

EMPOWERING FUTURES ALTERNATIVE PROVISION

ONLINE SAFETY POLICY

Policy Name	Online Safety
Site	Birmingham
Version	1.0
Approved By	Director / DSL
Date Reviewed & Confirmed	18 January 2026
Next Review Due	January 2027

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

2. LEGAL & REGULATORY FRAMEWORK

This policy is based on:

- Keeping Children Safe in Education (KCSIE) 2025
- 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.

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

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

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

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

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

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

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

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

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

12. ONLINE SAFETY FOR VOCATIONAL

DELIVERY

Delivery of vocational learning through online or remote methods is carefully managed to ensure learner safety and safeguarding.

For Beauty, Nails and Hair, online delivery is restricted to theory-based learning, visual demonstrations and tutor-led instruction only. Learners are **not permitted** to use hot tools, chemicals, professional products or specialist equipment at home. All practical activities involving such items are delivered **on site only**, under direct staff supervision and in line with Health and Safety and risk assessment requirements.

For Creative Media, online delivery focuses on theory, planning and digital production activities. Risks may include unsupervised use of digital equipment, exposure to inappropriate online content and unsafe use of software or platforms. These risks are managed through the use of approved platforms, clear expectations for acceptable use, supervised sessions where possible, and adherence to Empowering Futures' Online Safety and IT policies.

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

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

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.

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.

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