

Digital Safeguarding & Privacy Policy

**Portraits of Recovery (PORe)
March 2023**

Digital Safeguarding & Privacy Policy		Latest Amendment Date: March 2023
Version No. 2		Date for Review: March 2024
Office: Beehive Lofts, Beehive Mill, Jersey Street, Ancoats, Manchester, M4 6JG		
Company LTD by guarantee registration no: 7732887. Charity registration no: 1149079.		

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Table of Contents

1. Introduction	4
2. Purpose	4
4. Definitions.....	5
Adult	5
Vulnerable Adult	5
5. Digital Safeguarding Principles and Commitments	5
6. Digital Safeguarding	6
Content risks	6
Contact risks	6
Conduct risks.....	7
Technology-based gender-based violence	7
7. Responsibilities	8
All staff.....	8
Director and Trustees	8
Artists and volunteers.....	8
Training	9
Support for those who report abuse	9
Rights of vulnerable adults	9
8. Use of Internet and Social Media	9
Use of PORE’s ICT equipment	10
Use of social media and digital platforms.....	10
9. Privacy, Data Protection & Informed Consent.....	11
Minimum principles.....	11
Informed consent	12
10. Safe Programming and Risk Management	13
Digital Risk Assessment.....	13
Risk Mitigation	13
11. Breaches of the Policy	14
12. How to raise a Complaint or Concern.....	14
13. How to Respond to a Complaint or Concern	14
14. Review	15
15. Links to other policies and procedures.....	15
APPENDICES.....	17
Appendix 1 – Two Part Consent and Release Form.....	17

Digital Safeguarding & Privacy Policy		Latest Amendment Date: March 2023
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1. Introduction

The world is an increasingly digital place, and Portraits of Recovery (**PORe**) recognises the opportunity and the challenges presented when communicating, connecting and working online. Understanding the associated risks to ensure the safety, security, and wellbeing of the people involved in our work, and our safeguarding procedures need to be relevant to both offline and online spaces.

This policy outlines **PORe’s** expectations for the appropriate use of digital media by staff, partners, representatives, supporters, volunteers, project participants and beneficiaries – and others coming into contact with us through digital platforms.

The guidance in this policy should not be taken as an exhaustive list. As the digital world rapidly evolves, it is important that **PORe** staff and those working with us take responsibility for considering the full range of risks and safeguards required.

The policy covers all staff and areas of work and forms part of the Terms and Conditions of Employment and applies to all employees, freelancers, trustees, and volunteers.

To note for policy purposes, **PORe** only works with adults, aged 18 years and over.

This policy will be reviewed annually, or more often if required.

2. Purpose

Portraits of Recovery (**PORe**) is committed to providing a welcoming environment where everyone is respected and valued, and can feel safe and secure, online and offline. This includes staff, freelancers, volunteers and beneficiaries. The Digital Policy applies both inside and outside of working hours

The concept of safeguarding applies in a range of situations to all adults, regardless of whether they are receiving services that are classed as “regulated” activities or whether they are defined as “vulnerable” or “at risk of abuse or neglect”.

This policy sets out **PORe’s** approach to digital safeguarding and covers all digital spaces where **PORe’s** work is conducted. This includes, but is not limited to: email; social media channels and online platforms relating to **PORe’s** work (including Facebook, Twitter, Instagram, YouTube, WhatsApp, LinkedIn, blogging platforms); websites and ICT equipment provided by **PORe**.

This policy covers:

- Our digital safeguarding commitments, including ensuring effective action is taken when problems occur
- Principles upon which **PORe** will base its decision making and actions

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- Our expectations of all those who work on behalf of **PORe**

3. Scope

This policy applies to all those engaged in work (including staff, volunteers, artists, delivery partners, subcontractors) or learning with **PORe**, regardless of their status within the organisation, or their length of service. Staff, and volunteers are encouraged to raise any legitimate concerns they may have about a wrongdoing and will be afforded protection.

Staff/Employees

For the purposes of this policy staff/employees will include salaried staff as well as freelance and contractual workers.

Director

This position is held by Mark Prest.

4. Definitions

Adult

An adult is anyone aged 18 or over (PORe does not work with people under the age of 18 years old).

Vulnerable Adult

All adults are potential victims of crime or abuse, but not all adults are vulnerable – most adults are capable of protecting themselves, only a proportion will be in need of protective intervention.

