

Online Safety Policy and Operating Procedures

Background

Birmingham Museums Trust recognises the opportunities and challenges that digital engagement may bring to those working with children, young people and vulnerable adults. We advocate applying the same principles and standards for interacting with children and adults online as in other areas of practice, and in accordance with Birmingham Museums Trust's Safeguarding Policy and Procedures.

Digital engagement encompasses all the work Birmingham Museums Trust carries out with participants online. These activities are wide ranging and include (but are not limited to):

1. Online school sessions
2. Livestreamed public talks and tours
3. Facilitated co-production and consultation sessions
4. Online chat groups
5. Social media engagement
6. Direct e-communications
7. Film and photography of participants

Platforms for these activities include, Zoom, Microsoft Teams, Facebook Live, YouTube Live amongst others. A detailed list of activity is included in the BMT Online Activity Register.

Online safety is the process of limiting the risks to children, young people and adults when using the internet, digital and mobile technology.

This policy must be read in conjunction with BMT's Safeguarding Policy and Procedures which can be found [here](#)

The purpose of this policy statement

The purpose of this policy statement is to:

- Ensure the safety and wellbeing of children, young people and adults is paramount when adults, young people or children are using the internet, social media or mobile devices.
- Provide staff, volunteers and any freelancers working with Birmingham Museums Trust on online activity with the overarching principles that guide our approach to online safety.
- Ensure that Birmingham Museums Trust operates in line with our organisational values and within the law in terms of how we use online devices.

The policy statement applies to all staff, volunteers, children and young people, vulnerable adults and anyone else involved in Birmingham Museums' activities. It has been developed following guidance provided by the NSPCC.

Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. It is particularly informed by the requirement of the Children Act 1989, which provides a framework for the care and protection of children and young people, and the Children Act 2004 which underpins the Every Child Matters, Change for Children programme, and Working Together to Safeguard Children 2018.

We believe that:

- Children, young people and adults should never experience abuse of any kind.
- Children, young people and adults should be able to use the internet for learning, enjoyment and personal development, but safeguards need to be in place to ensure they are kept safe at all times.

We recognise that:

- The online world provides everyone with many opportunities; however it can also present risks and challenges.
- We have a duty to ensure that all children, young people and adults involved in our organisation are protected from potential harm online, whether or not they are using Birmingham Museums Trust's or their own network and devices.
- All children, young people and adults regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse.
- Working in partnership with children, young people, vulnerable adults, their parents, carers and other agencies is essential in promoting their welfare and in helping them to be responsible in their approach to online safety.

We will seek to keep children, young people and adults safe by:

- Appointing Designated Safeguarding Officers to regularly review Birmingham Museums Trust's online safeguarding policy and ensure the procedures are followed by all those involved in the organisation's online activities.
- Providing clear instructions and guidelines to staff and volunteers on how to behave online, and how to safely run online engagement activities.
- Supporting and encouraging the children, young people and adults engaging in our online activity to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others.
- Supporting and encouraging parents, educators and carers to do what they can to keep those in their care safe online.
- Following clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or a child/young person.
- Reviewing and updating the security of our information systems regularly.
- Ensuring personal information about the children, young people and adults who are involved in our organisation is held securely and managed according to GDPR requirements.

- Ensuring that images and film of children, young people and adults are used only after a consent form has been obtained, and only for the purpose for which consent has been given [BMT Photo Consent Form](#)
- Providing induction, support and training for staff and volunteers about online safety.

If online abuse occurs, we will respond to it by:

- **Following [BMT Safeguarding Procedures](#).** All safeguarding concerns or incidents must first be reported to one of the Designated Safeguarding Officers.
- Providing support and training for all staff and volunteers on dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation.
- Making sure our response takes the needs of the person experiencing abuse, any bystanders, and our organisation as a whole into account.
- Reviewing the online safeguarding policy and guidelines at regular intervals, in order to ensure that any problems have been resolved in the long term.

Online behaviour

In your role at Birmingham Museums you are acting in a position of trust and have a duty of care towards the children, young people and adults we engage with online. You are likely to be seen as a role model or in a position of authority and are expected to act appropriately.

