ONLINE SAFETY POLICY

We're committed to ensuring the highest possible standard of safeguarding.

Our child protection policies and procedures have been developed alongside our current Designated Safeguarding Officer, Haydon Moore. This policy should be read as part of the Trinity Learning Safeguarding Policy.

These include the following provisions:

- All tutors must hold a current and active enhanced DBS certificate to join our tutor portfolio.
- Parents are entitled to ask the tutor to verify this at any stage before lessons commence.
- All Online Lessons are recorded and available for playback to parents and students via Zoom recordings.
- Feedback about our tutoring services is reflected via our WeChat account.

We have a link with the <u>Child Exploitation and Online Protection Centre (CEOP)</u>. Visit their website for more internet safety advice.

Children must be safeguarded from potentially harmful and inappropriate material or behaviours online. Trinity Learning will adopt a whole company approach to online safety. It will empower, protect, and educate our students and staff in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Trinity Learning (TL) identifies that the breadth of issues classified within online safety is considerable but can be categorised into four areas of risk:

- **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 (including 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.

Trinity Learning 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.

POLICY

Introduction
Trinity Learning is committed to ensuring the highest possible standard of safeguarding. The personal safety and well-being of each student and tutor using TL are paramount.

Legislative Framework/Related Policies :
These policies and procedures aim to ensure that all persons using the TL services can do so safely within child safeguarding standards and UK law.

Aims
This policy aims to safeguard all students and other persons using the TL system whilst they are in an online lesson.

This policy document contains the responsibilities of all persons using TL, including tutors, students, parents (responsible adults) and administrators.

All persons using or working on behalf of TL must be aware of this policy and have familiarised themselves with the detailed safeguarding procedures.

This policy should be read and understood before engaging in any activity arranged through TL, and the responsibilities and procedures therein should be adhered to. Contravention of the policy document could lead to suspension, dismissal and/or barring from the services and may lead to police involvement.

General Information

Registration of Tutors :

- Trinity Learning will only accept the registration of tutors with an enhanced DBS certificate to join our tutoring services.
- Trinity Learning only accepts tutors with DBS certificates and can show this information. All contractual staff will be subject to a DBS as part of their contract. Parents are also entitled to ask the tutor to verify this at any stage before lessons commence.
- All tutors need to show identification before commencing work and show that they are eligible to work in the U.K
- All tutors will have a formal interview conducted by Haydon Moore, who is also the Designated Safeguarding Officer (DSO). All interviews will be recorded.

@trinitylearning.co.uk is the company's email address; all communication with the tutors will go via this email address. Any setting of work should be sent to Nicole, who will forward it to the parent's email address.

Trinity Learning will only transfer payments to tutors with verified personal bank accounts.

Trinity Learning encourages students and parents to provide feedback about the tutors. This enables us to improve our services and give prospective students and parents the best possible experience.

Privacy

The contents of all communications between tutors, parents and students will go via the company WeChat channel or Trinity Learning's email to preserve the student's anonymity from the tutor.

Any tutor employed by TL will not be aware of the email address of the individual student and will not be able to communicate with them directly. The tutor will not initiate first email contact with parents or students.

All email communication between tutor and parent will be copied to Haydon Moore, Linda Quinn and Nicole.

All personal details about the student and parents, including contact address and phone number, will remain private and confidential and will not be available to the tutor.
All data held by Trinity Learning is in accordance with the Data Protection Act 1998.

Recording of sessions

- All Online Lessons will be recorded and are available for playback (via Zoom) to the parents and students.
- Trinity Learning may review any sessions where a report has been made by any person using Trinity Learning for the purpose of investigating the report.
- Trinity Learning will allow access to UK law enforcement of any recording where it is reported a criminal offence may have occurred concerning a specific session.

Roles and Responsibilities of persons using Trinity Learning

The Tutor

Any tutors shall:

- Ensure that their environment does not display any inappropriate images or documentation capable of being viewed by the student or parent when conducting a session.
- Treat students fairly and without prejudice or discrimination; students who have a disability or come from a minority ethnic or cultural group can easily become victims of discrimination and prejudice which may be harmful to the student's well-being.
- Always ensure language is appropriate and not offensive or discriminatory.
- Ensure any contact with the student is appropriate to their role as a tutor and confined to the relevant Online Lesson session.
- Not make any improper suggestions to a student.
- Not send unsolicited communications to the student or parent.
- Value and take students' contributions seriously and ensure that students value and respect each other's contributions.
- Report any dispute with a student or parent/responsible adult to Trinity Learning, in accordance with the Safeguarding Policy.

