



Equal Education Partners Online Safety Policy November 2023

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1. Introduction

Equal Education Partners takes a comprehensive approach to online safety that aims to protect staff, tutors and students in their use of technology. We have established mechanisms to identify, intervene in and escalate any concerns where appropriate, in line with the filtering and monitoring standards set out by the Department for Education (DfE) and Keeping Children Safe in Education (KCSIE) 2023.

2. Policy Objectives

The objective of this Policy is to set out the key principles expected of all staff concerning the use of online technologies. It provides assistance to staff working with children to work safely and responsibly with the internet and other IT and communication technologies. For the purposes of this policy, the term staff is used to describe staff and tutors engaged with employment through Equal Education Partners.

In this policy, Equal Education Partners sets clear expectations of behaviour and codes of practice relating to online learning. This ensures that all members of the Equal Education Partners community are aware that unlawful or unsafe behaviour is unacceptable. Practices set out in this policy must be followed to safeguard and protect children and staff from harm. This policy applies to all Employees of Equal Education Partners (individuals who work - or have applied to work for Equal Education Partners either on a permanent, temporary, or contractual basis), and forms part of any employment or service contract. It also applies to work conducted with partner organisations (such as governments, government organisations, schools, colleges etc.).

Equal Education Partners is committed to ensuring that all individuals, regardless of age, disability, gender, race, marital status, religion or belief, sexual orientation or identity are kept safe while engaging in online activity. This policy ensures that, as an organisation, our online work is reflective of our values and fits within legal frameworks.

Equal Education Partners communicates this policy, and its contents, to staff and partner organisations in several ways. These include listing our policy on our website, sharing with members of staff and regular updates and training relating to online safety for all staff. The online safety policy is referenced within Equal Education Partners Safeguarding policy. There is widespread ownership of the policy and it has been agreed by Equal Education Partners' Senior Management and Designated Safeguarding Leads (DSLs). All amendments to the online safety policy will be disseminated to all members of staff and pupils. This online safety policy will be reviewed annually or when any significant changes occur concerning the technologies in use within Equal Education Partners.

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3. Associated Policies

This Online Safety Policy is part of a broader collection of documents that relate to the importance of safeguarding across Equal Education Partners.

This policy should be read in conjunction with Equal Education Partners’:

- Safeguarding and Prevent Policy.
- Professional Code of Conduct - Tutors

Any concerns or issues raised relating to online safety should follow the safeguarding and child protection processes outlined in the policy.

4. Use of online systems for providing tuition

We understand that the online world provides several opportunities for education development. However, it also presents risks which must be taken into consideration. Equal Education Partners and our staff are alert to issues that include but are not limited to:

- Exposure to inappropriate content
- Hate content
- Grooming (sexual exploitation, radicalisation, etc.)
- Online bullying in all forms
- Social or commercial identity theft, including passwords
- Aggressive behaviours (bullying, cyberbullying, etc.)
- Privacy issues, including disclosure of personal information.
- Sexting
- Lifestyle websites promoting harmful behaviours
- Radicalisation

5. Roles and Responsibilities of staff members

Senior Leadership Team

- Must be adequately trained in off-line and online safeguarding.
- To help maintain a ‘safeguarding’ culture, ensuring that online safety is fully integrated with safeguarding.
- To take responsibility for online safety provision.

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- To take responsibility for data management and information security.
- To be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles.
- To be aware of procedures to be followed in the event of a serious online safety incident.
- To facilitate training and advice for staff.
- Take a leading role in establishing and reviewing Equal Education Partners online safety policy/documents.
- To ensure the Equal Education Partners website contains relevant information regarding online safety.

Designated Safeguarding Leads (DSLs)

The role of the DSL is to take control of any child protection issues or wider safeguarding concerns that may be raised by staff of Equal Education Partners. All of our DSLs have completed relevant DSL training to undertake the role. Their contact information can be found in **Appendix 1**. The DSL's responsibilities include:

- Take day-to-day responsibility for online safety issues.
- Logging all safeguarding concerns and actioning accordingly using the relevant channels.
- Promoting an awareness and commitment to online safety throughout Equal Education Partners.
- Ensuring that all staff are aware of the procedures that need to be followed in the event of an online safety incident.
- Regularly updated online safety issues and legislation, and be aware of the potential for serious child protection concerns.