The broad definition of a ‘vulnerable adult’ referred to in the 1997 Consultation Paper ‘Who Decides?’ issued by the Lord Chancellor’s Department, is a person over the aged 18 years and older: **“who is, or may be in need of Community Care Services by reason of mental or other disability, age or illness: and who is, or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation”**

This legally excludes those with substance use issues. However, we class these people as vulnerable and will take all appropriate steps to safeguard them.

5. Digital Safeguarding Principles and Commitments

It is **PORe**’s responsibility to ensure the health, safety and wellbeing of staff, partners, representatives, volunteers, supporters, project participants and beneficiaries, online as well as in person. Based on feedback mechanisms, it is **PORe**’s responsibility to monitor this and to take appropriate measures when deemed necessary. Also refer to our separate Safeguarding Policy.

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PORe’s digital safeguarding commitment is to:

- Support the people involved in **PORe’s** work to navigate digital spaces and use equipment and digital tools safely and effectively
- Be proactive in promoting digital safety by giving guidance, tools and training to staff, partners and those working with or on behalf of **PORe** where possible and appropriate
- Take action on digital safeguarding and data protection incidents when **PORe** is aware of these (see Sections 11 and 12 for more information)

6. Digital Safeguarding

Digital safeguarding refers to the safeguarding policies, procedures and practices specifically relating to online spaces. The same safeguarding principles apply to **PORe’s** programmes and activities, whether these take place digitally or physically. However, there are specific considerations to consider with online initiatives, as digital technology has brought about new safeguarding issues. For example, perpetrators of exploitation, abuse and harassment can hide behind fake photos and profiles, and the online disinhibition effect leads to the proliferation of trolling and cyberbullying. Images, videos, and texts can be sent easily to large groups of people, and once images or data have been shared digitally, it is almost impossible to delete or recall them.

The following risks should be considered when considering digital safeguarding.

Content risks

Risks that are produced because of the material that people can access online. People may be exposed to this content actively or passively, and it may produce a harmful effect. Content may be illegal to possess or share according to national law, e.g. sexually exploitative images of children or radicalising videos. Inappropriate and offensive content is more subjective, and includes: commercial adverts or spam; violent, extremist or hateful material; sexually exploitative or sexual material; and content which is discriminatory based on someone’s race, ethnicity, nationality, class, socioeconomic status, age, sex and gender identity/expression, sexual orientation, (dis)ability, religion, language or other status.

Contact risks

Risks that are produced because of others’ online behaviour. Individuals may have information about them shared or may be engaged in ways which lead to harmful consequences. The types of behaviour which people may experience include:

- Bullying online or through mobile phones;
- Harassment and stalking;
- Ideological grooming;

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- Exposure to political risk, e.g. government surveillance or having details of online activism shared with authorities in politically oppressed contexts;
- Increased exposure to cybersecurity risks, e.g. by having malicious content shared such as ransomware, apps or other active content or malicious code;
- Harvesting, tracking and illegal sharing and possession of information – including having personal data collected, processed or shared without the individual’s consent or on another unlawful basis;
- Distribution of private and sexual images, e.g. the distribution of sexually exploitative images or videos without an individual’s permission;
- Non-contact sexual abuse and exploitation – including grooming, flashing, being persuaded to perform sexual acts online, and being exposed to sexually exploitative images or videos.

Conduct risks

Risks that are produced because of people’s own online behaviour, which may put themselves and others at risk. People may download something illegally, bully, harass or exploit others, unintentionally reveal their location, create, and upload sexual material or sext (send someone sexually explicit photographs or messages via mobile phone). This may also include online activism in politically oppressed or conservative contexts, or breaking confidentiality of closed spaces by reposting, sharing, downloading or in other ways transmitting information that leads to harassment, exploitation, or other harm in another setting.

Technology-based gender-based violence

PORe recognises that online harassment, bullying and sexual exploitation can affect anyone, but is most likely to affect women, girls and LGBTQI+ individuals. These groups face an increased risk of violence through digital technology, which can be considered a form of Gender-Based Violence (an umbrella term for any harm that is perpetrated against a person’s will, and that results from power inequalities that are based on gender roles, expectations, and norms). **PORe** staff, partners, representatives and others working with **PORe** should be aware of common perpetrators and acts of such violence.

