1. Introduction

1.1 Pagoda Projects Ltd (Pagoda) is committed to ensuring a safe and supportive online environment exists for all staff, participants and partners engaging in Pagoda Projects programmes, events, online outreach and engagement activities. We will not tolerate sexual misconduct, violence or abuse and we will take all reasonable steps to keep our Pagoda community safe. It is also a principle that "we" means all of us, staff, participants and partners. This document is designed to provide Pagoda staff, participants and partners with guidance and a set of procedures to follow to ensure others safety online, particularly with regards to children or vulnerable adults.

1.2 Safeguarding includes but is not limited to:
• Protection from abuse and neglect, including protection from radicalisation
• Promotion of health and development

1.3 This document was written with specific reference to online activities including, but not limited to, interaction on online platforms such as the Pagoda Projects app (the app), the Pagoda Projects Website (the website), Pagoda Projects social media accounts, instant messaging/chat, live videos/webinars and mentoring (online outreach).

1.4 The purpose of this policy is to;

1.4.1 Provide specific guidance for staff, participants and partners interacting via Pagoda's online platforms, events or delivering online outreach and engagement activities.

1.4.2 Set out Pagoda's approach to safeguarding all participants on programmes, as well as students, children, young people and vulnerable adults engaging in online outreach. Pagoda recognises that the success of the Policy will depend on its effective implementation. It will therefore ensure the effective dissemination of this Policy within the organisation and will provide appropriate training for key staff and partners as appropriate.

2. Scope of this Policy

2.1 This policy specifically relates to interaction by anyone engaging in Pagoda-led activities on the Pagoda's app and website, including live and recorded events as well as online outreach and engagement activities. This policy should be read alongside Pagoda Projects other policies (see Clause 6).

2.2 In the event that the Pagoda-led activity is hosted by another organisation within their own facilities, the host organisation's Safeguarding Policy and related procedures will normally take precedence, but members of Pagoda engaging in those programmes must also take note of, and act in accordance with Pagoda's Safeguarding Policy to the extent that this is possible in the particular circumstances.

3. Definitions

3.1 Abuse: Behaviour towards a person that either deliberately or unknowingly causes a person harm, or endangers their life or their human or civil rights. It can be passive, e.g. failing to take action to care for someone, or failing to raise the alert about abuse; or active, e.g. hitting, stealing or doing something that causes harm. Abuse can be a one-off or something that is repeated.

Abuse falls into a number of categories:
- Physical Abuse such as pushing, shaking, inappropriate restraint, force-feeding, forcible administration of medication, neglect or abandonment;
- Neglect or acts of omission e.g. being left in wet or soiled clothing, or malnutrition; Sexual Abuse;
- Financial Abuse such as exerting improper pressure to sign over money from pensions or savings etc;
- Psychological/emotional Abuse (including the use of text, social networks and email);
- Violation of rights e.g. preventing an individual speaking his/her thoughts and opinions; Exploitation of a person's vulnerability in order to lead them to support terrorism and forms of extremism leading to terrorism;
- Institutional Abuse e.g. failure to provide a choice of meals or failure to ensure privacy or dignity;
- Discriminatory in nature e.g. racial, sexual or religious harassment.

3.2 Online Abuse: Pagoda recognises that all the above forms of abuse can be undertaken using digital technology particularly through Social network sites, tablets and mobile phones.

3.3 Child: References to "child" or "children" in this policy means anyone under the age of 18 years.

3.4 Adult at Risk: Pagoda bases its definition of an "Adult at Risk" as someone over 18 years of age who (i) has needs for care and support; and (ii) is experiencing, or is at risk of, neglect, or physical, mental or emotional harm; and (iii) as a result of those needs is unable to protect themselves against neglect or harm, or the risk of it.

