing for future online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

Online safety should be covered in detail as part of the PSHE (Personal, Social, Health & Economic)/PSE (Personal and Social Education) curriculum in schools.

Schools and colleges are expected to meet the DFE's [Filtering and monitoring standards for schools and colleges](#) Please see the *Web filtering and Monitoring Policy* for further details.

Each school also has a *Mobile and Smart Technology Policy*. Information about standards schools and colleges should meet on cyber security, user accounts and data protection can be found here: [Cyber security standards for schools and colleges](#)

The school will carry out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks children face. Free online safety self-review tools for schools can be found at <https://360safe.org.uk/> and [LGfL online safety audit](#)

Schools and colleges are encouraged to use the regular communications they have with parents and carers to reinforce the importance of children being safe online and keep them informed about what systems schools and colleges use to filter and monitor online use, what their children are being asked to do online at school or college, including the sites they will be asked to access, and be clear who from the school or college (if anyone) their child is going to be interacting with online.

5.2 Residential Care

Those caring for and supporting children and adults in residential settings play a vital role in helping to keep them safe in the offline and online worlds.

The UK Safer Internet Centre provides advice, information and links to toolkits to help keep those in residential settings safe online. Please go to the following websites to access these resources:

[UK Safer Internet Centre - Guides and Resources for Residential Care Settings](#)

[UK Safer Internet Centre Guides and Resources Supporting Vulnerable Groups Online](#)

Care Management Group and CHANGE have developed an easy read guide for people with learning disabilities: [Keeping Safe Online](#)

6.0 Guidance

The rapid rate of technological development and change can leave many adults overwhelmed and not sure where to start. However, online safety does not require high levels of technical expertise, it requires awareness of the potential risks and an understanding of the steps that can be taken to help keep the children, young people and adults we support safe.

There are many excellent resources available to help, which this guidance provides signposting to. The Group also provides training and support for team members on this subject. Please visit the Group's Learning Management System for the latest training available.

7.0 Understanding the Risks

Many of the main risks are highlighted below. However, technology and its risks advance rapidly. There are many websites that can be accessed to maintain awareness and keep in touch with the latest developments. Some are referenced within the guidance and further links are included in the 'Helpful Resources' section.

The potential risks from internet use can be classified under the following headings:

- Content: being exposed to illegal, inappropriate or harmful material;
 - Contact: being subjected to harmful online interaction with other users; and
 - Conduct: personal online behaviour that increases the likelihood of, or causes, harm.
 - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- (Please report phishing emails to the Anti-Phishing Working Group (<https://apwg.org/>))

7.1 Harmful Content and Online Groups

Harmful content is anything that causes distress to the person viewing it. Sometimes when using the internet people unintentionally come across content that is harmful or upsetting. False information and fake news can also be a cause of distress.

There are many positive groups and forums online that can be very helpful. However, there are also groups that promote harmful behaviours such as anorexia, suicide, self-harm, substance abuse and radicalisation. It is important to be aware of what the children, young people and adults we support are doing online and what they are talking about.

The dark web is more difficult to access but is something to be aware of, particularly for those with a keen interest and expertise in computing. It is a section of the internet used for illegal transactions, such as guns, drugs, human trafficking or accessing images of child sexual abuse.

For further information, please see: <https://www.thinkuknow.co.uk/parents/articles/what-is-the-dark-web/>

For information about reporting harmful content, please go to: <https://reportharmfulcontent.com/>

7.2 Cyberbullying

Cyberbullying is bullying using digital technologies. It can take place through social media, messaging, gaming and mobile phones. It is repeated behaviour, aimed at scaring, upsetting or shaming those who are targeted. The bullying can continue when the young person is at home through their digital devices.

The National Bullying helpline has produced a guide for different apps giving detailed steps on how to block or report a bully via some of the most popular social platforms: [National Bullying Helpline - Social Media](#)

7.3 Sharing images and information

The children, young people and adults we support need to develop an understanding of the potential consequences and permanency of the information they share online. Once information is online it is hard to remove and can be copied and shared. This can provide other people with information about their identity, location and personal interests.

