

Social Media Policy

1. Purpose

- 1.1. Social media is a central part of CLAPA's day-to-day operations. Our social media following is our largest audience, and with over 10,000 members in our official Facebook Groups, it is a great source of emotional support to people in the CLAPA Community.
- 1.2. Staff and volunteers (including Trustees) are actively encouraged to make use of social media as appropriate within their roles to support the charity's work. However, as with any system which is public and largely out of our control, there are many potential pitfalls.
- 1.3. This policy sets out the ways in which CLAPA expects its staff and volunteers to make use of social media in order to best support the CLAPA Community, as well as protect themselves and the charity. It provides guidelines and best practice for the use of social media accounts and groups, and for safeguarding vulnerable groups such as children and young people.

2. Scope

- 2.1. This policy applies to all CLAPA staff and volunteers in their use of social media when representing CLAPA, interacting with people as a result of their connection to CLAPA (for example, with people in the official Facebook groups), and/or making their affiliation with CLAPA known. It is intended to help staff and volunteers understand what CLAPA expects of them and how they can best protect themselves, the charity and others.
- 2.2. Social media sites and services include, but are not limited to:
 - a) Popular social networks such as Twitter and Facebook
 - b) Photo sharing social networks such as Flickr and Instagram
 - c) Professional social networks such as LinkedIn
 - d) Direct messaging services such as WhatsApp
- 2.3. Some areas of this policy apply only to staff, while others only to volunteers, and these areas will be clearly labelled as such. All other areas of this policy apply to both staff and volunteers.

3. Responsibilities & Enforcement

- 3.1. All staff and volunteers using social media in any capacity have responsibility for ensuring their actions are in line with the areas of this policy which apply to them.
- 3.2. The Communications Team and the Communications and Information Manager have overall responsibility for:

- a) Ensuring CLAPA staff and volunteers use social media safely, appropriately, and in line with the charity's objectives and values.
 - b) Providing tools to manage the charity's social media presence, track performance, and monitor threats.
 - c) Ensuring requests for assistance and support made through social media are followed up appropriately.
- 3.3. CLAPA reserves the right to request that posts made by staff or volunteers are amended or deleted in line with this policy. Failure to comply will be considered a knowing breach of this policy.
- 3.4. CLAPA reserves the right to monitor how social media networks are used and accessed through the charity IT and internet connections. This will only be carried out by authorised staff.
- 3.5. Data relating to social networks which is written, sent or received through the charity's computer systems is part of official CLAPA records. The charity may be legally compelled to show this data to law enforcement agencies and other parties.
- 3.6. Breach of this policy, whether done knowingly or through carelessness, is a serious matter. A breach will subject users to disciplinary action, up to and including termination of employment. CLAPA staff and volunteers may in some cases be held personally liable for violating this policy. Where appropriate, the charity will involve the police or other law enforcement agencies in relation to breaches of this policy.

4. General Social Media Guidelines

- 4.1. Know the different networks. Staff and volunteers should take the time to familiarise themselves with a particular social network before posting to better understand its purpose, etiquette, content rules, and how to avoid common mistakes.
- 4.2. Think before you post. If you're concerned something may be taken the wrong way, or about some other risk, get a second opinion or just don't post. Never post spontaneously – always read through your words again (and the question or post that sparked your response if applicable) to ensure what you're posting is positive, helpful and appropriate. If a discussion is (or may become) heated, staff and volunteers must always seek to de-escalate and not respond emotionally. Staff and volunteers must also take care to not make commitments or promises on behalf of CLAPA without knowing for sure that the charity can deliver on these.
- 4.3. Take sensitive or complicated discussions off social media. Social media is not a good place to resolve difficult issues such as complaints. Once contact has been made, staff should handle further discussions via a more appropriate channel such as email.

- 4.4. Take security seriously. Staff and volunteers should look out for phishing attempts, spammers, and other security threats. Social networks can be used to distribute spam and malware.

5. Safeguarding

CLAPA works with people of all ages with diverse needs, and as such safeguarding is a top priority when developing and providing our services. All our staff and volunteers have a responsibility to safeguard the welfare of people using our services, and we take this responsibility very seriously.

5.1. General Concerns

If you are concerned about someone's welfare, it is important to report this as soon as possible so we can help. Please get in touch immediately by emailing safeguarding@clapa.com. You can also get in touch with your point of contact at CLAPA and/or any of the Safeguarding Team listed here: www.clapa.com/safeguarding/. All relevant safeguarding policies are also available here.

