



Team Domenica Online Safety Policy

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Associated Documents

- *Team Domenica Policy for Admissions, Attendance and End of Placements*
- *Team Domenica Policy for the Promotion of Positive Behaviour and Relationships*
- *Team Domenica Safeguarding Policy*

Sources of information and support

- [UK Safer Internet Centre](#)
- [UK Council for Internet Safety](#)
- [The National Grid for Learning: Safeguarding](#)
- [Common Sense Media: Age-Based Media Reviews for Families](#)

Team Domenica is a social enterprise charity. Our vision is for people with learning disabilities to be valued in the workplace, to reach their full potential and be included as members of society.

Team Domenica is a company limited by guarantee and a charity registered in England and Wales. Registered address: 5-7 Preston Road, Brighton, BN1 4QE | Charity no: 1165494 | Company no: 9862696
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Information and Communication Technology (ICT), including the Internet, is used at Team Domenica to raise educational standards, promote participation in wider communities, support the professional work of staff and to enhance the management functions.

However, access to ICT equipment and to the Internet must be viewed as a responsibility; and systems in place that ensure everybody uses them appropriately and practises good online safety.

This policy also makes it clear that staff have a responsibility not only to supervise, support and educate Team Domenica's candidates, but to manage their own online presence and activities responsibly in and out work.

Introduction

Information and Communication Technology (ICT), including the Internet, is used at Team Domenica to raise educational standards, promote participation in wider communities, support the professional work of staff and to enhance the management functions. We recognise that Information and Computing Technologies are significant tools for learning and communication that can be used to enhance the curriculum, widen access, support creativity and foster independence. A proactive engagement with the opportunities for personalised and differentiated learning, and connectivity with a range of communities can be transformative for all learners. However, access to ICT equipment and to the Internet must be viewed as a responsibility; and systems in place that ensure everybody uses them appropriately and practises good online safety.

It is important that all staff and candidates are aware of the dangers of using the Internet and how they should conduct themselves online. We use the term "online safety" rather than e-safety or cyber safety to ensure the emphasis is on maintaining standards of behaviour and attitudes that are sustainable and transferable across settings rather than tied to thinking about technology or equipment. Any risks are as a result of poor or ill-informed choices rather than related to the technology itself. Online safety covers the Internet, but it also covers mobile phones and other electronic communications technologies.

We recognise that some adults and young people will use these technologies to harm vulnerable people. The harm might range from sending hurtful or abusive texts and emails, to grooming others to engage in sexually harmful conversations or actions online, or in real life; harm can also arise through the activities of those promoting extremism or terrorism or seeking to commit fraud and identity crimes.. There is a 'duty of care' for any person working with vulnerable adults and educating all members of the school community on the risks and responsibilities of online safety falls under this duty.

This policy also makes it clear that staff have a responsibility not only to supervise, support and educate Team Domenica's candidates but to manage their own online presence and activities responsibly in and out work. Online safety is a whole-organisation issue and responsibility, and this includes visitors to the school. Online bullying by anyone will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures, which are outlined in our Policy for Promoting Positive Behaviours and Relationships.

It is an essential part of the work of Team Domenica that while staff take their duties to supervise and support seriously, this balanced with the need for our candidates, all aged nineteen and above, to develop agency and accountability in appropriate decision making about how they use the internet.

Teachers and Training Mentors should teach and promote legal boundaries and safe practice, inform candidates of risks and explicitly teach critical thinking skills, beyond this candidates need to explore and experience the online world for themselves and take managed risks.

Responsibilities

All staff at Team Domenica, whether they are directly engaged with the education and training of candidates or not, are personally responsible for managing their own conduct in relation to all aspects of safeguarding including working to the standards set out in this policy.

All staff are also responsible for supporting candidates, their colleagues, as well as visitors and volunteers to always follow this policy.

It is the **responsibility of all staff to know when an online issue has become a safeguarding concern** and report this concern to the Designated Safeguarding Lead and/or Deputy Designated Safeguarding Leads as outlined in The Team Domenica Safeguarding Policy.

The Senior Leadership Team of Team Domenica is responsible for ensuring that:



Access to induction, training and support in online safety practices for all users.



Appropriate action is taken in all cases of misuse.



Internet filtering methods are appropriate, effective and reasonable.



All personal data is managed securely.



ICT system is reviewed regularly with regard to security and that virus protection is installed and updated regularly.



Appropriate safeguarding measures take place in response to any incidents of harm.

