

Online Safety Policy and Procedure

(forms part of the Fleet Education Services Safeguarding and Child Protection Policy and Procedure)

Introduction

Fleet Education Services is committed to providing the highest standard of safeguarding both for online and in-person tuition. Online tuition is defined as when the tutor teaches the student remotely using software approved by the client and Fleet Education Services. In person tuition is defined as when the tutor and student are in the same room either at the home or another agreed venue.

The use of technology exposes different challenges and risks that young people, staff and tutors could be exposed to. These include abuse. It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Fleet Education Services will adopt a company-wide approach to online safety which will empower, protect, and educate our learners, staff and tutors in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

We will ensure online safety is reflected as required in all relevant policies. When devising and implementing our policies and procedures and planning, staff training, incorporating the role and responsibilities of the DSL, online safety is considered as a running and interrelated theme.

Fleet Education Services recognises that technology, and the risks and harms related to it, evolve and change rapidly. We will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks faced by our learners.

The DSL has overall responsibility for online safeguarding within Fleet Education Services & will respond to online safety concerns in line with the Safeguarding & Child Protection Policy but will liaise and seek guidance as necessary with other members of staff. Where necessary, concerns will be escalated and/or reported to relevant partner agencies in line with our policies and procedures. Internal sanctions and /or support will be implemented as appropriate.

Categories of Risk

Fleet Education Services identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas as outlined in KCSIE 2022

- **Content** - being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact** - being subjected to harmful online interaction with other users; for example: peer to peer abuse, including cyberbullying, and the use of mobile and smart technology, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct** - personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and non-

consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying;

- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Fleet Education Services range of technology includes computers, mobile phones, laptops, tablets and other digital devices, the internet, our learning platform, and email systems.

This Online Safety Policy aims to:

- Ensure all tutors have read and understood the Safety Online Policy & Procedure
- Ensure that tutors, students, and parents/carers can use Fleet Education Services online tuition platform and their own devices safely within UK law and educational safeguarding standards
- Ensure all Fleet Education Services owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- Safeguard all students whilst delivering tuition online and in accessing resources online which supplement tuition
- Protect the tutor as well as the student
- Enable the tutor to apply all aspects of Fleet Education Services' Safeguarding Policy and Procedure when providing online tuition
- Ensure that tutors only use the online tuition software and platform as authorised by Fleet Education Services and clients, in order to protect students and tutors
- Ensure that tutors providing in person tuition whilst using a laptop or other device, use the device in a safe and responsible way
- Recognises the specific risks that can be posed by mobile technology, including mobile phones.

Online remote tuition

- Fleet Education Services will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- Staff /Tutors will ensure all communication with learners and parents/carers will take place using communication channels either provided or approved by Fleet Education Services e.g. email accounts, phone numbers and/or agreed systems, Fleet online platform.
- In the event that compliance is not possible this should be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with the Fleet Education Services Code of Conduct & Acceptable Use as outlined in the Safeguarding & Online policies
- Fleet Education Services will do all we possibly can to limit children's exposure to online risks through our IT systems and will ensure that appropriate filtering and monitoring systems are in place.
- Access to our Online platform is accessed via a link to the parent/carers who create and enter an email address, which can only be accessed by learner and tutor via the platform. This is held securely but provides a recorded communication channel for learner and tutor.

The entire session is also recorded and is stored securely. It is available for viewing by the DSL/DDSL's for safeguarding purposes

- If learners or staff discover unsuitable sites or material, they are required to immediately advise the child to log off/then do the same, call parent /carer immediately to ensure this has been done, then report to Fleet Education Services' Designated Safeguarding Lead (DSL). Staff/tutor must not log back in until advised it's safe to do so by the DSL.
- All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights and privacy legislation.

Filtering & Monitoring

- Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL and/or technical staff, as appropriate.
- Any access to material believed to be illegal will be reported immediately to the appropriate agencies and the police.
- When implementing appropriate filtering and monitoring, the company will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- Fleet Education Services acknowledges that whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety.
 - Learners' internet use will be supervised by staff according to their age and ability.
 - Learners will be directed to use age-appropriate online resources and tools by tutors.
- Fleet Education Services will support and encourage all learners to learn about and manage online risks
- Online safety training will be incorporated into all Safeguarding Training for all staff/tutors and is integrated, aligned and considered as part of our overarching safeguarding approach.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our Safeguarding and other relevant policies.
- When delivering remote learning, staff will follow our Online Guidelines.
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access
- We will continue to ensure parent/carers know who their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

ONLINE PROCEDURES

1.0 Fleet Education Services Online Tuition Platform

The safety and well-being of students and tutors is of the highest importance to Fleet Education Services. Tutors must not use other software or platforms that are not authorised by Fleet Education Services for online tuition.

Safeguarding features on Fleet Education Services' Online Tuition Platform are as follows:

- All tutors must be recruited in line with safer recruitment and vetting processes, prior to being allowed to register for online tuition. Once registered, there is an additional approval process via Fleet Education Services Business Support Team access is granted to the Online platform. All information is held privately and securely within the platform, including email address and telephone number in line with GDPR
- Prior to learner usage, parent/carers are invited to register them and connect them with their tutor(s). Both email address and date of birth for learners are required for access. If the parent/carer prefers not to provide birth date, any day and month can be added but they must ensure the year is relevant to the age of the learner. All information is completely confidential, including email address and telephone number; the only details visible within the platform are the first name and surname initial.
- Timings and duration of lessons are logged; the start time begins when both tutor and learner enter the online classroom. Written communication between tutor and learner takes place on the platform and is accessible by Fleet Education Services for the purposes of safeguarding and quality control. This information is available to parent/carers simply by logging in, using the details provided to them at the time of registration.
- Lessons are recorded for the purposes of safeguarding and quality management. These are stored on a secure server and are available if safeguarding or quality concerns are raised and would be accessed by the DSL (Designated Safeguarding Lead) at Fleet Education Services in the context of a safeguarding investigation, or if not safeguarding, by a senior manager at Fleet Education Services. These recordings are kept for three months.
- When registering on the online tuition platform, tutors and parent/carers give their consent electronically when accepting the Terms and Conditions, to have sessions securely recorded. If consent has not been given, then tutor and student cannot use the platform.