All staff and tutors

- Must report any suspected safeguarding issues or problems to the DSL.
- To maintain an awareness of current online safety issues and guidance e.g. through CPD.
- To model safe, responsible and professional behaviours in their own use of technology.
- Supervise and guide pupils carefully when engaged in learning activities involving online technology.

- Never conduct a lesson other than through the approved platform using the software and links provided by Equal Education Partners.
- Ensure that where pupils are joining a tutoring session from home (and not from school), that a parent/guardian/responsible adult over 18 is present at the start of the session and within earshot during the lesson. This is in line with our at-home tuition guidance.

Staff training

- As part of the induction process, Equal Education Partners provides all new staff with information and guidance on the Online Safety Policy.
- Ensures that regular training is made available to staff regarding online safety issues.
- Keeps tutors and staff informed of current best practices through the use of CPD update emails/bulletins.

Pupils

- To understand the importance of reporting abuse, misuse or access to inappropriate materials.
- To know what action to take if they or someone they know feels worried or vulnerable when using online technology.
- To understand the importance of adopting safe behaviours and good online safety practices when using digital technologies.

6. Management of Safeguarding Incidents

Equal Education Partners have established mechanisms to identify, intervene in and escalate any safeguarding concerns where appropriate. Equal Education Partners' Policy and Procedures comply with statutory duties, and reflect current guidance and good practice in safeguarding children and adults at risk.

Equal Education Partners take all reasonable steps to ensure online safety. Any suspected online risk or infringement is reported to our DSL and submitted with a copy of our Cause of Concern Form. The DSL/s act as the first point of contact for any incident. A detailed explanation relating to reporting and recording concerns can be found in our Safeguarding and Prevent Policy.

At Equal Education Partners, all staff:

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- All members of the school are encouraged to be vigilant in reporting issues, in the confidence that issues will be dealt with quickly and sensitively, through the correct escalation processes;
- Support is actively sought from other agencies as needed in dealing with online safety issues;
- Monitoring and reporting of online safety incidents takes place and contribute to developments in policy and practice in online safety within the school;
- We will immediately refer any suspected illegal material to the appropriate authorities – Police, Internet Watch Foundation and inform the relevant Local Authority.
- The Police will be contacted if one of our staff or pupils receives online communication that we consider to be in breach of the law.

Staff members are encouraged to follow the process for reporting procedures for safeguarding concerns as per our Safeguarding and Prevent guidance.

Conduct of staff

At Equal Education Partners, all users:

- Understand the significance of misuse or access to inappropriate materials and are aware of the consequences;
- Understand it is essential to reporting abuse, misuse or access to inappropriate materials and know how to do so;
- Understand the importance of adopting good online safety practice when using digital technologies.
- Know to be vigilant in the supervision of children at all times, as far as is reasonable, and uses common-sense strategies in learning resource areas where older pupils have more flexible access;
- When delivering tuition online-at-home, ensure that a parent or guardian is present by requesting this at the beginning of a session.
- Where a parent or guardian is not present, understand that the session should be paused and contact should be made with a member of the Equal Education Partners team.
- Know to take professional, reasonable precautions when working with pupils, previewing websites before use; using age-appropriate (pupil friendly) search engines where more open internet searching is required with younger pupils.

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Monitoring student attendance

Children who are absent from Education

As mentioned in KSCIE 2023, it is a requirement for all staff to be aware of children who are absent from education for prolonged periods and/or repeated occasions. Equal Education Partners ensures that all staff are trained to be aware of common trends in student absence, including poor or irregular attendance and patterns in absence, such as regular days and times.

Equal Education Partners monitors attendance closely and works with our staff to ensure that information is recorded accurately via our virtual systems. In the instance of a student not attending, we contact the school immediately to record the absence with a member of staff. All absences and late arrivals are recorded in lesson reports that are completed via our virtual platform after each session. We work in conjunction with the school and their policies to maintain clear lines of communication. As part of our approach to monitoring attendance, all schools receive weekly and termly attendance logs. If the session is in person, the school would be responsible for monitoring attendance adhering to their own internal policies.

Pupil online safety

As outlined in KCSIE 2023 (para 136) Equal Education Partners recognise the considerable breadth of issues classified within online safety, which have been categorised into the following four areas:

- **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 pressure, 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

Equal Education Partners ensures online safety is a constant running and interrelated theme through the development and implementation of all our services, policies and procedures.

