WhatsApp and Messaging Guidelines

Oxford Schools Chaplaincy

For OSC staff and volunteers communicating with young people under 18

1. Purpose

These guidelines set out how WhatsApp and other personal messaging should be used by Oxford Schools Chaplaincy (OSC) when communicating with young people under the age of 18.

The purpose is to ensure that communication remains professional, transparent and appropriate, while protecting young people, OSC staff and volunteers from safeguarding risks.

These guidelines should be read alongside the **OSC Safeguarding Policy, GDPR Policy and other relevant OSC policies and procedures**.

2. Use of WhatApp with young people

OSC staff may use WhatsApp to communicate with young people aged 13-17 where there is a clear OSC-related purpose, such as:

- sharing information about an OSC activity;
- arranging meetings or events;
- communicating practical information with a group of young people; or
- supporting an OSC-related group or activity.

WhatsApp should **not** be used for general social conversation or to develop personal relationships with young people.

Young people should only be contacted through an **OSC work mobile phone**. OSC staff must not use their personal mobile phone or personal WhatsApp account to communicate directly with a young person.

OSC volunteers are **not permitted to communicate with young people under 18 using WhatsApp or other personal messaging services on behalf of OSC**.

Personal mobile phones may be used by OSC staff and volunteers for contact with adults where appropriate, but not for direct messaging with young people under 18.

An OSC staff member should not participate in an OSC-related WhatsApp group involving young people unless they have access to an OSC work mobile phone.

3. Age and parental consent

WhatsApp's minimum age requirement should be observed. OSC should not knowingly use WhatsApp to communicate with a child below the applicable minimum age.

Before an OSC staff member communicates with a young person aged 13-17 through WhatsApp:

- written consent should be obtained from the young person's parent or carer;
- the parent/carer should understand the purpose of the communication and how WhatsApp will be used;
- permission should be obtained before the young person's telephone number is collected or added to an OSC WhatsApp group; and
- the young person should understand the purpose and expectations of the group.

Parental consent does not remove the requirement to follow OSC's safeguarding procedures or professional boundaries.

4. WhatsApp Groups

Where communication with young people is necessary, a group chat should be used rather than one-to-one messaging wherever reasonably possible.

The OSC staff member responsible for the group should be the group administrator.

As OSC currently has one Director, the group should include another appropriate adult wherever reasonably practicable. This could be an appropriate member of school staff or another authorised adult involved in the relevant OSC activity.

The aim is to ensure that communication with young people is open, accountable and observable, rather than relying on one adult communicating privately with a young person.

Where another appropriate adult cannot reasonably be included, the OSC staff member should consider whether WhatsApp is the appropriate method of communication and discuss this with the Director/DSL as appropriate.

Group membership should be kept to people who have a legitimate reason to be included. The administrator should regularly review membership and remove people who no longer need access.

5. Professional boundaries

OSC communication with young people should be:

- professional;
- appropriate to the young person's age and circumstances;
- related to OSC activities;
- factual and proportionate;
- during reasonable hours wherever possible; and
- transparent and accountable.

OSC staff and volunteers must not use messaging to establish or develop inappropriate personal relationships with young people.

Communication must never contain:

- sexual, suggestive or inappropriate comments;
- personal or intimate conversations;
- offensive or discriminatory comments;
- bullying or harassment;
- inappropriate jokes or images;
- content that could reasonably be misunderstood or cause concern; or
- material that could place a young person at risk.

OSC staff should not use disappearing messages or other features designed to prevent messages from being retained where these would prevent appropriate safeguarding records from being maintained.

6. Private messages

OSC staff should **not initiate or encourage one-to-one WhatsApp conversations with individual young people**.

The WhatsApp "Reply privately" function should not be used to move a conversation away from the group.

If a young person sends a private message to an OSC staff member, the staff member should:

1. avoid continuing a private conversation;
2. respond appropriately and, where possible, move the communication back into an appropriate group or communication channel;
3. ensure another appropriate adult is made aware where necessary; and
4. report or record any safeguarding concern in accordance with the OSC Safeguarding Policy.

If the message indicates that the young person may be at risk of harm, the OSC safeguarding procedures must be followed immediately. WhatsApp must not be relied upon as the safeguarding reporting mechanism.

7. Video and voice calls

WhatsApp video calling should not be used for one-to-one communication with a young person.

Any online meeting involving young people should use an OSC-approved platform and follow the relevant safeguarding arrangements, including appropriate adult supervision and transparency.

8. Safeguarding concerns

If a young person discloses a safeguarding concern, sends concerning content, or there is any other indication that they may be at risk of harm, the OSC staff or volunteer must follow the OSC Safeguarding Policy and reporting procedures.

Where appropriate, concerns should be passed promptly to the Designated Safeguarding Lead (DSL) at the young person's school and/or the OSC Safeguarding Lead, in accordance with OSC's safeguarding procedures.

Staff should not attempt to investigate a safeguarding concern through WhatsApp.

Relevant messages should be retained as evidence where this is necessary and appropriate. Staff should not forward safeguarding material unnecessarily or share it with people who do not need to see it.

9. Records, privacy and GDPR

WhatsApp should not be used as the main storage location for OSC records.

Personal information about young people should be limited to what is necessary for the legitimate OSC purpose.

Staff should take care not to share:

- unnecessary personal information;
- sensitive information about a young person;
- photographs or videos without appropriate consent;
- information about other young people; or
- confidential school or family information.

Where messages need to be retained for safeguarding, legal or organisational reasons, they should be handled in accordance with the OSC GDPR Policy and relevant retention arrangements.

Messages should not be routinely deleted where doing so could remove evidence relevant to a safeguarding concern or complaint.

10. Photographs, videos and social media

Photographs and videos of young people must only be taken, shared or stored in accordance with OSC's safeguarding, consent and data protection requirements.

Staff should not ask young people to send personal photographs or videos to them through WhatsApp unless there is a clear, authorised OSC purpose and appropriate consent.

Any inappropriate or concerning image or video received from a young person should be dealt with in accordance with safeguarding procedures. It should not be forwarded or copied unnecessarily.

11. Appropriate content

OSC WhatsApp groups and communications must not contain or link to material that:

- is unlawful;
- is defamatory, threatening, bullying or harassing;
- contains inappropriate sexual material or references;
- contains discriminatory or offensive language;
- breaches copyright or data protection requirements;
- could be harmful to a child or young person;
- could reasonably bring OSC into disrepute; or
- is unrelated to the legitimate purpose of the group.

The administrator should act promptly where inappropriate content is posted and seek advice where there is a safeguarding concern.

12. Leaving or closing a group

When an OSC activity or group comes to an end, the administrator should review whether the WhatsApp group is still required.

Young people and adults who no longer have a legitimate reason to remain in the group should be removed where appropriate.

Relevant records should be retained in accordance with OSC's GDPR and record-retention arrangements.

13. Review

These guidelines should be reviewed annually and whenever there are significant changes to:

- safeguarding guidance;
- data protection requirements;
- WhatsApp functionality or terms of service; or
- OSC's use of messaging services.