Everyone who works or volunteers for Birmingham Museums Trust must follow the online code of conduct:

DO

- Prioritise the welfare of children, young people and vulnerable adults
- Provide a safe online environment for children, young people and vulnerable adults.
- Ensure IT equipment, including mobile devices, is used safely and for its intended purpose.
- Have good awareness of issues to do with safeguarding and child protection and take action when appropriate. Follow our policies and procedures for safeguarding, whistleblowing and online safety.
- Treat children and young people fairly and without prejudice or discrimination. Understand that children, young people and adults are individuals with individual needs. Respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems, and appreciate that all participants bring something valuable and different to the group/organisation.
- Challenge all unacceptable behaviour, including discrimination and prejudice, and report any breaches of this behaviour code to a Designated Safeguarding Officer.
- Report all concerns about abusive behaviour, following our safeguarding procedures.
- Model good behaviour for children and young people to follow and ensure your contact with children and young people is appropriate and relevant to the work of the project you are involved in.
- Encourage children, young people and adults to speak out about attitudes or behaviour that makes them uncomfortable.
- Consider the long term implications of content posted online, and exercise caution when you are discussing sensitive issues with children, young people or vulnerable adults.

- Promote relationships that are based on openness, honesty, trust and respect. Avoid favouritism and be patient with others.
- Ensure that whenever possible, there is more than one adult present during online activities with children, young people and vulnerable adults. If a situation arises where you are alone with a child, young person or vulnerable adult, for example in virtual session, ensure that you are within sight or hearing of other adults.
- If a child, young person or vulnerable adult specifically asks for or needs some individual time with you, explain that you can talk with them with another adult present, such as their teacher if they are a pupil. Never be alone with child online.
- Respect a person's right to personal privacy as far as possible. If you need to break confidentiality because you are concerned about their welfare, it is important to explain this to them at the earliest opportunity.

DO NOT

- Do not let children, young people or vulnerable adults have your personal contact details (mobile number, email or postal address) or have contact with them via a personal social media account.
- Do not upload or post inappropriate offensive or illegal content on any online space.
- Do not allow concerns or allegations to go unreported.
- Do not take unnecessary risks.
- Do not develop inappropriate relationships with children, young people and vulnerable adults.
- Do not make inappropriate promises to children, young people and vulnerable adults.
- Do not engage in behaviour that is in any way abusive, including having any form of sexual contact with a child, young person or vulnerable adult.
- Do not act in a way that can be perceived as threatening or intrusive, nor patronise or belittle children, young people and vulnerable adults.
- Do not make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children and young people.

You should always follow this code of behaviour and never rely on your reputation or that of Birmingham Museums Trust to protect you. If you have behaved inappropriately you will be subject to our disciplinary procedures. Depending on the seriousness of the situation, you may be asked to leave Birmingham Museums Trust. We may also make a report to statutory agencies such as the police and/or the local authority child protection services. If you become aware of any breaches of this code, you must report them to a Designated Safeguarding Officer.

Operating procedures for safe online engagement

All staff, volunteers and anyone else running online engagement activity for Birmingham Museums Trust must adhere to the following operating procedures:

1. Online school sessions

When running a school workshop on an online platform:

- The member of staff running the session must hold a current DBS check and be Level 2 (or above) trained in Birmingham Museums Trust's safeguarding procedures. They must also be familiar with the Online Safeguarding Policy and operating procedures.
- Any new session types must be approved by your line manager and a Designated Safeguarding Officer, and logged on BMT's Online Activity Register.
- Deliver the session from a Birmingham Museums Trust account, never a personal one.
- Where possible connect to the internet via an Ethernet cable rather than Wifi.
- Password protect the platform so only those with passwords can enter.
- Lock sessions once they begin to lower the risk of others gaining entry to sessions.
- Allow only Birmingham Museums Trust staff to share screens (not students).
- Ensure that there is always a schoolteacher or other member of teaching staff present in a session.
- Restrict chat functions on platforms where possible so that private conversations are not possible.
- Disable the ability for anyone to join a session before Birmingham Museums Trust staff.
- Ensure that sessions are streamed from a suitable room. Where possible we will use virtual backgrounds or white walls with good lighting to ensure students are able to concentrate on the facilitator and don't see personal items of the facilitator.
- Staff will be professionally dressed with the camera kept at eye height.
- Do not take or share any photos or videos of the sessions without a signed consent form (see below)
- Do not record any sessions.
- Share the Online Safety Policy, these guidelines and the risk assessment for the session with the lead educator in advance, as well as how to access the session and what to expect.
- Mute all participants when they are not required to speak to ensure the smooth running of the session.
- Support teachers in managing the behaviour of their students. If needed, suggest taking a break to allow the teacher to resolve a situation and let the teacher know we will mute the class to allow privacy.

