

# EMPOWERING FUTURES ALTERNATIVE PROVISION

## ONLINE SAFETY POLICY

**Issue Date:** December 2025

**Next Review:** December 2026

**Approved by:** Director, Empowering Futures Alternative Provision

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## 1. POLICY STATEMENT

Empowering Futures Alternative Provision (EFAP) is committed to ensuring that all learners, including children, young people and adults, can engage in online and digital learning safely and responsibly.

This policy ensures:

- Compliance with safeguarding requirements
- Safe delivery of online AP and adult learning
- Protection from online risks, exploitation and harm
- Data protection and cyber security alignment
- Secure use of digital platforms for teaching, assessment and communication
- Industry-standard expectations for online vocational resources

This policy works alongside EFAP's:

- Safeguarding & Child Protection Policy
  - Cyber Security Policy
  - Behaviour Policy
  - Data Protection Policy
  - Health & Safety Policy
  - Staff Code of Conduct
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## 2. LEGAL & REGULATORY FRAMEWORK

This policy is based on:

- Keeping Children Safe in Education (KCSIE) 2024/25
- Working Together to Safeguard Children 2023
- UK GDPR & Data Protection Act 2018
- Prevent Duty Guidance
- Education Act 2011
- CEOP & UK Safer Internet Centre guidance
- Local Authority AP commissioning requirements
- Awarding body expectations (NCFE, Focus Awards, ASDAN)

Online safety is a statutory safeguarding requirement for AP and post-16 provision.

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### 3. SCOPE

This policy applies to:

- All learners (children, young people & adults)
- All staff, tutors, assessors, mentors, contractors and volunteers
- All online, remote and hybrid sessions
- All digital devices used for EFAP teaching and assessment
- All social media or online contact linked to EFAP
- All vocational online resources

It covers:

- Use of video platforms (Zoom, Teams or equivalent)
  - E-portfolio systems
  - Communication channels
  - Digital safeguarding
  - Cyber security
  - Online behaviour expectations
  - Remote assessment safety
  - Online risks including exploitation, bullying, radicalisation and grooming
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### 4. ONLINE SAFETY PRINCIPLES

EFAP ensures that online learning environments are:

- **Safe** – minimise risk and harm
- **Supervised** – monitored appropriately by trained staff
- **Controlled** – only approved platforms are used

- **Private** – personal information protected
  - **Respectful** – behaviour expectations upheld
  - **Inclusive** – accessible for SEND and SEMH learners
  - **Transparent** – communication always professional
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## 5. ROLES & RESPONSIBILITIES

### Director / DSL

- Strategic lead for online safeguarding
- Ensures all online procedures comply with safeguarding law
- Approves digital platforms and communication systems
- Liaises with Police, LAs and CEOP when required

### Deputy DSL / Safeguarding Team

- Respond to online safety concerns
- Record incidents
- Support vulnerable learners
- Review risk assessments for online sessions

### Cyber Security Lead

- Ensures digital systems meet security standards
- Oversees access controls
- Manages breaches and reports
- Works alongside the DSL in data-linked online concerns

### Tutors & Assessors

- Deliver sessions safely
- Ensure cameras and chat functions are used appropriately
- Monitor learner engagement and wellbeing
- Follow escalation procedures for online incidents

### Learners

- Follow EFAP online behaviour rules
- Attend sessions in an appropriate and safe environment
- Report concerns immediately

### Parents/Carers (for under 18s)

- Support safe online environments
  - Monitor learner use of technology
  - Engage with EFAP regarding concerns
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## **6. APPROVED ONLINE PLATFORMS**

EFAP uses only approved systems which comply with:

- Data protection
- Cyber security
- Safeguarding standards
- Awarding body assessment requirements

No staff may use personal accounts or unapproved platforms for teaching or communication.

Platforms include (examples):

- Secure video conferencing (Teams/Zoom Business)
  - Learning management systems
  - E-portfolio platforms
  - Secure email addresses
  - Controlled messaging via EFAP-approved platforms
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## **7. SAFEGUARDING DURING ONLINE SESSIONS**

Tutors must:

- Begin sessions with a safeguarding check-in where appropriate
- Ensure cameras are used professionally
- Maintain appropriate tutor–learner boundaries
- Monitor learner body language, tone and behaviour
- Immediately report concerns to the DSL
- Ensure no private one-to-one chats occur unless safeguarding required
- Keep records of attendance and engagement

Learners must:

- Keep cameras on where required (unless SEND/SEMH plan states otherwise)
- Dress appropriately
- Avoid inappropriate backgrounds

- Not record sessions without permission
  - Speak respectfully to staff and peers
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## **8. ONLINE BEHAVIOUR & CONDUCT**

EFAP applies the same behaviour expectations online as on site.