3.5 Safeguarding Children:

We will play our part in:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

3.6 Safeguarding Adults at Risk:

 We will play our part to:

- Ensure that the rights of Adults at Risk are protected to enable them to live in safety, free from abuse and neglect.
- Ensure that the wellbeing of the Adult at Risk is promoted and that in deciding on any action to be taken we will take into account their views, wishes, feelings and beliefs, for example when considering whether to refer concerns to statutory bodies or when seeking support from charitable organisations.

However we recognise that Adults at Risk sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and may not fully appreciate potential risks to their safety or well-being and therefore it may not always be possible to fully defer to their wishes when seeking the best way forward.

3.7 The Community: Reference to a "the Community" includes staff, participants and alumni of Pagoda Projects.

3.8 Staff: References to 'staff' include all paid Pagoda staff whether working on a permanent or temporary contract, apprentices, interns, brand ambassadors or engaged as "third party contract staff" working directly for Pagoda.

3.9 Participant: References to "participants" includes all students and recent graduates currently registered on a Pagoda Programme.

3.10 Volunteer: "Volunteers" are generally Pagoda partners or alumni but may include other associated persons volunteering to lead or support Pagoda-led activities for which they are not paid.

3.11 Pagoda Programme: "Pagoda Programmes" may include but are not limited to online courses, events, internships and study tours, as well as in-person travel programmes.

4. Action

4.1 Responding to an allegation
Any suspicion, allegation or incident of abuse must be reported via the complaints procedure (compaints@pagodaprojects.com) as soon as possible.

4.2 If after careful assessment the Designated Safeguarding Person considers that there is reasonable cause to suspect abuse of a participant, child or vulnerable adult they must, as a matter of urgency, discuss the matter with the relevant University Welfare Contact, Social Services Manager, Safeguarding Adults Team, police PREVENT contact, Channel Co-ordinator or Duty Social Worker to determine whether it is a safeguarding matter. If it is agreed to be a Safeguarding matter a written record of the date and time of the report should be made and the report must include the name and position of the person to whom the matter is reported.

4.3 The Designated Safeguarding Person should discuss with the relevant parties what action should be taken, if any, on the part of Pagoda Projects. A note of that conversation should be made.

4.4 Written records
The Designated Safeguarding Person will retain a copy of the report; any notes, memoranda or correspondence dealing with the matter; and any other relevant material. Copies of reports, notes etc. should be kept secure at all times. The member of staff who has cause for concern should make a full record as soon as possible. The record should include the nature of the allegation and any other relevant information including:
• Date, time and place where the alleged abuse occurred;
• Names of others involved;
• Name of the complainant and, where different, the name of the person who has allegedly been abused; nature of the alleged abuse;
• Description of any injuries/incidents observed; and the account which has been given of the allegation
A copy of all documentation is to be held centrally.

5. Guidelines for Staff

5.1 This procedure must be followed whenever any member of staff hears an allegation that abuse has, or may have, occurred or where there is a significant concern that there may be such abuse.

• Listen to what is said;
• Accept what you are told – you do not need to decide whether or not it is true; and

• Listen without displaying shock or disbelief.
• Reassure the person reporting their concern;
• Do not promise confidentiality;
• Do not promise that "everything will be alright now" (it might not be).
• Respond to the person reporting but do not interrogate;
• Avoid leading questions but ask open ended ones;
• Clarify anything you do not understand;
• Explain what you will do next, i.e. inform a Designated Person
• Make notes as soon as possible – during the interview if you can
• Use the person's own words – do not assume – ask, e.g. "Please tell me what xxxxx means".
• Include: time date place.
• Describe observable behaviour and appearance
• Cross out mistakes – do not use correction fluid
• Do not destroy your original notes – they may be needed later on and must be given to the Designated Person.
• Consider what support is needed for the participant– you may need to give them a lot of your time or they may need to be referred to eternal services for counselling;
• Ensure you are supported – such interviews can be extremely stressful and time consuming;
• Once reported to them the Designated Person will take responsibility for the matter and will take all of the necessary actions. However if you have questions or need additional support then ask.