5.2. Children and Young People

- a) Staff and volunteers must familiarise themselves with the **Online Safety Policy for Young People** which contains more information about how we can all help to keep young people safe. The points in this section are highlights of this policy which focus on social media in particular.
- b) In accordance with **Safeguarding Policy**, we ask staff and volunteers NOT to add under-18s as friends or to accept friend requests from under-18s. You should only do this if you have frequent contact with the individual in question (e.g. staff members involved in the CYPC) and have received appropriate child protection training.
- c) If a young person sends you a friend request, please let your line manager or key contact know immediately.
- d) An exception is made in the case of trained CLAPA volunteers aged 16/17. In these cases, the young volunteer may send friend requests (and you may accept them), but 18+ volunteers should not send requests to under 18s. The young volunteer must take the initiative so there is no chance of them feeling pressured.
- e) Volunteers must not send private messages to under-18s. Staff should avoid sending private messages to under-18s, but when this is necessary, another member of staff or the young person's parent or carer must be copied in. If an under-18-year-old sends a private message to a volunteer, the volunteer should include another CLAPA staff member in any reply.

6. Use of Personal Accounts

6.1. Personal accounts' in this context are social media accounts used by staff and volunteers which are not specifically created or used for interacting with the CLAPA Community. This section sets out the ways in which we expect staff and volunteers to use their personal social media accounts under the scope of this policy.

6.2. Staff

- a) Staff should exercise good judgement and common sense when using their personal social media accounts, and remember that they have responsibility for what they post, even on private accounts.
- b) If at any point staff are concerned about actual or potential conflicts as a result of this, they must speak to their line manager or the Communications & Information Manager immediately. Intentional or malicious breaches will be subject to CLAPA's disciplinary policies and procedures.
- c) Personal accounts should never be used to join the CLAPA Groups or interact with people in the CLAPA Community in your capacity as a CLAPA staff member. This includes accepting friend requests. Your staff account should always be used for this.
- d) If you have a personal connection to cleft you are welcome to use your personal account to join groups and interact with others in the same way any of our beneficiaries would, but you must make it clear you are interacting in a personal capacity and that your views and posts do not represent those of CLAPA. Read the 'volunteers' section below for guidance on using personal accounts in this way.
- e) You may list your place of work, and discuss both your work and the work of the charity publically. In doing so, you must not do anything to bring the charity into disrepute, including (but not limited to):
 - i. Posting inappropriate content (see section 9)
 - ii. Breaking confidentiality or revealing private or sensitive information about the charity or its stakeholders (see 'sharing of personal information' below for more detail)
 - iii. Stating or implying that your personal views are those of the charity
 - iv. Making statements that are directly against the core values of CLAPA as a charity, or which are defamatory or disparaging towards the charity, its staff, volunteers, beneficiaries and/or supporters
 - v. Posting photographs or images of staff, volunteers, beneficiaries or supporters without their explicit, fully informed consent

- f) If your personal social media account is public (e.g. Twitter) and you wish to use it for work purposes such as networking, discovering and sharing relevant content, and posting about the charity to build its profile, you are welcome to do so with caution. You may spend a reasonable amount of time at work doing this, as long as it is for a specific work-related reason and does not interfere with your regular duties.