Prohibited online behaviours include:

- Bullying, harassment or intimidation
- Sharing explicit or harmful content
- Accessing inappropriate websites
- Recording staff or learners without permission
- Sharing session links
- Using offensive language
- Contacting staff outside permitted communication channels

Breaches may result in:

- Removal from session
  - Behaviour plan review
  - Parent/carer/LA involvement
  - DSL intervention
  - Police involvement where necessary
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## **9. RISK ASSESSMENT FOR ONLINE DELIVERY**

EFAP completes risk assessments for:

- SEND and SEMH learners
- Learners with safeguarding flags
- Vocational sessions conducted online
- Practical demonstrations carried out at home
- Lone participation risks for adult learners
- Learners with online exploitation risk history

Risk assessments include:

- Adjusted supervision levels
- Appropriate group sizes

- Camera adjustments
  - Alternative learning arrangements
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## **10. PROTECTING LEARNERS FROM ONLINE RISKS**

EFAP implements controls against:

### **10.1 Online Grooming & Exploitation**

- Staff monitor signs of manipulation
- Session links never shared publicly
- No private messaging with learners

### **10.2 Cyberbullying**

- Reporting procedures integrated into safeguarding
- Sanctions apply as per Behaviour Policy

### **10.3 Exposure to Harmful Content**

- Web filtering on EFAP devices
- Guidance provided to parents/carers for home filtering
- Staff trained to identify and act on exposure incidents

### **10.4 Radicalisation / Extremism**

- Prevent Duty risks monitored
- Concerns escalated through safeguarding channels

### **10.5 Online Addiction & Screen Fatigue**

- Tutors provide breaks for long sessions
  - Adjusted timetables for SEND learners
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## **11. DATA PROTECTION & PRIVACY**

EFAP complies with all elements of:

- Data Protection Policy
- Cyber Security Policy
- GDPR
- Safeguarding

Controls include:

- No sharing of personal contact details between staff and learners
- Secure file transfer systems only
- Encrypted account access
- Logging and monitoring of data access
- No use of personal devices by staff unless authorised
- Mute/disable features for risk management

Recordings may be permitted for:

- Safeguarding evidence
- Quality monitoring
- Teaching purposes

But must be:

- Stored securely
  - Accessed only by authorised staff
  - Deleted according to retention schedules
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## 12. ONLINE SAFETY FOR VOCATIONAL DELIVERY

### Beauty, Nails & Hair (Online Theory or Demonstrations)

Risks include:

- Chemical misuse at home
- Hot tool risks
- Inhalation risks
- Unsupervised practice

EFAP prohibits learners from performing **practical activities involving chemicals or heat tools at home** unless:

- A responsible adult is present (for U18s), and
- A risk assessment supports safe activity

### Sports & Fitness

No physical exercise may be performed unless:

- Learner has completed a PAR-Q
  - Tutor can view the learner clearly
  - The environment is safe
  - Emergency contact details are available
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## 13. SAFE COMMUNICATION

All communication must:

- Use EFAP-approved platforms
- Be logged where safeguarding may be relevant
- Remain professional
- Avoid personal opinions or informal relationships

Staff must never:

- Use personal phones or social media to contact learners
  - Accept learner friend requests
  - Message learners privately unless safeguarding requires intervention
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## 14. INCIDENT MANAGEMENT

Any online safety concern must be:

1. Reported immediately to the DSL
2. Recorded on EFAP's safeguarding system
3. Investigated within the same working day
4. Shared with LA/social worker where required
5. Escalated to Police/CEOP if a crime or exploitation is suspected

Incidents include:

- Grooming attempts
- Cyberbullying
- Exposure to harmful content



- Unexplained learner distress online
  - Breaches of platform security
  - Camera exposure concerns
  - Technical breaches linked to cyber attacks
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## **15. TRAINING & STAFF COMPETENCY**

All EFAP staff receive training in:

- Online safeguarding
- Cyber security and phishing awareness
- Remote learning best practice
- Professional boundaries
- Behaviour management online
- SEND considerations in online environments
- Data protection in digital contexts

Training is refreshed annually.

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## **16. MONITORING & QUALITY ASSURANCE**

EFAP ensures online safety effectiveness through:

- Termly audits
- Spot checks of online sessions
- Feedback from learners & staff
- Incident analysis
- LA and awarding body feedback
- DSL oversight of risk assessments

Outcomes inform improvements.

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## **17. POLICY REVIEW**

This policy will be reviewed:

- Annually
- After any significant online safety incident
- Following changes in legislation or guidance
- After awarding body or LA recommendations
- Following internal quality audits

Approved by:

**Rhean White – Director & Designated Safeguarding Lead**  
Empowering Futures Alternative Provision