5.2 Responsibilities
All members of staff have a responsibility to be aware of this policy and to report any suspicions that they might have concerning online abuse.

6. Promoting a Culture of Online Safety

6.1 Pagoda Programmes will seek to educate participants to identify the risks technology can present, and help them develop the skills they need to safeguard themselves. Online safety risks within the Pagoda Community can be broadly mapped across four areas:

6.1.1 Contact: Which may be unwelcome or inappropriate, including grooming or sexual contact

6.1.2 Commerce: Illegal activity such as phishing or identity theft

6.1.3 Content: This could include inappropriate or illegal content, material that incites racial hatred, condones and encourages support for terrorism and forms of extremism leading to terrorism or criminally obscene content. It also includes the inappropriate public posting of material. This may apply to staff equally as to participants, and may include the inappropriate

and potentially unsafe posting of personal data, or the posting of material that brings the individual or the provider into disrepute or impacts upon their business.

6.1.4 Conduct: Includes activities carried out against participants and also those carried out by participants. This category includes anti-social or illegal behaviour, and the ranges of behaviours and activities that make up cyber bullying.

6.2 Content Moderation Tools will be used effectively to manage and monitor the use of language and content on the app. Incident reports will be flagged via the app or via the internal Extra Support system to Pagoda senior management. All staff have the responsibility of educating participants in their care about safe internet practice, including the reporting of any unsuitable material that finds its way through the app's safety filter.

6.3 Online safety Induction
Online safety is also covered as part of the staff induction procedure.

7. Areas of Risk

7.1 Risk Assessment
Some key risks in online activities are highlighted below. Risk assessments for online activities should be shared with all members of staff involved in the online activity.

7.2 IT Safety and Data Protection
The below considerations are highlighted in line with GDPR and IT safety.

7.2.1 A Privacy notice for the given activity should be provided in advance of the activity, easily accessible and provided in language that the participants can understand and are thus fairly informed.

7.2.2 Data protection best practice for any data gathered and stored should be considered in advance of the activity. Data protection should be considered at all stages of design ensuring the approach mitigates the risk to individual participants' information.

7.2.3 The appropriateness of the platform and how they store, process and use personal data should be considered in deciding on an appropriate platform for delivery of the online activity.

7.2.4 For assistance in compliance with Data Protection Regulations, please contact the Data Protection Officer (clare.harding@pagodaprojects.com)

7.3 Social Media

7.3.1 Staff must not engage or communicate with participants, children or children's families via personal or non-Pagoda-authorised accounts – all communications should come from an official Pagoda email, the app, Whatsapp account or other official social media account. Any exceptions to this rule will be pre-approved and risk assessed by Pagoda, for example in necessary cases for emergency contacts or group chats in WeChat or Whatsapp for safety purposes.

7.3.2 For all activities, online or face-to-face, consent should be sought from participants over 18 OR from the parents/carers and the child/young person before posting any identifiable information and/or images of children and young people on social media.

7.3.3 Concerns about social media content or posts involving participants, children and young people such as cyberbullying, self-harm, abuse or exploitations should be raised in line with the process in the [bullying and harassment procedure](#) and [complaints policies](#).

7.3.5 Staff, Partners and Volunteers working on online outreach and engagement should not use social media in a way which would breach other Pagoda policies.

7.4 Live Activities and Streaming
The measures below are as much about protecting Pagoda staff and partners leading programmes, online events and outreach activities, as they are about supporting participants, children and young people engaging in these. Live streaming is not always the best way of delivering an outreach activity. Consider the alternatives and document the reasons for choosing live streaming for the individual activity. However, it is recognised that sometimes there will be reasons for choosing a live platform, such as building a sense of community/belonging amongst a particular group.

7.4.1 Where live streaming is deemed the best platform for delivery, ensure a risk assessment has been carried out ahead of the activity and is shared with all involved.