6.3. **Volunteers**

- a) Volunteers who wish to be active within CLAPA Facebook Groups should keep in mind the general training they have received, particularly with regards to safeguarding. While volunteers are not expected to act as a representative of CLAPA at all times, we still expect a certain level of professionalism, and this is especially vital when volunteers clearly identify themselves as being linked to CLAPA in this way. There is extra guidance for volunteer administrators in section 11.
- b) If volunteers have any questions or concerns, they should speak with their key contact in the first instance, or get in touch with the Communications and Information Manager. Malicious breaches of this policy will be considered a breach of the Volunteer Agreement and may result in the volunteer being asked to give up their role.
- c) You may list CLAPA as an organisation you volunteer for, discuss your work, and talk about the charity publically. In doing so, you must not do anything to bring the charity into disrepute, including (but not limited to):
 - i. Posting inappropriate content (see section 9)
 - ii. Breaking confidentiality or revealing private or sensitive information (see 'sharing of personal information' below for more detail)
 - iii. Stating or implying that your personal views are those of the charity
 - iv. Stating or implying that you are a staff member rather than a volunteer
 - vi. Making statements that are directly against the core values of CLAPA as a charity, or which are defamatory or disparaging towards the charity, its staff, volunteers, beneficiaries and/or supporters
 - vii. Posting photographs or images of staff, volunteers, beneficiaries or supporters without their explicit, informed consent.
- d) You must use your common sense and good judgement when posting, especially if your posts are visible to other people in the CLAPA Community. Statements can easily be misinterpreted, and disagreements can escalate quickly; if this happens, you should disengage and report the incident to your key contact at CLAPA, or any of the contacts listed at the end of this policy.
- e) Please do not use the CLAPA logo as your profile picture. We appreciate you wishing to raise awareness, but it is important for visitors to be able to distinguish between staff and non-staff members. As an alternative, you can use one of our official Twibbons on your profile picture - <http://twibbon.com/support/clapa-official-volunteer>. This does not apply to your cover photo or

other photos you post, but again it must be clear that you are a volunteer and not a staff member.

- f) You may include 'CLAPA' in your name if you have a separate volunteer account, but in these cases your profile picture must not be the CLAPA logo by itself, and your profile must make it clear you are a volunteer.
- g) Just because someone adds you as a friend does not necessarily mean they would like you to comment on personal posts! In general, we advise you to limit contact to within the CLAPA groups, private messaging, and statuses regarding cleft and CLAPA specifically.
- h) You should discuss with your Line Manager or key contact how best to keep these spheres – your personal online presence and your online accounts as a CLAPA volunteer – separate.

7. Use of Named Staff Accounts

- 7.1. Using separate named staff accounts allows staff to have an active presence on social media whilst maintaining an appropriate distance from their personal accounts. These should be used to engage with our supporters and service users in appropriate settings, to respond to questions and issues helpfully, and to promote the charity's work.
- 7.2. Staff should take the same security precautions with these accounts as they would for their CLAPA email accounts and report any breaches immediately.
- 7.3. Staff should write as themselves in their capacity as a staff member, much as they would in emails, in a friendly, approachable but professional manner.
- 7.4. You must use the 'CLAPA face' as your profile picture to make it clear you are a member of staff. If you frequently interact with the community face-to-face, you may use a photo of yourself, but should include the CLAPA logo within this photo and have 'CLAPA' as part of your name.
- 7.5. As we have little administrative control over Facebook accounts, please ensure:
 - a) Any important conversations are moved over to email as soon as possible
 - b) Screenshots are kept of anything you need to have on record.
 - c) Each group/page has at least two CLAPA staff as administrators.
 - d) Your Facebook login details are provided to your line manager should you leave CLAPA.
- 7.6. Any posts and statuses should be CLAPA-related and not include any inappropriate content (see section 9). Posts or comments should be encouraging, factual or corrective. Opinions, when posted, should remain positive, e.g. when commenting on a photo.

- 7.7. As usual, medical advice should not be given, but where medical information is shared it should be (where possible) from the CLAPA website or another reliable source.
- 7.8. Keep the personal information on your profile to a minimum – avoid including birthdays, home towns, etc. – and avoid making any link with your personal account.
- 7.9. Feel free to accept Friend and/or follow requests from people you know are involved with CLAPA and/or the cleft world, particularly those people you are involved with on a professional level, as this may make communication easier and more reliable, but if you are unsure then just ignore the request.
 - a) See ‘safeguarding’ section above for dealing with under-18s on Facebook.
 - b) Any friends you add will show up on your feed. Before commenting or replying to statuses, please make sure they are posting in a CLAPA group or have directly asked for cleft or CLAPA-related advice which you can provide.
 - c) Being ‘friends’ means someone can ‘tag’ you in a post, meaning you will get a notification directing you to the post itself. Please try to keep up with these and respond to them as soon as you can, even if it’s not in the CLAPA group.
- 7.10. When leaving CLAPA, you must provide your line manager with the login credentials to your staff social media account(s). These credentials will then be changed, and the account may be deleted or transferred to another staff member.