Online risks

Team Domenica is working with candidates who need support for their learning, as defined in their individual education, health and care plans. This often means that processing new information, transferring skills and knowledge across settings and ascertaining the intent of others can be challenging and, therefore it is clear that all of the below risks are applicable to our candidates:

1. Unplanned contact with an unsafe person known to them who may mean them harm
2. Unplanned contact with an unsafe person known to them who may not mean them harm but who may unintentionally cause emotional distress
3. Engaging in harmful or exploitative sexual behaviours
4. Becoming the victim of online bullying by those known to them
5. Becoming the victim of online bullying by those unknown to them
6. Being rejected by friendship/ peer groups due to immature social skills
7. Sexting: receiving inappropriate images
8. Sexting: sending inappropriate images and risking criminalization
9. Invasion of privacy
10. Identity theft
11. Theft through fraudulent payment systems or scams online , including cryptocurrencies
12. Theft through insecure password protection
13. Being hacked and losing control of personal data
14. Leaving personal information on devices which are sold or swapped
15. Excessive spending on "in app" and gaming purchases
16. Criminalization through intentional/unintentional illegal downloading/file sharing
17. Exposure to inappropriate images, including those that lead to distressing thoughts (and increased potential for self-harm)
18. Exposure to triggering images that lead to distressing thoughts (and increased potential for self-harm)
19. Exposure to, and possible desensitisation, to physical violence
20. Exposure to, and possible desensitisation, to sexual violence
21. Anxiety due to worrying news stories
22. Opportunity to shop for harmful or illegal items
23. Radicalisation by extremist groups both in the UK and abroad
24. Introduction to gang culture
25. Isolation from groups in real life
26. Limitations on experiential learning and physical activity
27. Physical harm from poor posture or over exposure to screen
28. Physical harm from poor sleep
29. Sensory overload
30. Damage to equipment due to downloading malware or spyware
31. Theft of personal devices
32. Exposure to unhealthy lifestyle sites such as "ProAna" forums and those promoting self-harm
33. Learning about dangerous fads such as those that involve ingesting harmful substance
34. Temptation to join "daredevil" or "pranking " competitions leading to harm or arrest
35. Developing issues around body confidence due to unrealistic images
36. Damaged reputation and reduced job opportunities

We believe that (for all these) the best protective factors are alert, attuned and knowledgeable staff, confident young people equipped to make good choices, a positive and open community and secure technological systems.

Our Online Safety Agreement

At the beginning of each term, every group of candidates revises the agreement below and places a poster-sized version on the wall. This is signed by all users. Individuals may be asked to resign the agreement and are warned that they could lose the right to use Team Domenica's facilities. Persistent breaches involving bullying, discrimination or the access to harmful or inappropriate imagery could lead to end of placement procedures (as outlined in the Team Domenica Admissions and Attendance policy).

We respect our peers, staff and our Team Domenica community by:

- Remembering college equipment is here to help us learn and work
- Using all equipment in ways that are sensible and safe
- Keeping food and drink away from equipment
- Tidying away properly
- Looking after equipment
- Sharing equipment
- Coming off equipment when necessary
- Not playing loud or offensive videos or music
- Not putting upsetting pictures on equipment
- Not filming or taking pictures of each other without clear consent Stopping any on-line activity when we are asked to or closing a screen when we are asked to
- Not trying to hide what we are doing
- Remembering the rules and policies are here to help us learn and keep us safe
- Remembering that even on breaks and on our own phones we are in a professional working environment, and not at home
- Learning that some things are illegal and doing them might me we have to talk to the police or leave Team Domenica
- Always remembering that bullying and harassment are never ok at Team Domenica or anywhere else

We respect our own health and wellbeing by:

- Not using a computer or any screen for more than thirty minutes at a time
- Not using headphones on high volume or for longer than 30 minutes
- Sitting in a proper chair at the right height for our backs
- Sitting up with the mouse and keyboard and screen in the right place
- Washing our hands before we use a machine or device and wiping it clean afterwards
- Letting myself use technology to learn new and interesting skills and ideas including college and workplace rules
- Being a responsible user of the college's systems and equipment. If I cannot be responsible I understand I'll need time away from the equipment.
- Using PSHE sessions to learn about keeping myself safe and asking questions about this.
- Keeping my personal information personal and never sharing it
- Not breaking the laws on hacking accounts, sending threatening and offensive messages, inappropriate pictures or trying to download music, films or games
- Knowing that people online are not always who they say they are and I can't trust them
- Not using technology to be unkind to people
- Not searching for things that make me feel worried or upset
- Not playing violent games or accessing other content not appropriate for college
- Speaking to someone that I trust if anything happens online which makes me feel uncomfortable or worried

Working with families and carers

At Parent/Carer information evenings, normally held in the summer holiday preceding enrolment, Team Domenica's expectation about online conduct will be shared with families alongside the Online Safety agreement above.

