2. Online Safety Policy

The purpose and scope of this policy statement

The aim of Tutor Led Learning is to provide outstanding tuition to children aged approximately 10-16 years of age. Tuition may take place on a one to one, one to small group (tutorial) or one to many (webinar) basis. Predominantly tuition is conducted online but could, occasionally, take place face to face.

The purpose of this policy statement is:
- to protect children and young people who receive Tutor Led Learning's services from harm
- to provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection
- ensure the safety and wellbeing of children and young people is paramount when adults, young people or children are using the internet, social media or mobile devices
- provide staff and volunteers with the overarching principles that guide our approach to online safety
- ensure that, as an organisation, we operate in line with our values and within the law in terms of how we use online devices.

This policy applies to anyone working on behalf of Tutor Led Learning, including senior managers, paid staff, volunteers, sessional workers, agency staff and students.

This Online Safety Policy includes sections on:
- A. General principles of online safety
- B. Photography and sharing images guidance
- C. Risk assessment for the use of online cameras

Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. A summary of the key legislation and guidance is available from:
Online abuse
Bullying
Child protection

Supporting documents

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents:

Policy 1: Safeguarding and Child Protection Policy
Policy 2: Online safety policy (this policy)
Policy 3: Complaints policy
Policy 4: Behaviour and discipline policy
Policy 5: Health and safety policy

2A General principles of online safety

We believe that:

- children and young people should never experience abuse of any kind
- children should be able to use the internet for education and personal development, but safeguards need to be in place to ensure they are kept safe at all times

We recognise that:

- the online world provides everyone with many opportunities; however it can also present risks and challenges
- we have a duty to ensure that all children, young people and adults involved in our organisation are protected from potential harm online
- we have a responsibility to help keep children and young people safe online, whether or not they are using Tutor Led Learning's network and devices
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare and in helping young people to be responsible in their approach to online safety
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse.

We will seek to keep children and young people safe by:

- providing clear and specific directions to staff and volunteers on how to behave online through our behaviour code for adults
- supporting and encouraging the young people using our service to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others
- supporting and encouraging parents and carers to do what they can to keep their children safe online
- developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or a child or young person
- reviewing and updating the security of our information systems regularly
- ensuring that user names, logins, email accounts and passwords are used effectively
- ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate
- ensuring that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- providing supervision, support and training for staff and volunteers about online safety
- examining and risk assessing any social media platforms and new technologies before they are used within the organisation.

If online abuse occurs, we will respond to it by:

- having clear and robust safeguarding procedures in place for responding to abuse (including online abuse)
- providing support and training for all staff and volunteers on dealing with all forms of abuse, including bullying or cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation

- making sure our response takes the needs of the person experiencing abuse, any bystanders and our organisation as a whole into account
- reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term.

2B Photography, video and sharing images guidance

The purpose and scope of this policy statement

Tutor Led Learning works with children and families as part of its activities. These include: the delivery of online tuition and occasional face to face tutoring or workshops.

The purpose of this policy statement is to:
- protect children and young people who take part in Tutor Led Learning's services, events and activities, specifically those where photographs and videos may be taken
- set out the overarching principles that guide our approach to photographs/videos being taken of children and young people during our events and activities
- to ensure that we operate in line with our values and within the law when creating, using and sharing images of children and young people.

This policy statement applies to all staff, volunteers and other adults associated with Tutor Led Learning

We recognise that:

- sharing photographs and films of our activities can help us celebrate the successes and achievements of our children and young people, provide a record of our activities and raise awareness of our organisation
- the welfare of the children and young people taking part in our activities is paramount
- children, their parents and carers have a right to decide whether their images are taken and how these may be used, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation
- consent to take images of children is only meaningful when children, their parents and carers understand how the images will be used and stored, and are fully aware of the potential risks associated with the use and distribution of these images
- there are potential risks associated with sharing images of children online.

We will seek to keep children and young people safe by:

- always asking for consent from a child and their parents or carers before taking and using a child's image
- always explaining what images will be used for, how they will be stored and what potential risks are associated with sharing images of children
- making it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published
- changing the names of children whose images are being used in our published material whenever possible (and only using first names if we do need to identify them)
- never publishing personal information about individual children and disguising any identifying information (for example the name of their school or a school uniform with a logo)
- making sure children, their parents and carers understand how images of children will be securely stored and for how long (including how we will control access to the images and their associated information)
- reducing the risk of images being copied and used inappropriately by:
  - only using images of children in appropriate clothing (including safety wear if necessary)

- ○ avoiding full face and body shots of children taking part in activities such as swimming where there may be a heightened risk of images being misused
- ○ using images that positively reflect young people's involvement in the activity.