8. Staff Use of Charity Accounts

- 8.1. CLAPA’s charity accounts are the main pages and profiles through which we communicate with our followers, including our Twitter and Instagram profiles, Facebook page, and other profiles which are not individuals.
- 8.2. Only staff who have been authorised by the Communications and Information Manager to use these accounts may do so. This is typically only granted when advertising services and opportunities on social media is a core part of someone’s role.
- 8.3. These accounts should be protected by strong, unique passwords which are shared only as strictly necessary. Staff must not use a new piece of software, app or service with any of the charity’s social media accounts without approval from the Communications and Information Manager.
- 8.4. Staff posting on social media must take care to ensure the charity’s social media presence is consistent and cohesive. Wherever possible, posts should be edited and put together by the Communications Team member most responsible for posting.

- 8.5. New social media accounts in CLAPA's name must not be created unless approved by the Communications and Information Manager. CLAPA operates its social media presence in line with the Communications Strategy, which focuses our limited resources in the areas where they will have the most impact. If staff or volunteers believe there is a case for a new account or network to be considered, this should be raised with the Communications Manager.
- 8.6. Staff should only post updates, messages or otherwise make use of CLAPA's charity social media accounts when this use is clearly in line with the charity's objectives. For example, authorised staff may use CLAPA's social media accounts to:
 - a) Respond to questions and requests for help
 - b) Share news articles, case studies, reports, and other content created by CLAPA
 - c) Share insightful and relevant articles, videos, media and other content relevant to CLAPA's audience which has been created by others
 - d) Provide followers with an insight into what goes on behind the scenes at CLAPA
 - e) Promote upcoming events, opportunities and other offerings
 - f) Promote involvement with appropriate research projects advertised by CLAPA
 - g) Listen to, participate in, and encourage conversations.
- 8.7. Staff should not use the charity's accounts in inappropriate ways which include, but are not limited to, the following:
 - a) Sharing prohibited (see section 9) or irrelevant content, or take part in any activities which could bring CLAPA into disrepute
 - b) Sharing external content without reviewing it thoroughly and checking with senior staff as appropriate
 - c) Breaking confidentiality or expectations of privacy

9. Prohibited Content

- 9.1. Staff and volunteers must not create, post or share material that may be defamatory or incur liability for the charity. Prohibited content as referenced elsewhere in this policy includes both content which is deemed inappropriate and content which it is illegal to share, such as copyrighted content.
- 9.2. Inappropriate content includes, but is not limited to:
 - a) Pornography
 - b) Racial or religious slurs
 - c) Slurs
 - d) Information encouraging criminal skills, criminal activity or terrorism
 - e) Materials related to cults
 - f) Illegal drugs
 - g) Using social media for illegal or criminal activities

- h) Text, images or other media that could reasonably offend someone on the basis of race, age, gender identity, religious or political beliefs, national origin, disability or sexual orientation.
- i) Messages or material that could damage CLAPA's image or reputation
- j) Offensive, disrespectful or defamatory interaction with CLAPA's 'competitors', such as other charities working in the field of cleft.
- k) Discussion of staff, volunteers, beneficiaries or supporters without their approval
- l) Spam, junk email, or chain emails and messages

9.3. Copyrighted content must not be knowingly published or shared without permission from the copyright holder. Content from other sources may be shared if it is clear this is welcome, e.g. sharing buttons or functions on a web article, or a public social media post from another organisation.

10. Maintaining Confidentiality and Security

10.1. CLAPA Staff and volunteers must use their best judgement to ensure confidentiality is maintained and sensitive information is respected as they use social media. They must not:

- a) Share or link to content or information owned by CLAPA which could be considered confidential or commercially sensitive. This might include details of supporters or beneficiaries, information about unpublished strategies, or future marketing campaigns.
- b) Share or link to content or information owned by another charity, organisation or individual which could be considered confidential or commercially sensitive.
- c) Share or link to data in any way which might breach CLAPA's data protection and confidentiality policies.

10.2. Staff and volunteers may find themselves wanting to share information, photos and/or conversations with others on personal social media profiles. This may be a particularly positive interaction they've had in their role or a post in a CLAPA group which they would like to share with their personal network. In these cases:

- a) Written permission must always be sought from the individual it concerns and/or the individual who made the post. Where there are multiple individuals involved or featured, permission must be sought from each person. Care must be taken to ensure they fully understand the implications of a post or other information being shared, including who it will be visible to and who may be able to share it beyond this network.
- b) This written permission must be available to pass on to CLAPA upon demand, and/or be clearly visible on the post itself (e.g. you've commented asking for permission and they've replied with an agreement).
- c) It must be made clear at the point of sharing this content that permission has been obtained.