7.4.2 Any online activities should only be delivered via online platforms approved for use by Pagoda.

7.4.3 Access to the individual platform should only be enabled for the intended participants.

7.4.4 The platform should enable the presenter to control microphones/cameras for participants.

7.4.5 Staff delivering activities should not use their own laptop or device to engage with participants or young people.

7.4.6 Personal accounts for platforms such as Zoom, Teams and Skype should not be used to engage with young people, all activities should be organised through official Pagoda accounts.

7.4.7 Personal information (including names, contact details and email addresses) should only be accessible to those with the right permissions and should not be publicly viewable.

7.4.8 Staff must never give out personal details to participants such as personal email address, personal phone number or social media accounts. Except in certain cases as outlined in 3.3.1.

7.4.9 Staff facilitating activities and monitoring any enabled chat should be able to remove people from the platform if necessary.

7.4.10 For all live activities, it is recommended there is at least one member of staff presenting and another present and monitoring any messages on the platform. Particularly for activities with children or young people under the age of 18, at least two members of staff should be present to supervise the activity. It is recommended that at least one of these have a DBS check.

7.4.11 During a live session, staff or students organising it should:

• Ensure that the session is taking place in a neutral area where nothing personal can be seen and there is nothing inappropriate in the background
• Monitor interactions (verbal and in live chats) to check it is appropriate and relevant, and to deal with any sudden changes or upsetting developments.

7.4.12 If one staff member leaves the session for any reason (e.g. connection issues), they should get in contact with the other staff member as soon as possible (by phone if necessary) and attempt to re-join the session if possible. If it is not possible to have two members of staff present, then the event should be ended as soon as reasonably possible and this should be communicated to all participants.

7.4.13 At the start, the main speaker should remind participants how to keep themselves safe (as outlined above) in addition to reminding them of the ground rules. This is also a good time to restate any pre-shared privacy notice to participants and particularly important if participants can override any central setting and share their own video.

7.4.14 If Staff, Partners or Volunteers share their screens at any point they must ensure that there is nothing inappropriate on the screens/internet pages/browser history.

7.4.15 Challenging behaviour or inappropriate comments should be dealt with immediately, which may involve muting or removing the offender from the platform.

7.4.16 You should also ensure that the participants:
• Do not share private information about themselves
• Do not respond to contact requests from people they do not know
• Understand who they should contact if they hear anything upsetting or inappropriate

7.4.17 For any interactive live streaming, participants should be warned in advance. In addition, consent should be sought and recorded from parents/guardians of any under-18 participants.

7.4.18 A signed code of conduct should be received from all participants which should include the consequences in the case of inappropriate behaviour.

7.4.19 At the start of a session participants should be reminded of this code of conduct, not to take photographs of the screens or share any images, and how they can report any concerns.

7.4.20 If a safeguarding disclosure is made by a participant, the Pagoda complaints policy should be followed.

8. Disclosure and Barring Service Checks (DBS)

8.1 DBS checks are required for some people involved in online delivery; the requirements for this are outlined in this policy. To carry out a DBS check on somebody working with young people in an online space they must meet this criterion:

8.2 Individuals who monitor the content of internet-based services aimed wholly or mainly for use by children on more than 3 days in a 30 day period.

They must also:
• be able to access and remove content or prevent it from being published
• control who uses the service
• have contact with the children/young people using the service

8.3 In these circumstances Pagoda Projects will request an enhanced DBS certificate for the person's current role, to be applicable for working with children and young people.

9. Key contact details

9.1 For questions, to discuss this policy further or raise a concern, please contact Designated Safeguarding Officer, Clare Harding, by emailing clare.harding@pagodaprojects.com

10. Links to other Pagoda Policies and Procedures
- PSEAH Policy
- Combatting Exploitation & Modern Slavery Policy
- Child Protection Policy
- Privacy Policy
- Complaints and Grievance Policy
- App Terms and Conditions
- Skills Courses Terms of Use

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