Perpetrators include:

- Individuals or groups who target people on an ideological basis such as fundamentalist, patriarchal, sexist or homophobic groups
- Acquaintances, intimate partners or family members who wish to harm someone or exercise power over them

Acts of violence include:

- Online harassment and trolling
- Cyberstalking (tracking and monitoring of someone’s movements and activities online)

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- Invasion of privacy by gaining access to phones, devices, and email or other accounts without consent
- Distribution without consent of private and sexual images, or using these images as leverage and enforcement of power dynamics

7. Responsibilities

All staff

All staff, volunteers and trustees are responsible for creating an environment that promotes well-being and ensures personal safety. They will act promptly in accordance with the safeguarding policy and inform the Organisational Head of any issues of suspected or reported abuse.

All employees, trustees and volunteers will read and sign, the Vulnerable Adults Safeguarding Policy and follow the policy.

All employees, trustees and volunteers must declare any existing or subsequent convictions, failure to do so will be regarded as gross misconduct, possibly resulting in dismissal or termination of contract.

Director and Trustees

The Director and the Trustees will hold overall responsibility for this policy and its implementation.

Business Operations & Finance Manager (the Designated Safeguarding Lead) will be responsible for:

- reviewing and updating the Safeguarding Policy annually
- maintaining a Safeguarding central record
- maintaining confidential and secure written records
- supporting investigations into safeguarding allegations as appropriate

Digital Marketing Officer

- responsible for making sure digital content posted is appropriate and for the handling sensitive content as necessary
- responsible for ensuring that information stored digitally and online is in accordance with data protection policy and in accordance with the law

Artists and volunteers

All artists and volunteers must be given access to the Safeguarding Policy and a safeguarding induction making them aware of how to report incidents and concerns.

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A free online resource for professionals with safeguarding responsibilities has been developed by **Bradford Council and Collingwood Learning**. Each of this series of videos is based upon stories from the people involved or through anonymised cases. Some stories have been edited and some have been combined to cover the key issues in a simple, quick, and powerful way. But everything is based upon real people, and real situations. www.realsafeguardingstories.com

Training

When capacity and resource allows, staff and volunteer training will be offered to ensure that they understand their Safeguarding responsibilities and act upon them accordingly. Training will be proportionate to the role.

Support for those who report abuse

All those making a complaint or allegation or expressing concern, whether they are staff, service users, carers or members of the general public should be reassured that:

- they will be taken seriously
- their comments will usually be treated confidentially, but their concerns may be shared if they or others are at significant risk
- if beneficiaries, they will be given immediate protection from the risk of reprisals or intimidation
- if staff they will be given support and afforded protection, if necessary, in line with the Public Interest Disclosure Act 1998.

Rights of vulnerable adults

The Vulnerable Adult has the right:

- To be made aware of this policy
- To have alleged incidents recognised and taken seriously
- To receive fair and respectful treatment throughout
- To be involved in any process as appropriate
- To receive information about the outcome

8. Use of Internet and Social Media

All PORE staff must adhere to the PORE Code of Conduct, the terms of their employment and the below guidelines when using equipment, internet, social media or digital platforms on behalf of, or belonging to PORE.

Digital Safeguarding & Privacy Policy		Latest Amendment Date: March 2023
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Use of PORE’s ICT equipment

Usage of equipment or internet which has been provided by PORE must follow the relevant affiliate’s Acceptable Usage Policy. In particular, the following should be considered:

- It is prohibited for anyone to browse, download, access or share content which is illegal, harmful, violent, extremist, sexually exploitative, abusive, offensive or otherwise inappropriate using equipment or internet which has been provided by PORE, unless this is required for their role, e.g. safeguarding and investigator roles.
- Parameters for acceptable usage of equipment should be set by PORE, and PORE may use software to limit what apps or tools staff, consultants or participants are able to access.
- Equipment provided by **PORe** should ensure that technical solutions are in place to protect the user, e.g. anti-virus, monitoring and filtering software.
- Appropriate monitoring should take place based on the level of risk of the people involved and the content which they will be coming into contact with.
- **PORe** should give advice, support and training in how to mitigate risk when using equipment and internet which it has provided.
- Where **PORe** is giving the equipment to a partner, project participant, beneficiary or others involved in **PORe’s** work, e.g. at the end of a project, equipment should be cleaned of any personal data. It should be made clear to them that they are now responsible for the use and maintenance of the equipment. In such a case, these guidelines will no longer apply.