- Report any inappropriate behaviour or illegal activity identified within an Online Lesson session by the student or third party, in accordance with procedures set out in Safeguarding Policy.
- Ensure that if no parent is present during an Online Lesson session that the student is comfortable to continue the session; if not, they can terminate the session.
- Be aware that the sessions are recorded, and they are available for review by a student or parent for the duration of booked lessons.
- Tutors must be aware of sensitive issues specific to the countries we teach in. Conversations about politics, religion, human rights and historical events must be handled sensitively. If in doubt, please speak to Haydon Moore and Linda Quinn.

The Student

No students under the age of 18 can book lessons directly with Trinity Learning. All lessons are booked by an appropriate adult.

The student shall:

- Treat the tutor with respect and fairness, and not subject them to abusive behaviour or language.
- Value and respect the contributions of other students.
- Not make any improper suggestions to the tutor.
- Have no inappropriate communication with the tutor outside the online lesson session.

PROCEDURES

Introduction

Trinity Learning (TL) is committed to ensuring the highest possible standard of safeguarding. The personal safety and well-being of each student and tutor using TL is paramount.

The following sections set out the procedures that should be followed if an incident occurs.

The safety and well-being of any student or other person using TL is paramount. These procedures aim to ensure a prompt response to any incident and to minimise any further harm to a student or other person.

There are differing severities of behaviour which could be witnessed during an online lesson. Some behaviour would warrant only a report to TL; other behaviour maybe of a more serious nature where a direct report to the police may be necessary.

Each section below sets out the recommended procedure which should be followed. It is always the responsibility of the person alerted to the incident to take some action to protect the student or other person.

The procedures are not an exhaustive list; therefore if an incident occurs that is not covered in this document you are advised to contact the DSO, or the police if you believe that it may be a criminal matter.

TUTORS

If a tutor sees/experiences:

Inappropriate language

The tutor will request, in a polite manner, that the student or other persons using inappropriate language refrains from doing so during the Online Lesson session. If the language continues the tutor will explain that they will terminate the session due to the language and will report the matter to TL who will decide on any further use of the service by the student or other person involved. The tutor will have no further contact with the student unless by mutual agreement with TL. Any unsolicited contact from the student or other persons following the termination of the session should be reported to the DSO.

Inappropriate behaviour

The tutor will request, in a polite manner, that the student or other persons involved in the inappropriate behaviour refrains from the behaviour during the Online Lesson session. If the behaviour continues the tutor will explain that they will terminate the session due to the behaviour and will report the matter to Haydon Moore or Linda Quinn who will decide on any further use of the service by the student or other person involved. The tutor should have no further contact with the student unless by mutual agreement with TL. Any unsolicited contact from the student or other persons following the termination of the session should be reported to TL.

Inappropriate or abusive images

Any display of adult pornographic images whilst in the presence of a student may constitute an offence under UK law. Any tutor witnessing the display of adult pornographic images by or towards a student should explain that the images should not be displayed during an Online Lesson session, terminate the session and report the matter to the DSO.

Any display of child abuse images or indecent images of a child (for these purposes, a 'child' is defined as anyone under the age of 18 years) is an offence under UK law. Any tutor witnessing a display of indecent images of a child by or in the presence of a student should explain that due to the nature of the images they will terminate the session. The tutor should then inform the DSO. If you think that a child is in immediate danger you should call the police on 999. The tutor should must inform TL of the incident to ensure any recordings can be preserved and made available for any police investigation. The tutor should have no further contact with the student, or any other person involved in the incident. Any unsolicited contact from the student or other persons following the termination of the session should be reported to the police and the DSO immediately.

This action should be taken so that the correct authorities can be alerted and can deal appropriately with the incident.

The display of any other images perceived to be inappropriate, either due to the age of the student or the content of the image shall be reported to the DSO.

Disclosure of/witness to abuse towards or in the presence of a student

Any physical or sexual abuse of a child is an offence under UK law. If a tutor receives information about such abuse from the student or other person present they should reassure the person that they can get assistance for them and follow the procedures under the Safeguarding policy. If you think that a child is in immediate danger you should call the police on 999.