Where tuition is to take place online, Equal Education Partners will ensure:

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- That schools obtain and share parental consent that families have agreed to tutoring prior to tuition commencing (**Appendix 2**).
- Where tuition is to take place online at home, parental consent includes an agreement that an appropriate parent or guardian must be present for the duration of the session.
- Where tuition is to take place online at home, a clear guidance document will be provided to parents/ guardians outlining expectations for online tutoring sessions (**Appendix 3**).
- Guidance document will also include information about contact details for our DSL and how to report any safeguarding or additional concerns.
- At the beginning of a session, tutors will confirm that an appropriate parent or guardian is present.
- All online sessions will be recorded using Lessonspace and stored for 365 days before deletion. These are saved on Lessonspace to be accessed by Equal Education Partners at any time.
- Where a school wishes for pupils to access online tutoring using their own platform, provision should be made for these sessions to be recorded and shared with Equal Education Partners in the event of a safeguarding incident or suspected incident.
- A safeguarding 'spot-check' will be undertaken at a minimum of once per term per tutor by the DSL and recorded internally, detailing any safeguarding concerns raised and any subsequent actions in line with our Safeguarding policy.
- Where recording is not possible, where the school owns the recording and Equal Education Partners are unable to monitor in this way, or in cases where a pupil cannot be recorded (for example a child who is looked after) the school and Equal Education Partners will liaise to ensure that a teacher or teaching assistant supervises the session by joining online. The parent or guardian of this child (or children in this group) should also be made aware of these arrangements.

Social networking

Equal Education Partners staff will ensure that in private use:

- No reference should be made in social media to students/pupils, parents/carers or staff;
- Staff should not be online friends with any pupil/student;
- Staff do not engage in online discussion on personal matters relating to members of the Equal Education Partners community;
- Personal opinions should not be attributed to Equal Education Partners and personal opinions must not compromise the professional role of the staff member, nor bring Equal Education Partners into disrepute;

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- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.

7. Management Technology and Recording

Equal Education Partners Company policy is that all tutoring sessions are recorded as part of our safeguarding and online safety policies. As part of our onboarding process with schools, they are aware of this policy. All tutors/staff also sign a safeguarding declaration for online tuition that mentions they understand tuition recordings are monitored by Equal Education Partners.

Storage of all data within Equal Education Partners and all online data will conform to all relevant data protection requirements:

- Ensures staff read the Equal Education Partners online safety policy;
- When accessing tuition online via our approved platform, all pupils are provided with a link which is shared securely to the main school contact. Secure distribution of these links is the responsibility of the school;
- Where tuition is to take place in groups larger than 1:1, the link will be the same for each student in the group;
- Makes clear that links should only be distributed to the students in their group;
- Requires all users to log off when they have finished working or are leaving the computer unattended;
- Ensures all equipment owned by Equal Education Partners has up to date virus protection;
- Maintains equipment to ensure Health and Safety is followed;
- Has a clear disaster recovery system in place that includes a secure, remote off-site back-up of data.
- Ensure all recordings are safely secured on the online platform that can be accessed immediately to monitor and should any safeguarding concerns arise.

8. Password Policy

Equal Education Partners makes it clear that staff members must always keep their passwords private and must not share these with anyone else under any circumstances. All staff have their own unique access to our various online platforms at Equal Education Partners (TutorCruncher, Lessonspace, Equal Academy via Teachable, etc.). We require staff to use strong passwords and encourage the use of double factor

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authentication where appropriate and possible. If a password or account is compromised or a staff member fears that it might become compromised, Equal Education Partners should be notified immediately.

9. Equal Education Partners Website

The Senior Leadership Team takes overall responsibility to ensure that the website content is accurate and the quality of presentation is maintained.

10. Technical Solutions

We require staff to log-out of systems when leaving their computer. All servers are in lockable locations and managed by DBS-checked staff. Disposal of any equipment will conform to the Waste Electrical and Electronic Equipment Regulations.

11. GDPR and Cyber Essentials Plus

All data collected by Equal is processed within the UK in line with GDPR and the Data Protection Act 2018. Our comprehensive approach to data security can be seen in our achievement of the Cyber Essentials Plus certification.