Photographs of individuals the Group educates, cares for or supports must not be posted online or on social media by team members. Children should be strongly discouraged from doing this as they could place themselves at risk of harm. If photographs need to be sent by email, this should be done securely. Personal emailing of photographs of those we support is not allowed.

Please see [Indecent images of children: Guidance for young people](#) for further information, and the Group's Photography of Injuries and Medical Conditions Policy

7.4 Sexting

Sexting describes the sending and receiving of sexually explicit or provocative images via text, email, messaging or on social networking sites. This can lead to negative comments and bullying that can make the individual more vulnerable to exploitation and blackmail.

Images can spread quickly over the internet and through social media, which can affect the person's reputation and cause emotional distress. It could also affect their lives in the future, e.g., when applying for a job.

Taking, making, sharing and possessing indecent images and pseudo-photographs of people under 18 is illegal. A pseudo-photograph is an image made by computer-graphics or otherwise which appears to be a photograph. This can include: photos, videos, tracings and derivatives of a photograph and data that can be converted into a photograph.

7.5 Grooming

Grooming is when someone develops an emotional connection with an individual to gain their trust for the purpose of abuse, exploitation, radicalisation or trafficking. This can happen offline or online. The online world makes it easier for people to remain anonymous and create an image of themselves that may not be true.

7.6 Smartphone Apps and Gaming

Smartphone apps are gradually taking over traditional web browsing and online gaming, with thousands available to download. Most are safe to use, however, some carry age restrictions or are unsuitable for youngsters. Apps can be easily exploited by online criminals, who can contact children, young people and adults at risk through the interface or access their personal information and data, including their location.

It is important to be aware of the apps the people in our care are downloading to their phone or tablet; its suitability needs to be checked to make sure they are not unwittingly sharing private data with cybercriminals or doing something that will cause them distress.

Team members in residential settings should ensure that children and adults who enjoy gaming activities do so in a healthy way. Gaming can be addictive. Excessive gaming can contribute to a sedentary lifestyle and have an adverse impact on emotional and physical health. Appropriate boundaries in this regard should be outlined in care planning and risk assessment documentation.

Any concerns about the effect of gaming on children's mental health and wellbeing should be reported to the DSL. Please also see the Group's *Gaming Devices Best Practice Guidance*.

7.7 Child Exploitation

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. This happens both offline and online.

Online Grooming describes the process of developing a friendship or relationship with a child online, with the intention of abusing or exploiting them, and can include sexual or criminal exploitation as well as extremism. Offenders may use social networks, online games or live streaming sites to identify and communicate with young people.

Online abuse and exploitation can:

- Occur through online chats, pictures, videos or webcams and the young person may never physically meet their abuser
- Begin online then move offline
- Be perpetrated by individuals or groups, males or females, other children or adults
- Be a one-off or a series of incidents over time.

In cases of online sexual exploitation, young people may be persuaded or forced to:

- Send or post sexually explicit images of themselves.
- Take part in sexual activities via a webcam or smartphone.
- Have sexual conversations by text or online.
- Abusers may threaten to send images, video or copies of conversations to the young person's friends and family unless they take part in other sexual activity.
- Images or videos may continue to be shared long after the abuse has stopped.

The number of children and young people affected by abuse online is unknown as those subjected to it do not often tell people as they feel ashamed or guilty, they may not know who to tell, or realise they are being abused.

Please read the *Child Exploitation Policy*. If you believe a child is being sexually exploited or at risk of exploitation, please follow the reporting procedures outlined in this policy. Where indecent images of children or other unsuitable material are found, the police and Local Authority Designated Officer or equivalent, must be informed immediately.

It is important to remember that the law allows for disclosure of confidential information necessary to safeguard a child if there are reasons to believe that a child is experiencing or at risk of suffering significant harm.

The Child Exploitation and Online Protection Command (CEOP) website [thinkuknow](https://thinkuknow.org.uk/) has a range of helpful resources, including tools and activities for children of different ages, a section for professionals working with children and young people, and a parent/carer section.