If the tutor witnesses any such abuse at first-hand they should immediately contact the police and report the incident. The tutor should also inform the DSO of the incident to ensure any recordings can be preserved and made available for any police investigation. The tutor should have no further contact with the student or other person involved in the incident. Any unsolicited contact from the student or other

persons following the termination of the session should be reported to the police and the DSO immediately.

Disclosure of inappropriate/sensitive information

During an Online Lesson session sensitive information may be offered by a student or other person present. If the information relates to any kind of abuse the tutor should refer to 'Disclosure of/witness to abuse towards or in the presence of a student', above. The student or other person present should be discouraged from disclosing sensitive information by the tutor. If the information continues to be shared and is deemed to be low level, the tutor will determine the impact of the information and decide whether to continue or terminate the session and report the incident to TL. Tutors should speak to the DSO if they are unsure what to do.

If you think that a child is in immediate danger you should call the police on 999

STUDENTS

If a student sees/experiences:

Inappropriate language

The student will inform a parent/responsible adult of the tutor using inappropriate language. The parent/responsible adult should ask the tutor to refrain from using inappropriate language during the Online Lesson. If the language continues the parent/responsible adult should explain that they will terminate the session and will report the matter to TL, who will decide on any further use of the service by the tutor. The student and parent/responsible adult should have no further contact with the tutor unless by mutual agreement with TL. Any unsolicited contact from the tutor after termination of the session should be reported to TL.

If a parent/responsible adult are not present or readily available, the student should report the language as soon as possible to a parent/responsible adult who will take the decision to report the incident under the complaints procedure.

Inappropriate behaviour

The student will inform a parent/responsible adult of the tutor using inappropriate behaviour. The parent/responsible adult should ask the tutor to refrain from using inappropriate behaviour during the Online Lesson session. If the behaviour continues the parent/responsible adult will explain that they will terminate the session due to the behaviour and will report the matter to TL who will decide on any further use of the service by the tutor. The student, parent/responsible adult should have no further contact with the tutor unless by mutual agreement with TL. Any unsolicited contact from the tutor after termination of the session should be reported to TL.

If a parent/responsible adult are not present or readily available the student should report the behaviour as soon as possible to a parent/responsible adult who will take a decision to report the incident.

If the behaviour is of a sexual nature towards a student by a tutor, the student should immediately inform a parent/responsible adult and terminate the session. The parent/responsible adult should inform the UK police and the DSO immediately.

Inappropriate or Abusive images

Any display of adult pornographic images whilst in the presence of a student may constitute an offence under UK law. Any student witnessing the display of adult pornographic images by a tutor should immediately terminate the session and report this to a parent/responsible adult who should inform the UK police and the DSO.

Any display of child abuse images or indecent images of a child (for these purposes, a 'child' is defined as anyone under the age of 18 years) is an offence under UK law. Any student witnessing a display of indecent images of a child should immediately terminate the session and report this to a parent/responsible adult, who should inform the UK police.

The parent/responsible adult should also inform TL of the incident to ensure that any recordings can be preserved and made available for any police investigation. The student, parent/responsible adult should have no further contact with the tutor involved in the incident. Any unsolicited contact from the tutor following the discontinuation of the session should be reported to the police and the DSO immediately.

This action should be taken so that the correct authorities can be alerted and can deal appropriately with the incident.

The display of any other images perceived to be inappropriate either due to age of the student or content of the image shall be reported to TL.

Disclosure of/witness to abuse

Any physical or sexual abuse of a person is an offence under UK law. If a student receives information about such abuse from the tutor or other person present they should immediately inform a parent/responsible adult. It is the responsibility of the parent/responsible adult to contact the UK police and report what was witnessed.

If the student witnesses any such abuse at first-hand they should immediately contact a parent/responsible adult who should immediately inform the UK police. The parent/responsible adult should also inform TL of the incident to ensure that any recordings can be preserved and made available for any police investigation. The student, parent/responsible adult should have no further contact with the tutor involved in the incident. Any unsolicited contact from the tutor following the termination of the session should be reported to the parent/responsible adult immediately.

This action should be taken so the correct authorities can be alerted and can deal appropriately with the incident.

Disclosure of inappropriate/sensitive information

During an Online Lesson session sensitive information may be offered by a tutor (If the information relates to any kind of abuse the student should refer to 'Disclosure of/witness to abuse'). The tutor should be discouraged from disclosing sensitive information by the student, parent/responsible adult. The parent/responsible adult will determine the impact of the information and decide whether to continue or terminate the session and report the incident to TL

Any information disclosed regarding the safety of a child should always be immediately reported to the UK police and the DSO.