Use of social media and digital platforms

- Staff, partners and others working with **PORe** are personally responsible for what they communicate on social media and digital platforms – both on behalf of PORE and in a personal capacity. Published content is often available for anyone to read, and may reflect negatively on the organisation, while those using online platforms as part of PORE’s work may be exposed to harmful content.
- **PORe** staff, partners and representatives should not behave in a threatening, bullying or abusive way online – whether in a professional or personal capacity
- Staff responsible for the creation of online content on **PORe** accounts and platforms (e.g. Tweets and Facebook posts) should seek advice and sign-off from the Director on sensitive content or where they are concerned about the appropriateness of the content
- When posting potentially upsetting material on **PORe’s** social media accounts and platforms, content warnings should be given
- No-one should be tagged in social media posts without their permission
- If illegal, harmful, violent, extremist, sexually exploitative, abusive, offensive or otherwise inappropriate content is posted in **PORe’s** groups or platforms, this should be hidden or deleted, and where appropriate reported to third-party platform hosts. If PORE representatives see, or are made aware of, such content but do not have administration

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rights to remove it, they should report it to group moderators following the procedures outlined in Sections 11 and 12 below

- Where possible, staff should not make use of their personal social media accounts to carry out their work for **PORe**-related projects, events or initiatives to enable staff member to maintain boundaries between their personal and professional lives
- **PORe** staff can only use their PORE email address to set up social media accounts if these will be used on behalf of the organisation. Where this account represents an PORE initiative, managers should have access to this account, and login details should be shared with other PORE staff members so that this account can be used as a shared resource
- **PORe** should provide guidelines on settings and privacy to people engaging in digital spaces for **PORe** initiatives to protect them from harmful behaviour
- Sharing online content of people involved in PORE’s work on social media should follow the guidelines on privacy, data protection, informed consent, safe programming and risk management outlined below in Sections 8 and 9
- Participants must be made aware at the beginning of each programme that they must not post any personal information or images of other participants, staff or volunteers without their express and informed consent

9. Privacy, Data Protection & Informed Consent

PORe has a duty of care to protect the digital data and content of staff, partners, representatives, volunteers, supporters, project participants, beneficiaries and others involved in **PORe**’s work, even when they make the informed decision to share this content. This duty of care is rooted in privacy law, and includes an obligation to be transparent in explaining how PORE will use individuals’ data, how **PORe** considers the risk to individuals, and how **PORe** cares for their data throughout the lifespan within which it will be used.

PORe must take every reasonable precaution to ensure that any digital data or content does not place people at risk or render them vulnerable to any form of harassment, abuse or exploitation.

Research which involves digital elements, such as online surveys or platforms, must be well thought through and appropriate for the context. Special consideration must be given to data protection concerns and mitigating risk to research participants.

All information stored digitally and online by PORE must be processed in accordance with law.

Minimum principles

This Digital Safeguarding Policy does not replace these policies, but any digital activities must embrace the following principles at a minimum, which align with GDPR:

- **PORe** is **transparent, lawful, and fair** with individuals when using their data, and will explain to individuals how it will use data when it collects or obtains it

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- **PORe** will only use data for the **purposes for which it was obtained** and then destroy it appropriately. PORE will not retain or use this information to contact or work with people for any other reason
- **PORe** will only collect the **minimal amount of data** for the purpose at hand
- **PORe** will retain **accurate data** and keep it for **no longer than necessary**
- **PORe** will ensure its data is stored securely and access is restricted to as small a number of staff as possible
- When emailing groups, addresses should be listed as Blind Copy (BCC) so as to keep everyone’s digital access secure and private
- **PORe** will only **disclose personal information outside of PORE** in an identifiable form if explicit consent has been given for this or there is a compelling legal reason (or similar overriding interest) which is considered and risk-assessed
- **PORe** will comply fully with any **data protection legislation**
- **PORe** will ensure that, from their inception, **projects and activities which involve data** must include a **planned-in consideration** for the protection of confidentiality of data (**security**) and the privacy and agency of individuals (**privacy**)

Informed consent

PORe ensures that informed consent is obtained for the gathering of content which will be shared publicly in the digital sphere. This ensures that the person truly understands what they are consenting to, with full knowledge of the possible risks and benefits. Privacy and data protection law which outlines legal requirements for gathering and using data may in some instances require or present an option for consent, and must be considered alongside this process of informed consent. However, the below guidelines for gathering and sharing content online represent a requirement for ethical consent which supplement these legal guidelines, and which PORE has committed to.