- d) Identifying or contact information (such as full names, addresses, phone numbers, emails, etc.) must never be shared unless you have explicit written permission and there is no realistic alternative, e.g. when inviting others to participate in a volunteer's project.
- e) If in doubt, consult CLAPA's Data Protection and Confidentiality Policy, speak to CLAPA's Communications & Information Manager, or simply do not share this content.

10.3. Staff and volunteers must be aware of scams and phishing attempts, and take the same kinds of precautions as they would for their own email accounts. Breaches should be reported immediately to the social network and in serious cases to the Communications & Information Manager. Precautions include:

- a) Avoiding clicking links in posts, updates and messages that look suspicious.
- b) Double-checking any posts, profiles, updates or messages that look suspicious.
- c) Never revealing sensitive details through social media channels, including in private messages. These should be restricted to email or phone conversations in line with CLAPA's Data Protection and Confidentiality Policy.
- d) Verifying the identity of individuals before sharing information.
- e) Blocking and removing spammers and 'bots' from groups.

11. Facebook Groups and Pages Administration Policy

11.1. This section lays out CLAPA's policy for administrating our Facebook Groups and Facebook Pages. It explains how we run these groups and why, the kind of content which is and isn't allowed, and what actions will be taken in case of breaches.

11.2. The Communications Team are in charge of updating CLAPA's social media pages and profiles to ensure a consistent voice. In the Groups, they are responsible for correcting errors, preventing spammers, and taking steps as appropriate to enforce CLAPA's content policy laid out below. CLAPA staff may support these efforts if they are confident in their ability to do so in line with CLAPA's policies.

11.3. To discourage spammers and preserve privacy, CLAPA's official groups are 'Closed', meaning members must request to join and answer questions about their connection to cleft before they are approved by an administrator. Accepting members to the group is at the administrators' discretion based on what they believe will best uphold the purpose of the group in question, taking into account this policy, safeguarding concerns, and other factors.

- a) To join the group, members must be living in the UK, have their/their child's treatment within the UK, or be an expat; and have a personal connection to cleft which matches the group's purpose.
- b) Health professionals, researchers and others without a personal connection are not permitted.
- c) Friends are typically not permitted to join unless they state a strong, 'family-like' involvement in the life of someone born with a cleft.

11.4. The groups exist to allow people with and affected by cleft to give and receive mutual support. The content policy outlined here is intended to ensure these groups remain friendly, supportive, reassuring environments for new and existing members alike, where interactions are positive and polite and where disagreements can be dealt with respectfully. In line with this, the following content is prohibited:

- a) **Content irrelevant to cleft and related conditions, and/or CLAPA.** Good judgement should be used when considering the intentions behind such posts, but as a general rule these are not allowed as they will distract from the purpose of the group. An example of this might be promoting a business unrelated to cleft or CLAPA. Sensationalist or ‘tear-jerker’ posts about animals with a cleft are considered irrelevant.
- b) **Posts seeking to fundraise for other charities.** It is our policy not to allow fundraising posts for other charities (including hospital charities) unless a proportion of the funds are going to CLAPA.
- c) **Spam or phishing content.** Occasionally a spam or phishing account may gain access to the group and start to post advertisements, links to shops or other clearly irrelevant things. Administrators should immediately block and report these posts and the account that made them.
- d) **Offensive posts.** Posts which are considered likely to cause offense on the grounds of protected characteristics (race, religion, gender, etc.), or which target people affected by cleft or visible differences, will be removed. Repeat offenders will be removed from the group.
- e) **Discussions which become inflammatory.** Any discussions which have the potential to cause arguments should be monitored carefully. Maintaining the supportive atmosphere of these groups is our primary concern when making decisions like this, not whether or not an admin’s action is ‘fair’ to those involved or in line with ‘free speech’. These are support groups run by CLAPA as a charitable service; they are not open discussion groups, and are not an appropriate forum for arguments. Particularly inflammatory comments may be hidden or removed. If the situation escalates, entire posts may be removed, and a temporary ban placed upon discussion of this topic. An administrator should explain why this action has been taken.
- f) **Deliberately inflammatory posts.** Posts that appear to be stirring up negativity, contain personal attacks on others, or are otherwise inflammatory, will be removed.
- g) **Negative posts concerning Cleft Team and clinicians.** While we understand some members may wish to use these groups as a way to vent frustration or other negative feelings around their/their child’s care, naming (or otherwise identifying) health professionals in negative posts is strictly prohibited, as these can cause undue worry to new and expectant parents, can damage CLAPA’s relationship with health professionals, and are generally unconstructive. Posts will be removed without warning and the poster messaged with an explanation, and, if appropriate, asked to contact Patient Advice and Liaison Service (PALS) and/or the Cleft Team with their issue. It will be at the administrators’ discretion whether or not a post warrants action on these grounds.
- h) **Complaints about CLAPA, including about specific staff or volunteers.** A support group is not the appropriate forum to air or discuss complaints of this nature. CLAPA has a transparent and