Roles and Responsibilities

The tutor will:

- Ensure that a parent/carer or responsible adult is present during the time of the online lesson if the student is under the age of 18 or a vulnerable adult
- Any computers/laptops/tablets used should be in appropriate and where possible in a neutral area /background where nothing personal or inappropriate can be seen or heard in the background.
- Staff and children must wear suitable clothing, as should anyone else in the household
- Never contact (or respond to) students directly through email, text messages or social media or any other means except through Fleet Education Services online tuition platform
- Report any inappropriate behaviour, illegal activity or inappropriate material in line with Fleet Education Services Safeguarding Policies and Procedures
- Report any safeguarding or child protection concerns in accordance with Fleet Education Services Safeguarding Policies and Procedures

Tutors working on school premises will:

- Familiarise themselves with the school's Safeguarding Policy so that they understand the schools' reporting protocols.
- Report any incident, in the first instance to the school's DSL and then to Fleet Education Services' DSL
- Seek guidance from Fleet Education Services' DSL if unsure how to proceed.
- Be mindful of their surroundings and ensure tuition does not take place in an isolated or secluded area, as an additional person will not be required to remain in the room.
- Ensure that if they are providing group, online tuition for children on school premises, the session will not commence/proceed unless an adult is visible in the classroom.

The school will:

- Ensure tutors providing tuition on their premises will be made familiar with their local Safeguarding Policy so that they understand the reporting protocols.
- Ensure that tuition does not take place in an isolated or secluded area, without providing tutors with adequate means to call for help if necessary (e.g., Provision of 2- way radio).
- Ensure that when group online tuition is being provided remotely, an adult from the school will be in the room, throughout the session. This will support any disruption/illness that cannot be managed by the tutor teaching remotely.

The Learner will

- not start using the service unless their school or a parent/carer/guardian over the age of 18 has formally registered for them.
- Not communicate with the tutor other than through the online tuition platform
- Wear suitable clothing.

The parent/carer/responsible adults will

- Be responsible for the welfare of the learner and ensure suitable clothing is worn to include anyone in the household
- Ensure that any computers/laptops/tablets used should be in an appropriate area, for example, not in bedrooms.
- Be present in the home or location of the learner during online tuition session

The DSL will

- DSLs have overall responsibility for online safety KCSIE Part 5 (Annex D) and to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability in support of keeping children safe whilst online The DSL's online responsibility cannot be delegated but can be supported by appropriately trained deputies and they may liaise with other staff on matters of online safety.
- Recognise and be able to offer support regarding the additional risks learners with (SEND) face online and have the relevant knowledge and up to date capability required to keep children safe online.
- Ensure that online safety is integral to induction and regular safeguarding/child protection training.

- Recognise and ensure staff and tutors are aware of the role technology plays in terms of content relating to Child Sexual Exploitation and Child Criminal Exploitation and that child- on-child sexual violence and sexual harassment can occur on and offline. (see KCSIE 2022 – Part 5)
- Additional information within Annex C is available on how to support the safety of children online, while they are learning at home.

2.0 Acceptable Use

Tutors will:

- Use their own devices to access online learning resources to supplement tuition, unless working at a school which supplies their own devices to tutors
- Encrypt or password protect all devices brought to tuition sessions
- Not access any devices belonging to the learner. If the learner, is required to use their device to download learning resources to supplement lessons, tutors must seek permission from the parent/carer first
- Immediately report to Fleet Education Services’ Designated Safeguarding Lead (DSL) any illegal, inappropriate or harmful material or incident that as soon as aware
- Not take or publish images of the learner or family members with or without their permission. If images are required as part of the learning, permission must be sought from Fleet Education Services prior to asking the learner. Parent/carer or appropriate adult must be present when images are taken
- Tutors will not save any personal contact information regarding any student on their personal devices i.e., laptop. Please keep assessments and learning plans password protected or anonymised.
- Any concerns that a young person being tutoring might be subject to abuse, or any concerns of a child protection nature, whether online or not, must be reported to the DSL
- Tutors/staff having concerns over security of devices must seek advice from DSL

3.0 Dealing with the Sharing of nudes & semi-nudes imagery procedure

This is also known as youth produced/involved sexual imagery or ‘sexting’. It has been defined as ‘the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline. Alternative terms used by children and young people may include ‘dick pics’ or ‘pics’. UKCIS 2020

Motivations are not always sexually or criminally motivated and doesn’t apply to adults sharing nudes or semi-nudes of under 18-year-olds. This is a form of child sexual abuse and must immediately be referred to the police.

Reporting

Report immediately to Designated Safeguarding Lead (DSL) or equivalent as outlined in the policy.

- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal.**
- If you have accidentally already viewed the imagery (e.g., if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.

- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

<https://www.childnet.com/Childnet>

<https://parentzone.org.uk/>

UK Safer Internet Centre

Internet Foundation Watch

Key Safeguarding contacts

Any concerns of a child protection or safeguarding nature should be immediately reported to Fleet Education Services Deputy DSLs or DSL or who can be contacted on:

Designated Safeguarding Lead

Dave Burchett: 07938 600672

Deputy Designated Safeguarding Leads

Linda Chapman: 07946 673351

Edith Wright: 07725 039 586

Managing Director – Fleet Education Services

Mylene Curtis: 07710 455481