- Informed Consent which must be followed whenever gathering content
- Adults must be given enough context to make this context ‘informed’. They must be able to reasonably understand how their image or likeness may be used, and what the consequences may be
- Identifying information should not be included when content is shared online where this may put people at risk
- A story-gatherer (e.g. interviewer, photographer, video-maker) should exercise judgement and creative skills to tell a powerful story in a way that doesn’t reveal the identity of a vulnerable adult, or someone who may be put at risk due to e.g. political or religious contexts
- Participants retain the right to remove any pictures or stories about them from online spaces at any stage and should be made aware of this. There must be a practical means for people to contact PORE to allow them to assert this right.

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- Content should receive the appropriate levels of sign-off when gathering content and before sharing it online
- **PORe** will utilise a two part consent for filming. Consent will be given initially for the taking of film and images. The participants will then have another opportunity to view the resulting piece and re-consent that they are happy for it to be shown. They are free to withdraw consent at this time. An example of the consent form can be seen in Appendix 1

10.Safe Programming and Risk Management

Digital Risk Assessment

Effective contextual analysis is essential to identify potential risks for staff, partners, representatives, volunteers, supporters, project participants, beneficiaries or others involved in **PORe’s** work when operating online. Assessed risks, potential consequences and mitigation strategies should be considered before any programmes, activities or initiatives which have a digital element begin.

The following elements should be taken into consideration:

- The social, cultural and political context which may increase risk.
- The individual situation of the people involved in **PORe’s** work – including intersectional factors relating to race, ethnicity, religion, age, sex and gender identity/expression, sexual orientation, (dis)ability, political affiliation, and any other status which may put them at risk

Risk Mitigation

The extent of the risks identified in the Risk Assessment will determine whether **PORe** should mitigate against these by restricting **PORe’s** online activities, or advising those involved in **PORe’s** work against online activity. In addition, they should not undertake online activities through **PORe** if:

- There is a risk of identification through online activities, where this may put them at risk
- It is deemed to put them at risk of violence
- It involves risk of accidents which they are unlikely to recognise (e.g. due to lack of awareness of online risks or lack of online experience There is no way for **PORe** to mitigate risks.
- The outcome of a Risk Assessment indicates that there would be high risk to individuals for these or other factors.

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11. Breaches of the Policy

Breaches of the Policy will not be tolerated and may result in disciplinary procedures, change of duties, termination of employment or relationship, and possible legal proceedings, for **PORe** staff, contractors, volunteers or people working in **PORe’s** name.

PORe will take action against anyone, whether they are the subject of a complaint or not, who seeks to or carries out retaliatory action (such as, but not limited to, harassment, intimidation, unfair disciplinary action or victimisation) against complainants, survivors or other witnesses. Employees who are found to do this will be subject to disciplinary action, up to and including termination of employment. Others who work with **PORe** may have their relationship with **PORe** terminated.

If an **PORe** employee is found to have made an allegation that they knew to be false they will be subject to disciplinary action, up to and including termination of employment. Others who work on behalf of **PORe** will be subject to action that may result in the termination of their relationship with **PORe**.

12. How to raise a Complaint or Concern

Anyone can raise a concern about inappropriate or illegal content which has been posted online relating to **PORe’s** initiatives. Concerns should be raised with social media, website or project managers as appropriate, so that they can moderate and remove this content and report to a third-party service provider. In the case of illegal content or a safeguarding concern, this should be raised with Organisational Head so that they can deal with this appropriately and refer to the police or a support service where necessary.

PORe Employees and Related Personnel have a responsibility to report any suspicion or concerns concerning digital safeguarding. Any individual can raise a concern/complaint to **PORe** about an incident they have experienced, witnessed, or heard about concerning a **PORe** staff member or partner without fear of retribution. **PORe** Employees and Related Personnel *must not* investigate allegations or suspicions themselves.

Issues relating to data protection should be reported to **PORe’s** Organisational Head.

13. How to Respond to a Complaint or Concern

PORe is committed to responding to all complaints and concerns relating to digital safeguarding. Social media, website, and project managers should be contacted in the first instance as they are responsible for moderating and removing inappropriate online content and flagging this with third-party providers where appropriate. They are also responsible for contacting third-party providers to report this content, and where **PORe** is not able to remove content which poses a risk.

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Illegal content and safeguarding issues should be referred to **PORe’s** Director – it will then be established whether a copy or screenshot of the online content should be saved for use in future internal or external investigations. The Director is responsible for responding to issues relating to data protection and privacy.