7.8 Online Scams (Phishing, SMishing, Vishing)

Scammers target people through mobile phones via text, email or through a phone call. They are usually trying to obtain personal details to enable them to steal money. Being aware of the various methods they use to try and trick people into giving them information will help reduce the risk of becoming a victim of a scam.

Some of the common ways they try to extract information are:

- Phishing - when a scam is sent via email, usually asking you to click on a link.
- SMishing - when a scammer sends a message to text.
- Vishing - a voice call scam over a phone.

For further information and advice please go to: [Safe Search kids](#)

It is also important to discuss the risks of buying goods online and checking websites are genuine and secure to help prevent young people and vulnerable adults being scammed or inadvertently buying counterfeit goods.

7.9 Additional risks for looked after children

There can be additional risks for looked after children that team members need to be aware of and be equipped to deal with. These can include:

- Unregulated contact from birth family members - contact arrangements must be in line with any agreement that has been made as part of the child's care plan. If contact is not allowed offline, the same applies online.
- Bullying - children in care are sometimes seen as, or feel 'different' to their peers, and this may place them at an added risk of both bullying and cyberbullying.

8.0 How to help children, young people and adults we support stay safe

8.1 Managing Access

For the children, young people and adults we support, access to the internet and digital devices will be subject to the care planning and review process and will be risk assessed, in agreement with the local authority and family (where appropriate), to help keep them safe in the online world.

An E-safety agreement must also be completed for each person supported in residential care.

Acorn Digital Learning has developed a number of useful documents, including a risk assessment and Online/Remote Learning Policy that schools may find helpful to adapt for their settings.

Please email: acorndigitallearning@ofgl.uk for further information.

8.2 Setting Boundaries

Setting boundaries helps the children and adults we support to know what is acceptable and help them to feel safe and stay safe. This could include planning what time of day online activity is allowed and how long for, having rules in place such as, no devices after bedtime and only using devices in communal areas.

Remind children, young people and adults we support that no matter how many times they have been in contact with someone online, if they do not know them in the real world, they are strangers, they may not be who they say they are. It is not safe to give them personal details or arrange to meet them.

8.3 Maintaining professional boundaries

Team members must maintain professional boundaries both inside and outside of working hours with children and adults who are currently, and have previously, attended the Group's services. For example, team members should not accept friend requests from the children or adults they educate, support or care.

Any on-going contact arrangements with children or adults who have left the Group's services or settings must be managed professionally and sensitively and in a way that protects the child/young person and the team member.

Please see the Group's Code of Conduct & Ethics and Safe Caring & Professional Boundaries Policy.

8.4 Communication and Involvement

Communicating with children and those who may be at risk, to understand how they are using the internet and social media will help them to stay safe. It is important that they know they can talk to or notify a trusted adult if something concerning happens online, even if it is something they feel embarrassed about.

For those who are non-verbal or have limited receptive and expressive communication, arrangements for direct observation of their technological use is required to keep them safe. This should be written in their care plan and risk assessment and must be specific to their individual needs to mitigate the risks, it should not be a blanket approach of restriction. Direct modelling of safe online behaviour by those providing care and education is also important.

8.5 Starting a conversation about online safety

It can be difficult to know how to start a conversation about online use. The NSPCC and Childnet have provided some helpful suggestions. Please visit their websites:

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/talking-child-online-safety/>

<https://www.childnet.com/parents-and-carers/have-a-conversation>

Emphasising the need to be respectful of other people and only posting and sending friendly messages and content is also important. Children and young people might not realise the impact of comments they make online. It can be helpful to use the THINK acronym before posting anything: "Is it True, Helpful, Inspiring, Necessary, Kind?"

Guidance on what to do if you find out a child we support is cyberbullying others is available here:

<https://www.internetmatters.org/hub/expert-opinion/help-my-child-is-the-cyberbully/>

8.6 Security and Privacy Controls

Setting controls on devices is an effective way to reduce risk; they can block or filter upsetting or inappropriate content, and control purchases and activity within apps. Parental control software can be installed on phones, tablets, games consoles, laptops and computers. The following websites provide advice on how to do this: [NSPCC Online Safety Parental-controls](#), [Internetmatters.org - Parental Controls](#) and [Digital Parenting Pro](#) give helpful information and advice about available parental controls and safety settings across devices and popular apps, games and social media.