robust complaints policy and procedure available on our website. We fully encourage anyone with a complaint or concern about any area of our work, or any specific staff member or volunteer, to get in touch directly to let us know.

- i) **Specific medical advice.** Group members will inevitably share their experiences of care and what worked for them and/or their child, but these posts must be carefully monitored to ensure no specific medical advice is given. This is the difference between 'X bottles worked well for us' and 'You should use X bottles'. Members should always be directed back to their Cleft Team and/or CLAPA's website for information.
- j) **Touting of private health/health related services.** Using CLAPA's Facebook groups to promote private healthcare services (free or paid) is not permitted as per our Private and Non Cleft Team Services Policy.
- k) **Personal contact details, and/or photos of others (or other people's children).** Photos must never be shared without explicit, written consent from the subject(s) and/or their parents/carers, and personal contact details such as phone numbers or email addresses must never be shared on the group. If members wish to swap details, they must do so through private messages.

11.5. **Volunteer Administrators** are recruited from CLAPA's trained Parent & Peer Supporters. Their role is to monitor the groups for the kind of prohibited behaviour outlined in this policy, and alert CLAPA staff to potential and actual issues. Over weekends and evenings, it may be necessary for volunteer administrators to take action and remove comments, posts or even members to ensure the group remains on-topic, respectful and supportive. In these cases, they should identify themselves as a volunteer administrator and cite CLAPA's social media policy when taking action.

11.6. Administrators should use their best judgement when deciding how a particular situation should be handled, taking into consideration the intention behind a post and safeguarding issues as well as the above rules. Generally speaking, members should not be banned without serious cause, and efforts should be made to help them understand why our rules and guidelines are in place.

11.7. On rare occasions, the decisions administrators make may spark arguments or anger. Aside from reiterating CLAPA's social media policies and stating the reason for an action being taken, administrators should take care not to be drawn into discussions about their actions and ask that any questions or objections are directed to the Communications & Information Manager via email. As stated in this policy, CLAPA's Facebook support groups are not the appropriate place for heated discussions or arguments.

11.8. **Creating new volunteer-run groups and pages.** In some cases, smaller regional groups will be created to allow for more focused discussion. This section explains how these are run.

- a) Approval must always be sought from the Communications & Information Manager before a new CLAPA Group or Page is created. This will ensure we don't duplicate groups, that they are branded correctly, and that we have enough staff members as administrators. In general, new Pages will not be approved unless a convincing case can be made that it is necessary and that there is enough content to keep it going.
- b) All CLAPA Groups and pages must have the Communications & Information Manager and the Communications & Regional Support Officer as administrators. Other staff involved with the group should also have administrator status.
- c) Facebook Groups should all be set as 'Closed' or 'Private', and have a set of questions devised by the Group's creator to ensure only qualifying members are allowed in.
- d) The group's description and a pinned post should both include information about CLAPA, the group's purpose, safeguarding privacy and photos online, and a link to CLAPA's social media policies. The pinned post on CLAPA's Parents Support Group can be used as a template.

12. Resources & Contacts

CLAPA's Facebook Group Guidelines: <https://www.clapa.com/support/online-support/facebook-group-guidelines/>

Privatised Treatment Policy: <https://www.clapa.com/treatment/externalhealthservices/>

For **day-to-day issues** with social media, contact the Communications and Regional Support Officer.

For discussions **about this policy** in general, or to **escalate** an issue, contact the Communications and Information Manager.

Safeguarding concerns should be reported to safeguarding@clapa.com in accordance with our Safeguarding Policies. A copy of these policies and procedures and the most up-to-date list of Safeguarding leads can be found here: www.clapa.com/safeguarding/