Online Safety Policy

The Odyssey Hub Ltd

1. Purpose and Scope

This Online Safety Policy sets out how Odyssey Hub safeguards children and young people when engaging in online and digital activity. It applies to all staff, associates, volunteers, and learners who access or use digital systems, platforms, or communication tools as part of Odyssey Hub provision.

Odyssey Hub delivers creative, therapeutic, and educational alternative provision. Online activity may include virtual sessions, digital communication, collaborative creative work, and facilitated online role-play. This policy ensures that all such activity is safe, appropriate, proportionate, and aligned with safeguarding best practice.

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2. Ethos and Safeguarding Principles

Odyssey Hub believes that:

- Children and young people should never experience abuse, harm, or exploitation of any kind.
- Online spaces can support engagement, creativity, and learning, particularly for learners who struggle to access face-to-face provision.
- Safeguards must always be in place to protect learners, staff, and the organisation.

We recognise that:

- Many learners supported by Odyssey Hub are neurodivergent or have SEMH needs and may be particularly vulnerable online.
- Online safety is an integral part of safeguarding and child protection.
- Working in partnership with parents/carers, schools, local authorities, and other professionals is essential.

Our approach to online safety follows the **4 Cs framework**:

- **Content** – what learners may see or access online
- **Contact** – who learners interact with
- **Conduct** – how users behave online

- **Commerce** – risks relating to money, scams, or exploitation

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3. Legal and Statutory Context

Odyssey Hub is not a registered school. However, safeguarding standards are aligned with statutory expectations and Local Authority commissioning guidance for alternative provision and commissioned support.

Our practice is informed by:

- Keeping Children Safe in Education (best-practice alignment)
- The Online Safety Act 2023
- The Data Protection Act 2018 and UK GDPR
- Relevant safeguarding and child protection legislation applicable in England

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4. Roles and Responsibilities

Director

The Director has overall responsibility for ensuring that appropriate safeguarding and online safety arrangements are in place across Odyssey Hub.

Designated Safeguarding Lead (DSL)

The DSL is responsible for:

- Oversight of safeguarding and online safety
- Responding to online safety concerns and incidents
- Liaising with parents/carers, local authorities, and safeguarding partners where required
- Ensuring this policy is implemented and reviewed

Staff, Associates, and Volunteers

All staff and associates must:

- Uphold this Online Safety Policy at all times
- Maintain professional boundaries in online environments
- Report concerns immediately via safeguarding procedures
- Model safe, respectful, and responsible online behaviour

5. Acceptable Use of Digital Technology

Digital systems and platforms must not be used to:

- Access, create, or share illegal, harmful, or inappropriate content
- Engage in bullying, harassment, discrimination, or hate-based behaviour
- Share personal contact details, addresses, or identifying information
- Bypass platform safeguards or moderation tools

Misuse may result in suspension of online access and escalation through safeguarding or disciplinary procedures.

6. Online Communication and Direct Messaging

Online communication is governed by clear professional boundaries and Local Authority expectations regarding auditability and safeguarding oversight.

Principles

- All communication with learners is **purpose-led**, **time-limited**, and **transparent**.
- Communication outside scheduled sessions is kept to a minimum and is administrative or safeguarding-related only.
- Parents/carers provide informed consent for all forms of digital communication.

Boundaries

- Staff do not engage in open-ended or social messaging with learners.
- Personal social media accounts are never used to contact learners.
- Disappearing-message platforms are not used.
- Digital communication may be reviewed by senior staff where safeguarding or professional boundary concerns arise.

Contact Times

- Online contact normally takes place within standard working hours.
- Sessions and communication do not normally extend beyond **5.00pm**, except in exceptional, pre-agreed circumstances.

7. Virtual Sessions

Virtual sessions are delivered as structured alternative provision and follow the same safeguarding expectations as face-to-face sessions.

- Sessions are planned, facilitated, and supervised by Odyssey Hub staff.
- Learners may participate from a private space (including their home environment) with parental consent.
- Staff remain alert to wellbeing, safeguarding, and online safety concerns at all times.

Virtual delivery is not treated as informal gaming or unstructured social activity.

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8. Online Role-Play and Narrative Platforms

Odyssey Hub uses facilitated role-play and narrative-led learning (e.g. D&D-style approaches) as therapeutic and educational tools.

Safeguards include:

- All role-play spaces are staff-facilitated and actively moderated.
- In-character interaction does not override safeguarding rules or professional boundaries.
- Private or unsupervised in-character messaging is not permitted.
- Clear distinction is maintained between fictional roles and real-world identity.
- Role-play is paused immediately if boundaries blur or safeguarding concerns arise.

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9. Recording of Sessions

Odyssey Hub may use **limited recording of sessions**, including audio recording or other appropriate formats, for clearly defined purposes linked to the delivery of provision.

Recording may be used for:

- Supporting **narrative continuity** within creative or role-play–based provision (e.g. enabling learners to reconnect with story elements, characters, or decisions made in previous sessions)
- Safeguarding concerns
- Supervision and reflective practice

- Quality assurance or dispute resolution

Recording is **not continuous or covert** and is only undertaken where it supports learning, engagement, or safeguarding outcomes.

All recording will:

- Take place with **informed consent** from parents/carers (and learners where appropriate)
- Be **purpose-limited**, with the reason for recording clearly identified
- Use the **least intrusive format possible** (for example, audio rather than video where appropriate)
- Be stored securely and accessed only by authorised personnel

Retention and Deletion

Recordings made solely for narrative continuity or learning purposes are retained only for a **short, defined period** and are deleted once they are no longer required to support the learner's engagement (for example, after the next session or short story arc).

Recordings made for safeguarding, supervision, or quality assurance purposes are retained in line with data protection requirements and safeguarding procedures and are deleted once their purpose has been fulfilled.

All recordings are managed in accordance with data protection legislation and Odyssey Hub's Data Protection and Privacy Policies.

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10. Digital Images and Content

- Images, video, or audio of learners are captured or shared only with explicit parental consent.
- Learners' full names are not published alongside images or creative work.
- Digital content is stored securely and used only for agreed purposes.

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11. Data Protection and Information Security

Odyssey Hub:

- Collects and processes only necessary personal data
- Uses password-protected and secure digital systems

- Ensures staff receive data protection training
- Manages and reports data breaches in line with statutory requirements

Further detail is set out in the Odyssey Hub Data Protection and Privacy Policies.

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12. Reporting Concerns and Incidents

All online safety concerns must be reported immediately to the Designated Safeguarding Lead.

Concerns may include:

- Inappropriate content or contact
- Boundary violations
- Safeguarding disclosures
- Cyberbullying or harassment

Incidents are logged, responded to proportionately, and escalated to parents/carers, local authorities, or safeguarding partners where required. Odyssey Hub cooperates fully with Local Authority safeguarding enquiries and reviews where provision is commissioned or linked to EHCP outcomes.

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13. Training and Awareness

- All staff and associates receive safeguarding and online safety training at induction and at regular intervals.
- Online safety is embedded into work with learners in an age- and needs-appropriate manner.
- Parents/carers are supported with guidance and signposting where appropriate.

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14. Review and Monitoring

This policy is reviewed annually or earlier if:

- Significant changes occur in technology or delivery models
- A serious online safety or safeguarding incident takes place
- New statutory guidance is issued

This policy should be read alongside:

- Safeguarding and Child Protection Policy
- Code of Conduct for Staff and Associates
- Data Protection and Privacy Policy
- Whistleblowing Policy (where applicable)

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