Most devices and apps have 'geo-location' options. If this is enabled, it could be sharing the user's location with strangers. This can usually be disabled easily in the device settings.

Where there is an option to do so, the "Friends only" setting should be applied; people set as 'Friends' should be people they know or trust in the real world. Some apps let people tag others in images and comments, which can result in children being unwittingly tagged into offensive online content. Check tagging settings in social accounts to make sure they cannot be identified by others after being tagged.

Apps and devices should be kept up-to-date. If the manufacturer provides an update, they should be installed as soon as possible, as they often include better security provision or offer enhanced protection against malware.

Children and young people are often more tech savvy than most adults, so it is important to keep communicating with them about this and regularly check what apps and social media they are using and the privacy controls. They may know how to alter privacy controls and settings, so it is important to maintain an awareness of their online activity.

Passwords are useful tools to help keep digital devices and sensitive information safe. When choosing your password, ensure it is not easily guessable (e.g., avoid using names of family members, pets or references to memorable dates). Ideally a long password, with a combination of upper and lower-case letters, numbers and symbols should be chosen. Usernames and passwords should not be written down.

9.0 Responding and Reporting

If you have reason to believe that a child, young person or adult we support is experiencing harm or is at risk of harm, the reporting process set out in the Safeguarding Policy must be followed immediately.

If a team member becomes aware of an online incident that is a cause for concern, they should:

- Provide reassurance to the child or adult
- Take immediate action to report any criminal offences to the police and social care
- Inform the child or adult's placing authority and family as appropriate
- Review the supervision and support arrangements for the young person/adult accessing the internet.
- Check the privacy and security settings on the person's devices and account.
- Agree what action will be taken to prevent recurrence and reduce risk, the risk assessment should be reviewed and updated. Consideration of educating young people and adults on internet safety matters should be included.

In Homes and residential care - The concern or incident must be reported to the Safeguarding lead/Registered Manager and recorded on Home's Electronic Recording System and an email sent to safeguarding@ofgl.co.uk to notify the Director of Safeguarding/ Safeguarding Adviser. Please also see the setting's Safeguarding Policy.

In schools and colleges – team members report any such concerns or incidents to their DSL immediately. The incident must also be recorded on the Electronic Recording System and an email sent to safeguarding@ofgl.co.uk to notify the Director of Safeguarding/ Safeguarding Adviser. Please also see the Safeguarding Policy.

Team members are advised to always report any concern or worry straight away, rather than waiting to see

if the matter develops. If you are unsure about what action to take or need help or advice you should speak to the DSL/Safeguarding Lead, your Line Manager or the Headteacher/Principal/Registered Manager, as appropriate. Team members can also contact the Director of Safeguarding/Safeguarding Adviser for advice.

External bodies where concerns can be reported to are:

CEOP: www.ceop.gov.uk www.thinkuknow.co.uk

Internet Watch Foundation: www.iwf.org.uk

Action Fraud to report fraud and internet crime: <https://www.actionfraud.police.uk/>

10.0 Procedures

Online activity and digital use should be monitored and managed through appropriate supervision, risk assessments, as part of the care planning process, and ongoing review.

For the children and adults we support in residential care that require direct monitoring and intervention, this must be clearly written into their care plan and risk assessment, explaining how this meets their individual needs to help keep them safe online.

11.0 Helpful Resources

In addition to the websites mentioned in this document, the following links also provide helpful information:

[NSPCC Keeping Children Safe Online Safety](#)

[NSPCC Online Safety Families Children with Send](#)

[Social Media Guidance for parents and carers](#)

[Cerebra - Learning Disabilities, Autism and Internet Safety](#)

[UKCIS \(UK Council for Internet Safety\)](#)

[Star Send toolkit](#)

[Ambitious about Autism - Online safety information](#)

[Stop It Now! \(UK and Ireland\)](#)

[Child Protection Scotland - Online Abuse](#)

[Swgfl.org.uk Artificial Intelligence](#) and [Swgfl.org.uk Synthetic media \(Deepfakes\)](#)



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