



**London Borough of Hillingdon
Children's Social Care**

Safe and appropriate use of WhatsApp Policy

Policy Statement

WhatsApp is an instant messaging app which allows the user to send and receive messages, images and videos in one to one and group chats with their WhatsApp contacts. Both the sender and receiver need a WhatsApp account to use the service. WhatsApp is free to download and the user needs to be connected to the internet or mobile data to use the functions of the app. Users set a WhatsApp name and can choose an optional profile picture and status. Through WhatsApp, users have the option to display when they were last online and if settings permit, can see when others were last online. Users can choose to share live location, broadcast messages to contacts, archive and delete message from contacts. The minimum age of use for WhatsApp is **16 years old**.

London Borough of Hillingdon Children's Services promotes communication methods based on the needs of young people and for those communications to take place in a safe way. WhatsApp is available for staff to use with service users over the age of 16. It is also permitted for use between staff. Video contact with the children, young people and their families should be conducted using Hillingdon's preferred option (Microsoft Teams). However, during the lockdown and the recovery period when Teams cannot be used and the young person is 16 years old or above, WhatsApp will be used. When using WhatsApp, staff will be complying with all the safeguarding rules that apply to any other video communication.

This policy sets out the appropriate terms of use for WhatsApp and the expectations of staff when communicating with young people or other staff members.

Who this Policy applies to

This policy applies to all Employees, Volunteers, Casual Workers, Agency Workers and/or contractors are expected to work in accordance with this policy.

The use of WhatsApp with children and families is permitted only on LBH issued devices. WhatsApp on LBH issued devices should not be used for personal use unless express permission from line manager is provided.

Core Policy Principles

1. Data Security



LBH recognise the value of WhatsApp as a tool in communicating with young people and promoting their wellbeing. WhatsApp is accessible using mobile data or over Wi-Fi. It is viewed as being a secure method of communication due to its end to end encryption. However, there are challenges in how its use can be reconciled with data security as follows:

- There are no audit logs and no access of any type to usage evidence should the application be used inappropriately. As part of GDPR data controllers are required to be able to audit who has access to data.
- It is known that perpetrators of sexual abuse will try to identify weak areas within organisations that they can exploit. WhatsApp could be used for grooming children or young people or to distribute inappropriate material and there would be no means of investigating this. All other communication channels currently sanctioned within LBH have some level of auditing capability, including text messaging.
- There is no way of us systematically implementing a “right to be forgotten” request. This is particularly relevant for video calls especially if they are recorded.
- We are unable to meet our Subject Access Request enquiries that have included requests for messages because of the end to end encryption that makes this impossible to deliver.
- Whilst videos and images are stored on the WhatsApp database server by default, as a result of individual device settings it is possible for videos to be unintentionally stored or backed up on the device or back up locations, therefore service users should be directed to LBH’s preferred tools that enable safe communication with service users (MSTeams.)

2. Appropriate use of WhatsApp

- 2.1 The use of WhatsApp with children and families is permitted only on LBH issued devices. WhatsApp on LBH issued devices should not be used for personal use unless express permission from line manager is provided.
- 2.2 Age restrictions on the application indicate that no young person under the age of sixteen should use WhatsApp. Therefore, LBH staff should only use WhatsApp to communicate with young people when they are aged sixteen years or over.
- 2.3 LBH should communicate with service users through WhatsApp when it is considered the safest, most reliable, effective and efficient method of communication.
- 2.4 WhatsApp should not usually be the standard means of communicating with young people, care should be taken to consider other forms of communication with service users. A decision should be made about the appropriateness of using WhatsApp on a case by case basis.



- 2.5 The decision to use WhatsApp with the young person should be made through discussions with the young person and LBH staff member with support of the staff member's line manager if required.
- 2.6 If a child or young person under the age of sixteen makes contact with an LBH staff member through WhatsApp, the staff member will respond using LBH email or via text message or call through his/her work phone. Information will be provided to the young person on why it is not appropriate for them to communicate via WhatsApp due to the age restrictions associated with the application.

3. Using WhatsApp safely with service users

- 3.1 LBH staff must consider the appropriateness of using WhatsApp with service users, taking into account the young person's individual needs and circumstances.
 - 3.2 WhatsApp should never be used when it is felt that it may place the young person at risk. For example, if using WhatsApp to communicate with a young person in a relationship with an abusive partner who has access to their phone.
 - 3.3 Where there is uncertainty or where there are concerns regarding the appropriateness of using WhatsApp this should be discussed with the staff members' line manager, who will provide support and advice regarding the appropriateness of using WhatsApp with a young person.
 - 3.4 When using WhatsApp with young people, LBH staff should **always** ensure that their location services are switched off.
 - 3.5 LBH staff members are encouraged to set their status on WhatsApp to indicate to users when they are in work and not in work to help maintain professional boundaries.
 - 3.6 LBH staff should decline any invitation to engage in group chats on WhatsApp by young people.
 - 3.7 Group chats between young people and staff are permitted when initiated by an LBH staff member for appropriate work purposes, and where all members of the group have provided consent prior to the group being set up.
 - 3.8 LBH staff members must take care not to reveal personal information about themselves while using WhatsApp and ensure they maintain professional boundaries at all times when communicating with young people and other staff members through WhatsApp.
 - 3.10 LBH staff are asked to discourage young people from sending images or videos by when using WhatsApp to communicate.
 - 3.11 LBH staff members should never 'broadcast' messages to contacts using WhatsApp.
- If an LBH staff member receives a message, an image or video through WhatsApp about something which they are concerned about or feel is inappropriate, s/he should alert the line manager as soon as possible. It is important that staff do not share images which may be considered inappropriate or depict abuse or harm to a child unless authorised by the relevant agency. In all instances, if there is a



