



COMMUNICATION & SOCIAL NETWORKING POLICY

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COMMUNICATION & SOCIAL WORKING POLICY

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1. Introduction to the Policy

This policy sets out the framework, principles, and procedures that **Byram House** follows regarding children's and young people's correspondence, communication, and use of social networking sites. The policy applies to all staff, agency workers, volunteers, and contractors working at Byram House, whether at 62 Deighton Road, 66 Deighton Road, or elsewhere.

The Home is Byram House, which comprises the two residences at 62 Deighton Road and 66 Deighton Road. This policy applies equally across both residences.

Children and young people have the right to maintain family and friendship links, but this must be balanced with their safety and welfare, the safety of others, and the requirements of any court orders or care plans. This policy is based on **Regulation 22(3)(a)** of the Children's Homes (England) Regulations 2015, which requires that children be provided with access to a telephone (in private) at all reasonable times.

The objectives of this policy are to:

- Comply with the **Children's Homes (England) Regulations 2015 (Regulation 22)**, the **Online Safety Act 2023**, the **Data Protection Act 2018 & UK GDPR**, and **Working Together to Safeguard Children 2026**.
- Promote and facilitate positive contact with families and friends (where in the child's best interests).
- Protect children from cyberbullying, online grooming, exploitation, and other risks associated with social networking and mobile communications.
- Provide clear guidance on placement planning for communication, restrictions, and the lawful withdrawal or confiscation of devices.
- Ensure that any restrictions on communication are proportionate, reviewed regularly, and documented.

This policy must be read in conjunction with the **Internet Policy for Adults, Children and Young People**, the **Safeguarding Policy**, and the **Code of Conduct and Ethics Policy**.

2. How this Policy Benefits the Home

This Correspondence, Communication and Social Networking Policy benefits Byram House in the following ways:

- **Legal Compliance** – It meets duties under **Regulation 22(3)(a)** of the Children's Homes Regulations 2015 (access to a telephone), the **Online Safety Act 2023** (duty to protect children from online harms), and the **Data Protection Act 2018** (privacy rights).
- **Child Protection** – It balances children's rights to communicate with the need to protect them from significant harm (e.g., grooming, exploitation, cyberbullying). It provides a framework for restricting or confiscating devices where there is a risk of harm.
- **Clarity for Staff** – It defines when restrictions may be imposed, the process for withdrawal or confiscation, and the required notifications to social workers and managers.
- **Deprivation of Liberty Safeguards** – It recognises that reducing access to communication may, in extreme cases, amount to a deprivation of liberty and requires consultation with the placing authority and legal advice.
- **Inspection Readiness** – The **Social Care Common Inspection Framework (SCCIF) 2026** expects the home to manage risks from online communications. This policy provides clear evidence.
- **Training Framework** – It sets out annual training for staff on online safety, confiscation procedures, and supporting children's safe use of social media.

3. Definitions & Legislation

3.1 Definitions

Term	Definition
Home	Byram House, the children's home registered with Ofsted, comprising two residences at 62 Deighton Road and 66 Deighton Road.
Company	IMS Care LTD, the registered provider and legal entity responsible for operating Byram House.
Byram House	The name used throughout this policy to refer to the home and its staff.
Correspondence	Written communication, including letters, cards, notes, and printed emails.
Telecommunication	Voice calls, text messages (SMS), instant messaging (WhatsApp, Messenger, etc.), and video calls.
Social Networking	Online platforms that allow users to create profiles, share content, and interact (e.g., Facebook, Instagram, TikTok, Snapchat, Discord).
Reasonable Times	Times agreed in the child's ISP / Placement Plan, typically outside school hours and before bedtime, allowing for privacy.
Significant Harm	The threshold under the Children Act 1989; includes harm from online grooming, cyberbullying, or exploitation.
Confiscation	The lawful removal of a child's personal device where there is a risk of significant harm or criminal offence.

3.2 Key Legislation and Statutory Guidance

Legislation / Guidance	Key Provisions	Relevance to this Policy
Children's Homes (England) Regulations 2015 – Regulation 22(3)(a)	Requires that children are provided, at all reasonable times, with access to a telephone on which to make and receive calls in private.	The home must provide a landline or alternative (e.g., a home mobile) for private calls.
Online Safety Act 2023	Fully implemented 25 July 2025. Requires regulated services to protect children from illegal and harmful content.	The home must educate children about online risks; restrictions may be imposed if a child is at risk of online harm.
Human Rights Act 1998 – Article 8	Right to respect for private and family life, home, and correspondence.	Restrictions on communication must be lawful, necessary, and proportionate.
Children Act 1989 – Section 47	Duty to investigate where a child is suffering or likely to suffer significant harm.	If communication (e.g., via social media) exposes a child to significant harm, the home must act.
Data Protection Act 2018 & UK GDPR	Governs processing of personal data, including monitoring of communications.	Any monitoring of children's communications (e.g., checking messages) must have a lawful basis.
Working Together to Safeguard Children 2026	Emphasises multi-agency response to extra-familial harms, including online exploitation.	The home must work with police and safeguarding partners if online harm is suspected.