PORe recognises that disclosures and suspicions should always be acted upon swiftly. If there is an urgent safeguarding situation, e.g. a supporter, project participant or beneficiary shares online that they are in imminent danger of harm or abuse, then immediate protective action must be taken. The Director should be contacted immediately in these instances and all reasonable measures should be taken to prevent harm, e.g. by contacting the police or appropriate support service directly where possible.

14. Review

The Business Operations & Finance Manager is responsible for maintenance, regular review and updating of this policy at least annually.

15. Links to other policies and procedures

This policy should be read in conjunction with the following policies/procedures kept on the shared drive:

- Safeguarding Policy
- Complaints Procedure
- Grievance, Harassment & Bullying Policy
- Equality, Diversity and Inclusion Policy
- PORE code of conduct
- Whistleblowing Policy & Procedures
- Disciplinary Policy
- Digital Safeguarding & Privacy Policy
- Volunteering Policy & Procedures

Other relevant information:

- Making Barring Referrals to the DBS (<https://www.gov.uk/>)
- Strategy for dealing with Safeguarding issues in Charities.(updated 6th December 2017) <https://www.gov.uk/.../strategy-for-dealing-with-safeguarding-issues-in-charities>

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POLICY APPROVED BY BOARD OF TRUSTEES ON:

Name	Position	Date	Signature
Mark Prest	Founding Director	19/10/21	
William Griffiths	Chair	19/10/21	
Stephen Whittle	Trustee	19/10/21	
Zoe Welch	Trustee	20/10/21	

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APPENDICES

Appendix 1 – Two Part Consent and Release Form

PROJECT TITLE

Participant information sheet

Project Information

During the project and workshops participants may be photographed or video recorded. Requests to the project delivery team for anonymity or non-participation in being part of audio-visual documentation and film making will be respected. If participants are interested in finding creative solutions to anonymity in relation to audio-visual documentation (e.g. voice without image), this can also be explored.

Expected outputs of this project are:

1. A series of artist led workshops and learning sessions.
2. An end of project public facing event.
3. An artist film by ?.

Primary contact: Claire Armitage

claire.armitage@portraits ofrecovery.org.uk

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PROJECT

Audio-Visual Release Consent Form

You are invited to take part in this project. Before you decide to take part, it is important that you understand why the project is being done and what it involves. Please take time to read the Information Sheet carefully and discuss it with others if you wish. Ask if anything is unclear or if you need more information.

Please initial box

1. I have read & understood the information sheet for the **PROJECT** & have been able to consider the information and ask questions about my participation in the project.

2. I understand that the group workshops may be sound, and video recorded. I do/do not give my consent for my image and voice to be recorded (delete as needed).

3. I do/do not give permission for recordings of my participation in the project to be held on a password-protected laptop and/or hard drive during the project, and for up to six months after the project finishes (delete as needed).

4. I understand that images of me may be taken and used for documentation and dissemination/publicity purposes.

5. I understand that my participation is voluntary and that I am free to withdraw from the project at any time without having to give any reason.

Digital Safeguarding & Privacy Policy		Latest Amendment Date: March 2023
Version No. 2		Date for Review: March 2024
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Company LTD by guarantee registration no: 7732887. Charity registration no: 1149079.		

6. I give my consent to participate in the project that has been explained to my satisfaction.

Name of Participant

Date

Signature

Address

.....

.....

Town.....

Postcode.....

Mobile.....

Email.....

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PROJECT

Final Audio-Visual Release Consent Form

This letter confirms your release of recorded materials produced during **PROJECT**.

I hereby grant the following rights to PORE in the interest of furthering the creation and distribution of photographic / video materials (delete as required):

1. The right to record my image, photograph, picture, likeness, and voice by any technology or means.
2. The right to copy, use, perform, display, and distribute such recordings of me for any legitimate purpose, including but not limited to distribution by means of streaming or other technologies via the internet, or distribution of audio or video files for download by the public.
3. The right to combine such recordings of me with other images, recordings, or printed matter in the production of motion pictures, sound recordings, still photography or any other medium presently in existence or invented in the future.
4. The right to use my image and voice in connection with the marketing of **PROJECT** promotional events or educational or artistic materials.

I understand and agree that I will not receive compensation, now or in the future, in connection with PORE’s exercise of the rights granted hereunder.

I hereby release and forever discharge PORE from all claims, demands, rights, and causes of action of whatever kind I may have, caused by or arising from PORE’s exercise of rights granted hereunder and the use of recordings containing my image or voice, including all claims for libel and invasion of privacy or infringement of rights of copyright and publicity.

Name of Participant

Date

Signature

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