Photography and/or filming for personal use

When children themselves, parents, carers or spectators are taking photographs or filming at our events and the images are for personal use, we will publish guidance about image sharing in the event programmes and/or announce details of our photography policy before the start of the event. This includes:

- reminding parents, carers and children that they need to give consent for Tutor Led Learning to take and use their images
- asking for photos taken during the event not to be shared on social media or asking people to gain permission from children, their parents and carers before sharing photographs and videos that include them
- recommending that people check the privacy settings of their social media account to understand who else will be able to view any images they share
- reminding children, parents and carers who they can talk to if they have any concerns about images being shared.

2C Risk assessment for the use of online cameras

Hazard	Risk	Mitigation	Risk rating (Low /Med /High
Recording / sharing images / video of children	Images / video could be shared outside of lessons without consent	- Tutorials are not to be recorded by TLL tutors - No screen grabs of students are to be taken by TLL tutors - TLL to disable remote recording of lessons in Zoom - Rules on camera and microphone use to be communicated clearly to parents when purchasing lesson tickets - All tutors and students to wear appropriate clothing during lessons - Background of tutor and student videos to be appropriate eg background to be blurred if in a bedroom - Tutors to never conduct a video lesson or meeting with a student outside of normal lesson time without clear consent in writing from the parent in advance - TLL tutors are to immediately disable student cameras if inappropriate content appears via the student feed, either directly from the student or activity in their background - Parent/carer permission will be sought before photographs are taken at any face to face event and these photographs will not show the faces of the children	Low
Inappropriate screen sharing	Tutor could screen share something inappropriate for their audience	- Close unnecessary browser tabs when teaching - Choose appropriate desktop images - Ensure documents saved on desktop have appropriate file names - Close unnecessary apps and programmes when teaching - Tutors not to allow students to screen share - Disable pop-up notifications eg for emails received	Low
Inappropriate behaviour, comments or material shared by students	Upsetting or harming other students	- Tutor to be present at all times during the lesson and only to leave the meeting in exceptional circumstances in which case all student mics, cameras and chat should be disabled - Students should be asked and reminded not to share links or other material with other students via the chat function - Students engaging in inappropriate behaviour will be asked politely to stop with an explanation, should it continue their camera and mic will be	Low

		disabled by the tutor or if necessary they will be removed from the room and a follow up email will be sent to parent/carer explaining why ● TLL tutors are to maintain appropriate professional boundaries with students at all times ● If inappropriate comments or material is shared by students via the chat function or otherwise then a record of this will be saved to inform decision making by senior members of TLL staff	
GDPR	Risk that data protection laws are breached. Personal and physical security may be compromised.	● Privacy notice is in place and available to parents/carers via TLL website ● Lessons are not recorded	Low
Unintended participants attend lesson	Inappropriate behaviour or sharing of images / other content	● People only admitted to lessons if Zoom name matches that of either the parent or child on the purchased ticket ● Zoom security settings on maximum to reduce risk of uninvited attendees eg all Zoom links to have embedded passwords ● Zoom links to only be made available to parents/carers purchasing tickets and never to made publicly available or distributed for free	Low

Potential Severity of Harm				
	High Death, paralysis, long term serious ill health.	Medium	High	High
	Medium An injury requiring further medical assistance or is a RIDDOR incident.	Low	Medium	High
	Low Minor injuries not resulting in any first aid or absence from work.	Low	Low	Medium
		Low The event is unlikely to happen.	**Medium** It is fairly likely to happen.	**High** It is likely to happen.

Likelihood of Harm Occurring

Risk Rating Definitions		
Low		This is an acceptable level of risk. No further controls are required as the risk rating cannot be reduced any further. However, it is advised that continual monitoring occurs in order to ensure that no changes / deviation of control measures occur.
Medium		It is advised that further controls are implemented to reduce the risk rating to as low a level as possible. If the risk cannot be reduced to lower than a medium, then on site monitoring should occur to ensure that all stipulated controls are being adhered to.
High		This is an unacceptable risk rating. Urgent interim controls should be implemented to reduce the risk so far as is reasonably practicable. If the risk rating cannot be reduced to lower than a **High**, then a documented safe system of work should be implemented to control the activity. It may be necessary to seek further professional advice. Serious considerations should be given to the validity of carrying out the activity at all. Regular monitoring of the activity should occur.

Contact details

Nominated child protection lead
Name: Andrew Milson
Phone/email: andy@tutorledlearning.com

Deputy child protection lead(s)
Name(s): David Martin
Phone/email: David@tutorledlearning.com

NSPCC Helpline 0808 800 5000
We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: ……………19 November 2022……………………….(date)

Signed: …   . Date: 19 November 2022………………………………