Team Domenica will use Safer Internet Day in February to update parents on new and emergent risks and provide resources to support families and carers.

Safer Internet Day 2024 is on Tuesday 6th February.









Young people and personal devices

The candidates at Team Domenica will usually carry their own mobile phone and this may make a crucial difference to their capacity to, and success in, accessing work, college and the community independently.

As a provider for young people over 19 years of age Team Domenica needs to ensure that the safety measures it takes are reasonable and proportionate to our tasks of preparing young people for the world of work, wherein they will usually need to take their own responsibility for following both workplace policy and the law.

Policing their personal telephones will usually be detrimental to this learning journey. The following measures are used in combination with each other to maintain safety and well being while fostering each individual's growing capacity for autonomy:

-  Making explicit the boundaries of workplace expectations and the law through pre-admission information, the online safety agreement , discrete teaching opportunities as part of the P/RSHE and during mentoring sessions
-  All staff at Team Domenica modelling appropriate mobile phone usage by no having their devices out during learning and working sessions, keeping perceptible information (wall papers, ring tones etc.) appropriate and ensuring their workplace activity is acceptable, including during break times on site.
-  Not providing the college Wi-Fi code for candidate's personal devices.
-  Working at all times to create an open and vigilant culture so it is not habitual for people to hide their activity for others and individuals are confident to air their worries and challenge activities that are of concern.
-  Using evidence-based risk assessments to quantify concerns around individuals and establishing effective responses to these risks. Evidence may include information received prior to enrolment about historical incidents and vulnerabilities or that gathered via Team Domenica's MyConcern Portal.
-  Ongoing vigilance from all staff based on their knowledge of candidates and professional judgement, for example using “ windows of functioning” style check-ins after breaks and adopting a stance of open enquiry about changes in demeanour, behaviour or arousal.

Sexting and sharing nude pictures

Sexting refers to the sharing of sexual images, videos or messages via mobile phone. It is illegal to do this with anyone under 18 or who was under 18 years old when the image was created.

It is legal for adults to consensually share images between themselves, although there are laws about sharing these images with a third party without clear consent being sought.

Although the cohort at Team Domenica falls into the age where texting is legal, all and every incident that comes to the attention of staff via direct observation, reports from candidates or information from families/carers or other agencies must be treated as a safeguarding incident. **This means an incident report is created on MyConcern** and information is handled in line with government guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(GOV.UK\)](#)

This allows all relevant professionals to ascertain the capacities and vulnerabilities of individuals to consent to such activity and provide targeted support as necessary.

No staff member should be involved in sexting at work and this could lead to disciplinary action. Sexting between staff and candidates whether at work or outside of work is never permitted and is likely to lead to disciplinary action and a report to external safeguarding authorities, including the police.



Helping to protect children, young people and adults wherever they are.

Record and manage the reporting of concerns and access the full suite of safeguarding products.

Trouble logging in?

 support@thesafeguardingcompany.com

 Web Chat

 +44 (0)330 660 0767

[Log into MyConcern](#)

Log In

Please enter your email and password

Email

Password

Log In

[Forgot your password?](#)

Online bullying

The Team Domenica Policy for the Promotion of Positive Behaviour and Relationships outlines the behaviour we consider to be bullying, the signs that staff should look out for and the responses to bullying that we will consider, ranging from restorative practice to the end of placement.

If an incident of bullying, in real life or online, happens during the time that at least one candidate involved is in attendance at Team Domenica (including any work placement or enrichment activity) then it is in scope of that policy.

If an incident occurs outside of our provision we will take a proportionate view, centred on the best interest of the candidates involved.

Incidents that impact on the welfare of the learner, including those that impact on their capacity to attend, learn and thrive, will always be within scope although at times Team Domenica may not take the lead on incidents happening fully outside of our provision.

Any staff member becoming aware of any such incident must fill out an incident for on [MyConcern](#).



Supervision and monitoring (blocking and filtering)

Team Domenica uses Content Control, provided by British Telecom. British Telecom are Members of IWF (Internet Watch Foundation) and CTIRU (Counter Intelligence Internet Referral Unit). Our filtering arrangements are reviewed annually by the Chief Operating Officer and Safeguarding Leads and are monitored via our monthly Safeguarding Meeting, with regards to the following topics:

Gambling	Search Engines	Dating
Drugs	Hate & Self-harm	Obscene & Tasteless
Pornography	Nudity	Social Networking
Weapons & Violence	Fashion & Beauty	File Sharing
Games	Media Streaming	

As an additional measure candidates only use such devices when the screen is visible to staff. Laptop histories are checked regularly to monitor whether an inappropriate searches have been carried out and when, with our small group sizes and learner logs making it possible to identify those involved and take the appropriate steps.