Social Care Common Inspection Framework (SCCIF) 2026	Inspects how the home manages risks from online communications and social networking.	Inspectors will review placement plans, ISPs, and records of restrictions.
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4. The Policy

4.1 Policy Statement and Key Principles

Byram House will:

- **Promote and facilitate** positive contact between children and their families, friends, and significant others, unless restricted by court order or care plan.
- **Provide access to a telephone** at all reasonable times (including a landline or a home-provided mobile) for private calls, as required by Regulation 22(3)(a).
- **Support children** to use social networking and online communications safely, in line with the Internet Policy.
- **Inform children** of their right to contact their placing authority, IRO, independent advocate, Ofsted, or the Children's Rights Director if they have concerns about their safety or welfare.
- **Balance rights with safety** – Children do not have an absolute right to access all forms of communication at all times. Restrictions may be imposed where there is a risk of significant harm, serious property damage, or a criminal offence.

Key principle: Any restriction on communication must be:

- **Proportionate** – not more than necessary to protect the child or others.
- **Time-limited** – reviewed regularly.

- **Agreed** with the placing authority (except in emergencies, where they must be notified within 24 hours).
- **Documented** in the child's ISP and Placement Plan.

4.2 Placement Planning – Establishing Communication Agreements

Before or immediately upon admission, the Registered Manager must ensure that the child's **ISP and Placement Plan** address:

- Whether the child is permitted to have a personal mobile phone, tablet, or other device.
- Any restrictions on use (e.g., no access to certain social media platforms, supervision required, time limits).
- Whether the child is allowed to receive letters, emails, or packages from family and friends (and any restrictions).
- The contact arrangements with family, friends, and others (as set out in the Contact Consent form).
- The arrangements for access to a home-provided telephone for private calls if the child's personal device is unavailable.

Where possible, the child should be involved in forming these agreements. A **contract for safe internet and mobile phone use** (age-appropriate) may be used to encourage shared responsibility.

4.3 Emergency Placements

If a child is placed in an emergency (without prior planning), they will:

- Be permitted only **supervised telephone contact** with family and friends.
- **Not be permitted** to retain a personal mobile phone or device until an **Emergency Review** is conducted (within 72 hours of placement) and a Placement Plan is drawn up.
- Once the plan is in place, communication arrangements will be reviewed and, where appropriate, relaxed.

4.4 During the Placement – Access to Communication

Reasonable times: Each home will specify within its daily routines when “reasonable times” for communication occur (e.g., after school until 9pm, with allowances for homework and meals). The home must provide:

- A landline telephone (or home-provided mobile) for private calls at reasonable times.
- Access to a computer or tablet for schoolwork and (where agreed) for social networking.

Children with their own devices: Children may use their own mobile phones, tablets, or laptops only if agreed by the placing authority (in the Placement Plan/ISP) and the Registered Manager. The ISP must specify:

- Whether the device may be kept in the child’s room overnight.
- Whether supervision is required.
- Any restrictions on social media or apps.

The home will not charge children for using the home telephone for essential calls (e.g., to social worker, family).

4.5 Restrictions, Withdrawal and Confiscation of Devices

The Registered Manager may **withdraw** a child’s mobile phone or other device (even one owned by the child) if there is a reasonable belief that the device is being, or is likely to be, used to:

- Place the child or others at risk of **significant harm** (e.g., online grooming, cyberbullying, child sexual exploitation).
- Cause **serious damage to property**.
- Commit a **criminal offence**.

Procedure for withdrawal (non-confiscation):

1. **Attempt agreement** – Explain the concern and ask the child to voluntarily hand over the device for a specified period (e.g., 24 hours).
2. If the child refuses, the Registered Manager (or senior staff member) may remove the device using the same principles as for **searching without consent** (see Searching the Belongings of Children Procedure). No force should be used unless there is an immediate risk of harm.
3. The device must be stored securely (e.g., locked cupboard) and a receipt given to the child.
4. The Registered Manager must notify the child's social worker within **24 hours** (or within one working day if a weekend).
5. The decision and duration of withdrawal must be recorded in the child's daily record and ISP.