2. Live streamed public talks and tours

Online public events may include live streamed talks, tours, shows and/or demonstrations. The guidelines for online school sessions apply with the additional consideration to public behaviour:

- Must always be two running the session, one of whom must be Level 2 (or above) trained in Birmingham Museums Trust's safeguarding procedures. They must also be familiar with the Online Safeguarding Policy and operating procedures.
- Any new session types must be approved by your line manager and Designated Safeguarding Officer, and logged on BMT's Online Activity Register.
- DBS checks are required for all staff delivering public talks and tours that are considered regulated activity as defined in the [BMT Safeguarding Policy](#)
- Mute all viewers on arrival to the session and outline the use of the chat function. The presenter will make sure viewers know when questions will be answered i.e. at set intervals, at the end etc.
- Know in advance how to eliminate one of the participants.
- Know how to disable someone's camera, and to mute participants.

- Know how to prevent GIFs and other files and images from being added to the chat.
- Manage who can chat.
- If a member of the public becomes abusive or aggressive, remove them from the session and immediately delete any offensive chat.
- For large scale live streamed events, ask another member of staff to take on the role of managing the chat, mute and camera functions of the participants if these are active.
- Must be webinar technology not Zoom or Teams so participants can't see other's contact details.
- Ensure your backdrop is as neutral as possible if delivering an online public session from home.

3. Facilitated consultation and co-production sessions

Birmingham Museums Trust runs a variety of projects that involve online activity with members of the community and young people. These projects may involve a group of people that all know each other, or they may be meeting online for the first time. The risk assessment for each workshop must take this into account when planning the session. Many of the guidelines above also apply to these sessions. In addition:

- The member of staff running the session must hold a current DBS check and be Level 2 (or above) trained in Birmingham Museums Trust's safeguarding procedures. They must also be familiar with the Online Safeguarding Policy and operating procedures.
- Any new session types must be approved by your line manager and Designated Safeguarding Officer, and logged on BMT's Online Activity Register.
- No one under the age of 16 will be able to attend the meeting unaccompanied by an adult.
- Participants must complete an Online Participation Agreement Form before they can join the session. The form describes the session(s), gives participants information on how to stay safe online, states how we will manage their contact data and asks for their consent.
- Information about how to stay safe online is included in the group induction.
- Ensure time for introductions for each participant in the workshop.
- Set out any house rules for the session at the start, including how participants can interact with us and explain any functions of the platform we'll be using.
- Send out any material for the session in good time beforehand.
- Facilitate the behaviour of participants in the session. If a participant becomes disruptive, inform them that they will be put on mute and if necessary removed from the session. Contact a Designated Safeguarding Officer to decide next steps.
- Ensure there are always at least two people in an online session with a young person or vulnerable adult, either two members of staff or another participant. This is to ensure the safety of the participants and staff.
- If participants are connecting from home, they must be in an open living space throughout the meeting, such as a living room or kitchen, and not their bedroom.

4. Online chat groups

Birmingham Museums Trust may set up a chat group, for example in Basecamp, Facebook or on WhatsApp, as part of an engagement project. Project partners may also run chat groups with participants as part of an

engagement project with BMT. We also recognise that participants may want to set up a chat group with others they are working with on a project or programme, as the group gets to know one another. We recognise the particular risks around chat groups where the content is closed (WhatsApp). To run and support such groups safely:

- Before setting up a chat group, discuss the proposal with one of the Designated Safeguarding Officers to ensure there is no other means of achieving the same outcome for the participants and for the project.
- Any new group must be approved by your line manager and Designated Safeguarding Officer, and logged on BMT's Online Activity Register.
- The member of staff running the group must hold a current DBS check and be Level 2 (or above) trained in Birmingham Museums Trust's safeguarding procedures. They must also be familiar with the Online Safeguarding Policy and operating procedures.
- There must always be two members of BMT staff on any chat group.
- No one under the age of 18 will be able to join the group.
- The maximum group size is 12 participants plus staff members.
- Participants must complete an Online Participation Agreement Form before they can join the group. The form describes the purpose of the group, gives participants information on how to stay safe online, states how we will manage their contact data and asks for their consent.
- Being part of a chat group must not be essential for participation, i.e. participants should not have to share their mobile number with others in order to participate in any BMT initiative.
- Information about how to stay safe online is included in the group induction.
- Use a Birmingham, Museums Trust device / phone number for the discussion group. Do not use your personal mobile number.
- The administrator of the group must manage the group, for example delete inappropriate posts and potentially remove a member of the group if required.
- The administrator must close the chat group when the project/programme ends, and log the closure date on BMT's Online Activity Register.

5. Social media engagement

The Digital team hold a master list of accounts and passwords. The following is required:

- No member of staff can set up a BMT social media account without prior approval of the Digital Development Manager.
- All passwords for accounts and the staff who have access to that account should be shared with the Digital Development Manager.
- Any change of user, account emails and passwords should be given to the Digital Development Manager.
- When a member of staff leaves, or is no longer responsible for social media, the password must be changed.

In addition:

- Passwords should not be shared with wider teams who are not responsible for social media. A master list is held by the Digital Development Manager if a password is needed in an emergency.

- Social media accounts must be set up with a BMT email account. No one should use a personal email for a BMT social media account.
- If for a short term reason someone who does not work for BMT takes over the account and requires the password (e.g. a takeover day) the password must be changed immediately afterwards.
- Account holders will seek advice from one of the Designated Safeguarding Officers on safeguarding requirements or concerns.
- Account holders will remove inappropriate posts by public or staff, explaining why, and informing anyone who may be affected.
- Content will be consistent with our aims and tone as an organisation.
- Participants will need to give permission for photographs or videos to be posted on social media (see point 7 below).
- When using Direct Messaging, do not say anything that you would not say in the open.
- Account holders to receive Level 2 Safeguarding training so they are familiar with how to recognise and report any safeguarding incidents or concerns.

6. Direct e-communications

Direct email or DM contact with children under 18 should only be with the approval of your manager and strictly for work purposes only.

Where direct communication with children under 18 is agreed for business purposes, such as to contact work experience placements, young volunteers, and members of Birmingham Museums Trust youth boards, the following procedures must be followed:

Work experience placements (aged 15-17): a parent/guardian or representative from the school must be copied in to email correspondence. Where this is not possible, a member of Birmingham Museums Trust staff with level 2 safeguarding training must be copied into the correspondence.

Volunteers aged 16-17: a member of Birmingham Museums Trust staff with at least level 2 safeguarding training must be copied into email correspondence.

All enquiries for work placements, whether by adults or children must to be sent to and from BMT's work experience email address.

7. Film and photography

Photographs and film of Birmingham Museums Trust activity must not include any participant unless authorised by the appropriate member of staff, and consent is given by the parent/adult responsible for the child/vulnerable adult. The Photography and Film Consent Form is available [here](#)

All images and film requiring parental/guardian consent must be stored in the BMT Digital Asset Management System (DAMS), with the signed consent form. A registered BMT device should be used for film/photography.

Freelance film/photographers must not use BMT images for their own use unless written permission is obtained in advance from BMT. No BMT film or images involving children, young people or vulnerable adults can be stored, used or shared by freelancers. All freelancers commissioned to take film or photography of BMT activity must be made aware of this policy.

To report any safeguarding concerns or incidents follow [BMT Safeguarding Procedures](#)

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1	May 2020	Janine Eason	New online safety policy
2	13 May 2021	Janine Eason	New and expanded policy and operating guidelines. Approved by Board on 13 May 2021.

Relevant documents

[BMT Safeguarding Policy](#)

[BMT Safeguarding Procedures](#)

[BMT Photography and Film Consent Form](#)

[BMT Safeguarded Roles](#)

[BMT Safeguarding Training Matrix](#)

BMT Online Activity Register