All online tutoring sessions are recorded for safeguarding and monitoring purposes and are deleted in line with GDPR. All personal learner data will be securely stored on GDPR-compliant platforms for the time stipulated under the protocol – i.e. only as long as needed. Any personal data held will be deleted from all systems when a learner permanently leaves the tuition programme or when the programme contract ends – whichever occurs first.

12. Managing and Supporting our Policy

This is a company-approved policy. Equal Education Partners will coordinate and review its implementation as part of our ongoing review and business administration. It is the responsibility of all employees to ensure they are familiar with this Policy and follow the Procedures and guidelines. We provide all staff with guidance and training on its implementation. In instances where procedures change, policies are updated and amendments shared with internal and external staff and partner organisations (such as governments, government organisations, schools, colleges etc.).

If you wish to contact us regarding our Policy content or implementation, please contact the person below in the first instance:

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Natalie Gondwe

Business & People Manager

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Appendix 1 - Safeguarding contacts and Designated Safeguarding Leads (DSLs)

The role of the DSL is to take control of any child protection issues or wider safeguarding concerns that may be raised by staff of Equal Education Partners. All of our DSLs have completed relevant DSL training to undertake the role.

Any safeguarding issues can be directed to a central email address that is monitored by our DSLs - safeguarding@equaleducationpartners.com

Equal Education Partners' Designated Safeguarding Leads (DSLs) are:

Recruitment: Amy Keen (Candidate Recruitment Manager) - amy.keen@equaleducationpartners.com

Tutoring: Stuart Booker (Project Coordinator Lead) – stuart.booker@equaleducationpartners.com

Appendix 2 - Parental Consent Template Letter for Schools

Online Tuition by Equal Education Partners

Dear Parents & Guardians,

Over the next term, your child will be benefiting from online tuition from a specialised tutor as part of the National Tutoring Programme. This tuition is being provided by an Approved Tuition partner; Equal Education Partners.

<https://equaleducationpartners.com/>

Tuition is part funded by the school and part funded by the Department for Education and is aimed at ensuring that all children are given the opportunity to catch up on any learning that they may have missed during school closures due to Covid 19.

Your child will be accessing online learning with their tutor individually. In order for your child to take part, we ask that a parent or guardian is present in the room during your child's participation. Our tutors will be checking this at the beginning and during the session. We also know that tuition is more effective when students and tutors can see one another so we ask that cameras remain on (unless there is prior agreement with the school).

We have provided a guidance document below for you which provides further details about our expectations for online learning. If you have any further questions, please speak to your child's class teacher or member of staff at the school who is responsible for organising tuition. In order for your child to access their online tuition, please sign and return the following consent form. Without your consent, your child will not be able to access this additional support.

Kind regards,

The Tutoring Team at Equal Education Partners

I give consent for my child to take part in online tuition provided by Equal Education Partners.

- *I will ensure that a parent or guardian will be present during online learning sessions.*
- *I will ensure that my child's camera stays on (unless previously agreed with the school).*
- *I understand that all online sessions are recorded for safeguarding purposes.*
- *I understand that I must not record, screenshot or share any content of these sessions.*

Signed: Date:

Relationship to Child:

Appendix 3- Online Learning Guidance for Parents and Students

Learning Online: Guidance for Parents, Carers and Pupils

This guidance is intended to help you ensure that your child's tuition sessions run smoothly. It also provides further information about our tutors.

All of our tutors:

- Are qualified teachers or graduates with teaching experience;
- Have an up to date DBS check;
- Have received induction and training about online safety and tuition;
- Have completed safeguarding training;
- Are based in the UK.

Some tips to help your child's session run smoothly:

- If possible, please help your child find a quiet place to study, although this should not be their bedroom.
- Please ensure that brothers/ sisters and other family members do not interrupt these sessions.
- Please ensure that a parent or guardian is present (within earshot) during the session; our tutors will not be able to deliver their session to your child if they are alone.
- Please ensure that the camera is on during your child's session.
- Your child's tutor will be supported by their class teacher or subject teacher to plan their sessions and will provide feedback to the school after each session as well. If you would like to add or receive any further feedback, please contact the school directly.

What to do if you have any concerns?

In the first instance, please contact your child's school who will be able to answer any questions you may have about their sessions.

If you have any concerns relating to safeguarding, please contact Stuart Booker (Designated Safeguarding Lead (DSL) at Equal Education Partners.

stuart.booker@equaleducationpartners.com