Confiscation: If the Registered Manager considers that the device will be used to cause continuing risk of significant harm, or if the device is suspected to be stolen (not owned by the child), the device may be **confiscated** and:

- Passed to the police (if suspected stolen), or
- Retained by the home until the child can demonstrate responsible use (with a risk assessment).

The child must be given a receipt. Confiscation decisions must be agreed with the placing authority.

Restriction of other communications: If the risk relates to letters, emails, or telephone calls (rather than a device), the Registered Manager may, in consultation with the placing authority, restrict or redirect communications. This might include:

- Intercepting and reading letters (only if court order permits or with parental consent).
- Monitoring emails (with consent and lawful basis).
- Restricting the times or duration of calls.

Any such restriction must be proportionate and reviewed at least monthly.

4.6 Seizure and Confiscation Procedures

When a device is removed (whether by agreement or not), the following must be recorded:

- Date and time of removal.
- Reason for removal (specific risk identified).
- Whether the child agreed or objected.
- Where the device is stored (e.g., locked cupboard, police).
- Expected duration of removal (if known).
- Notification to social worker and (if applicable) police.
- Receipt given to the child (signed by staff and child, if possible).

Review: Any restriction on communication (including withdrawal of a device) must be reviewed:

- Within 72 hours (by the Registered Manager).
- At the child's next statutory review (or sooner if requested by the child or social worker).

If restrictions continue beyond 28 days, the Registered Manager must convene a review meeting with the placing authority to assess whether the restriction remains necessary and proportionate.

4.7 Deprivation of Liberty Considerations

If a child is **prevented from having access to a telephone** or other means of communication entirely (or to such an extent that they are effectively unable to contact family, legal representatives, or independent advocates), this may amount to a **deprivation of liberty** (Article 5, Human Rights Act 1998) or a breach of Article 8.

In such cases:

- The Registered Manager must immediately consult the child's social worker and the Responsible Individual.
- Legal advice must be sought on whether a **Deprivation of Liberty (DoL) order** is required.
- The restriction will not be imposed unless authorised by the placing authority and (where required) a court.

Note: Routine restrictions (e.g., no mobile phone after 9pm, supervised calls) are unlikely to amount to a deprivation of liberty.

4.8 Recording and Notification

- **Daily record** – Any withdrawal or restriction must be recorded in the child's daily record on Clear Care.
- **Incident report** – If the withdrawal involved a conflict, refusal, or required physical intervention, an incident report must be completed.
- **Notification to social worker** – Within 24 hours (or next working day) of any withdrawal or confiscation.
- **Notification to Ofsted** – If the restriction is part of a serious incident (e.g., child was at grave risk of exploitation), a Regulation 40 notification may be required (see Notifications Policy).

The child's ISP must be updated to reflect any ongoing restrictions.

5. How the Home Trains its Staff About this Policy

Byram House provides structured training to ensure all staff understand and can implement this Correspondence, Communication and Social Networking Policy effectively.

Training Element	Frequency	Method / Content
Induction	Upon appointment	Face-to-face training covering: Regulation 22(3)(a) (telephone access), the balance between rights and safety, placement planning for communication, emergency placement rules, withdrawal and confiscation procedures, recording requirements, DoL considerations, and the dual-site operation (62 & 66 Deighton Road).

Annual refresher	Every 12 months	Classroom or virtual session covering updates to legislation (Online Safety Act 2023, SCCIF 2026), case studies on online harm, and refresher on confiscation procedures.
Online safety training	Annually	Training on recognising online grooming, cyberbullying, and exploitation, and how to have safe conversations with children about social networking.
Legal framework for restrictions	At induction and biennially	Training on Article 8 (right to private life), Deprivation of Liberty, and when to seek legal advice.

Staff are required to:

- Read and sign this policy annually.
- Complete all mandatory training.
- Never restrict a child's communication without a clear risk assessment and (where possible) agreement from the placing authority.
- Immediately report any risk of online harm to the Designated Safeguarding Lead.

6. Related Policies and Guidance

- Internet Policy for Adults, Children and Young People
- Safeguarding Policy
- Missing From Care Policy

- Police Involvement Policy
- Parental Responsibility, Legal Status, Delegated Authority and Consent Policy
- Searching the Belongings of Children Procedure
- Data Protection Policy
- Children's Homes (England) Regulations 2015 (Regulation 22)
- Working Together to Safeguard Children 2026
- Social Care Common Inspection Framework (SCCIF) for Children's Homes 2026
- Online Safety Act 2023 – Ofcom Children's Safety Codes

7. Policy Approval and Review Details



Home	Byram House	
Reviewed by	Danyaal Iqbal / Mustafa Amin	Deputy Manager / Registered Manager
Approved by	Stacey Wagstaffe	Responsible Individual
Date	May 2026	