safeguarding concern staff must follow the relevant procedure within the [London Child Protection Procedures](#).

LBH staff members are not expected or encouraged to continue communications with young people outside of usual working hours. If staff become aware or receive information through WhatsApp that suggests a young person or adult is at risk of harm, they should follow immediately contact their line manager / Head of Service and following the relevant safeguarding [procedure](#). There is a on call Head of Service available via EDT by calling 01895 250111. If it is felt there are immediate concerns or risk to life please contact 999.

4. Using WhatsApp safely with staff

- 4.1 Group chats between staff members are permitted. However, communication through WhatsApp with other LBH staff members should only be used for non-confidential matters.
- 4.2 LBH staff members must take care not to reveal any personal information about an individual young person, or parent/carer when engaging in conversations through WhatsApp with other staff members, foster carers or volunteers.
- 4.3 Personal information such as service user names should never be used during WhatsApp conversations with other staff members. If referring to a specific service user is unavoidable, the service user should be referred to in anonymised form.
- 4.4 Images containing confidential material should not be exchanged between staff, examples of this include images of documents that includes children's information or images of children.
- 4.5 If a LBH staff member receives a message, an image or video through WhatsApp about something which they are concerned about or feel is inappropriate, from a staff member, foster carer, volunteer or other person connected with LBH, s/he should alert her/his line manager as soon as possible. It is important that staff do not share images which may be considered inappropriate or depict abuse or harm to a child. In all instances, if there is a safeguarding concern staff must follow the relevant procedure within the [London Child Protection Procedures](#).

5. Record Keeping

- 5.1 All records of communications with young people through WhatsApp should be maintained and securely destroyed in line with LBH's [recording policy](#).
- 5.2 WhatsApp conversations with service users should be retained on LBH devices for "as long as is required."
- 5.3 The decision to use WhatsApp and all conversations through WhatsApp with service users should be summarised and recorded on the case file running record, as would any other conversations.

6. Safeguarding



- 6.1 Any concerns of a safeguarding nature relating to a child, young person or adult at risk, should be acted upon under the relevant procedure within the [London Child Protection Procedures](#).
- 6.2 Any concerns of a safeguarding nature relating to a staff member's misuse of WhatsApp relating to a child or adult considered at risk should be acted upon. Further guidance in respect of reporting and managing [Allegations Against Staff or Volunteers, who work with Children \(londoncp.co.uk\)](#)
- 6.3 When using WhatsApp, LBH staff members must always ensure that usual professional boundaries are upheld within contact with young people or other staff. Any concerns regarding professional boundaries not being maintained, for example regular contact with young people or parents taking place outside of working hours without prior authorisation, or contact with service users involving friendships or social meetings, will be considered the London Child Protection Procedures, [Allegations Against Staff or Volunteers, who work with Children \(londoncp.co.uk\)](#)

7. Boundary Setting

- 7.1 The practitioner, with support of line management where required, will take responsibility for the decision as to whether the young person can be effectively communicated with and supported using WhatsApp.
- 7.2 The practitioner will hold responsibility in ensuring appropriate boundaries are set and maintained when communicating through WhatsApp, as with all other aspects of the professional working relationship.
- 7.3 The practitioner will provide the young person with clear expectations around the immediacy of response they should expect to receive when communicating through WhatsApp and appropriate terms of use.
- 7.4 In all instances, where practically possible, LBH staff will begin WhatsApp conversations with young people by sending the message outlined below, to help ensure clear terms of use and appropriate boundaries are set:

"I need to make you aware that there may be a need to share information to ensure you or others are safe. I will record a summary of our conversations over WhatsApp in your records. Please avoid sending pictures or videos via WhatsApp to me, unless this has been discussed and agreed."

- 7.5 The boundaries set at this stage will help to ensure that that the nature of the relationship, remains on a professional level.

8. Further Points of Support

- 8.1 If you require further support, guidance or clarification on any aspect of this policy and guidance, please contact your line manager, details of associated policies can be found in the appendix below.



Appendix

[Hillingdon ICT standards and policies](#)

[Hillingdon policies and procedures](#)

[London Child protection procedures](#)

Online safety tips, advice and resources

www.thinkuknow.co.uk

www.saferinternet.org.uk/

[Online Safety Resource Centre - London Grid for Learning \(lgfl.net\)](#)

[Childnet - Childnet](#)