Any tutor reported by a parent/responsible adult will be suspended from the site until the incident has been investigated by the appropriate authority. The parent/responsible adult may be informed of the resolution if appropriate.

Parents/Responsible Adults

As per the policy document, the parent/responsible adult has primary responsibility for the welfare and safety of the student during an Online Lesson session and should be present or available to deal with any concerns or incidents reported by the student.

It is also the duty of the parent/responsible adult to ensure the wellbeing of the child if they have been affected by anything said or done by the tutor.

If a parent/responsible adult is alerted by the student to any inappropriate behaviour/language or information by the student or they witness any inappropriate behaviour/language or information by the tutor, they should immediately speak to the tutor, state their concern and inform them they are terminating the session. The incident should then be reported to TL to take appropriate action. As there is a recording of the session available, the parent/responsible adult may review the session before taking further action.

The parent/responsible adult should have no further contact with the tutor involved in the incident. Any unsolicited communication from the tutor should be reported to the police and TL as soon as possible.

If a parent/responsible adult is alerted by the student to any inappropriate or abusive images or they witness any inappropriate or abusive images displayed by the tutor, they should immediately speak to the tutor, state their concern and inform them they are terminating the session. The parent/responsible adult should inform the UK police (if appropriate) and (in all cases) TL of the incident to ensure that any recordings can be preserved and made available to any police investigation.

The parent/responsible adult should have no further contact with the tutor involved in the incident. Any unsolicited communication from the tutor should be reported to the police and TL as soon as possible.

As there is a recording of the session available, the parent/responsible adult may review the session before taking further action.

Any tutor reported by a parent/responsible adult will be suspended from the site until the incident has been investigated by the appropriate authority. The parent/responsible adult will be informed of the resolution if appropriate.

Director/Management Trinity Learning

The Safeguarding Policy forms the basis of our child protection commitment and this online policy makes up a specific part relevent to our online tutoring. All staff are required to have read the Safeguarding Policy and understood the procedures in place.

If we have any concerns regarding inappropriate behavior we will seek the advice of the Local Authority Designated Officer (LADO) through Single Point of Advice (SPoA). If we suspect that a criminal act has been comitted we will contact the police immediatly.

OTHER POTENTIAL SAFEGUARDING ISSUES

Disclosure of radicalisation/terrorism

Trinity Learning recognises that children are vulnerable to extremist ideology and radicalisation. TL is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from being drawn into terrorism", also known as the Prevent duty and the specific obligations placed upon us as an education provider. If you suspect that a child is becoming radicalised, you should speak to the DSO or contact Channel. Referrals to Channel can come from anyone concerned about individuals who may be vulnerable to being drawn into terrorism. Referrals are most likely to come from youth teams, social services, health, the Police, and educational establishments such as schools.

> **Dedicated helpline: 020 7340 7264**
>
> **Email: counter.extremism@education.gsi.gov.uk**

If you have any child safeguarding concerns including radicalisation you should contact the DSO, Children's Services and/or the **NSPCC**.

In the event of an immediate risk you should contact the police.

So-called Honour Based Abuse (HBA)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

All forms of HBA are abuse, regardless of the motivation. Tutors will report any concerns about HBA to the DSO. If there is an immediate threat, the police will be contacted.

Children who identify as LGBTQ+

The fact that a child or a young person may be **LGBTQ+** is not in itself an inherent risk factor for harm; however, Trinity Learning recognises that children who are **LGBTQ+** or are perceived by other children to be **LGBTQ+** (whether they are or not) can be targeted by other children or others within the wider community.

Trinity Learning recognises risks can be compounded when children who are **LGBTQ+** lack a trusted adult with whom they can be open.

Tutors must be aware that students from certain countries may be less supported than students currently in the U.K.

Appendix 1: CATEGORIES OF ABUSE

All tutors should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation,

kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs that MAY INDICATE Sexual Abuse
- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults, for example, anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Signs that MAY INDICATE physical abuse
- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.

- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse
- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that MAY INDICATE neglect:
- Constant hunger

- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Further information for Online Safety
- NCA-CEOP: www.ceop.police.uk and www.thinkuknow.co.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: https://reportharmfulcontent.com
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices: https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Signed:

Haydon Moore
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