Emergent technology and content

Technology progresses rapidly and new technologies and types of content are emerging all the time. Team Domenica will risk-assess any new technologies before they are allowed into college and will consider any educational benefits that they might have.

The safeguarding team keeps up-to-date with new safeguarding concerns related to technology, via updates via newsletters and networking opportunities local and national agencies and will consider training and intervention as necessary.

We continue to focus on developing staff awareness around the rise in the risk of radicalisation to young people in the city, especially from groups and individuals promoting extreme misogyny, the association between virtual reality and social isolation, and newer forms of online threat involving cyber currencies and NFTs.

Images/video recording - photographs and videos have many important and positive uses at Team Domenica. They can provide very strong evidence of achievement for young people who find writing hard and thus give a solid boost to self-esteem well as being verifiable evidence for our awarding bodies. They are also essential for positive promotion of Team Domenica for fundraising and engagement purposes. However, while images are regularly used for these essential purposes, adults need to be aware of the potential risks. Any image can be taken and/or misused or manipulated for harmful purposes. It is essential that our candidates are fully informed of why their image is needed and how it will be used and stored. Every step should be taken to ensure that no young person is distressed by an act of image making and images are stored and shared safely.

We hold a log of signed consent forms from candidates in a secure place. Due to the variety of settings in which it may be necessary to take images of our candidates, Team Domenica has produced a set of guidelines within which staff can use their professional judgement on the best approach in any given circumstances:

- Our candidates are adults and have the right and capacity to be involved in day-to-day decisions, so it is best practise to ask them if it is okay to take pictures / videos each time you do so and explain why this is happening.
- If there is a plan for images known before the session, such as a special event or assessment activity, a device such as an iPad can be collected in advance from our Preston Road office to better manage this.
- If the need for the image is more spontaneous, or collecting a device is not possible, staff may use their own device to take the image but must remove the images before the end of the working day. Images can be emailed to a Team Domenica account or uploaded to a SharePoint Folder. Images must be then deleted from the device, included from "deleted images" folders. Advice cannot be given in this policy for all makes and types of phone or tablet, but Managers can support individuals with safe practice.
- All applications used to take and share images must be password protected and the password not saved to the phone.
- In some situations the candidate may wish for their own phone to be used and this is acceptable if the staff member feels confident in handling the phone safely.
- Images must not be shared with a third party unless there is specific consent from the candidate and a valid reason to do so (i.e. awarding body evidence).
- If the employer wishes to take images for their own purposes they should discuss this with the candidate and Team Domenica in advance.

Training, development and professional support

From 2023 all staff members will be required to do the online training provided by the online Educare provision. In addition to the annual safeguarding refresher, inset will include an update based on information provided by professional networks such as the NSPCC CASPAR newsletter, The Safeguarding Network, OFSTED briefings and NATSPEC.



Visitors to Team Domenica

All **professional partners** visiting Team Domenica's own sites will be advised that if they choose to use their personal portable devices on site that this can only be done within the guidelines set out in this policy. For visitors who cannot complete tasks without the use of devices (Consultants, Trainers, Inspectors etc.) this means they will need to be briefed before work commences. The briefing will state:

You are personally responsible for the security of your device at all times; a locked cupboard can be provided if you request.

- If you lose your device, you must tell someone immediately.
- All content accessed by, or viewed by you, during your visit must be related to your professional task
- On no occasion, or for any reason, can content related to pornography, exploitation in any form or political extremism be accessed or viewed while at Team Domenica. If this is observed or picked up by our filter, we have the right to consider making a referral to safeguarding agencies, including the police.

Members of the public visiting Team Domenica and Café Domenica

While it is not practical or, in fact desirable, for café staff to police the activities of all café users, all staff have a broader duty to candidates and the workplace to maintain a pleasant and safe environment for all. This would include taking action in the event of someone overtly viewing harmful materials.

Actions may include:

- Discreetly and politely ask the person to stop the activity
- Moving candidates so that they are protected from viewing the harmful materials
- Seeking support from colleagues, including managers to formulate a more robust plan to challenge the person
- If there is a crime or a threat of immediate harm, consider calling the police



Work placements

Candidates who attend a work placement need support to negotiate the expectations of that placement. As part of planning for any such placement, the staff involved need to:

- i) Ascertain any specific workplace guidance
- ii) Prepare the candidate for these
- iii) Where there is no guidance consideration should be given to how the candidate might experience having different boundaries in different settings, and where possible efforts made to maintain the professional workplace practices of Team Domenica
- iv) Where there is evidence of individual risk then this should be reflected on the risk assessment.

