

Online safety Policy

In this Policy, Avado means Avado Group and its subsidiaries, namely Avado Learning Limited, Avado Apprenticeships Limited, and FastFutures Limited.

Online safety is an integral part of safeguarding. Any issues and concerns with online safety must follow Avado's Safeguarding procedures. Refer to the Avado Safeguarding Policy for full details.

When is it reviewed?

This policy is a live document, subject an annual review in line with the Safeguarding Policy review, however, may be amended where necessary during the year in response to developments or updates by our regulators.

Who is responsible for online safety?

Avado's Designated Safeguarding Lead (DSL) takes lead responsibility for safeguarding and child protection (including online safety). The ultimate responsibility sits with the CEO. All parties of the Executive team, Learning Delivery Director, Quality Director and the Designated Safeguarding Lead (DSL) can make amendments at any time.

What are the main online safety risks today?

Online-safety risks are traditionally categorised as one of the 3 Cs: **Content**, **Contact** or **Conduct**.

These three areas remain a helpful way to understand the risks and potential response, whether technological or educational. They do not stand in isolation, however, and it is important to understand the interplay between all three. For many years, online-safety messages have focussed on 'stranger danger', i.e., meeting strangers online and then meeting them face to face (contact) or online fraud (it ranges from viruses or online theft of personal and or financial information). Whilst these dangers have not gone away and remain important, violent, or sexual content is now prevalent – sending or receiving, voluntarily or coerced.

Examples of this are sexting, the sharing of violent and sexual videos, self-harm materials, coerced nudity via live streaming, Cyber Bullying, peer-on-peer sexual exploitation, criminal exploitation, and radicalisation.

How will this policy be communicated?

This policy can only impact upon practice if it is a live document. It must be accessible to and understood by all stakeholders. It will be communicated in the following ways:

- Posted on the company's website
- Available on the internal SharePoint boards
- Available on all platforms including, Avado Learning Platform (ALP), Avado Hub, BUD apprenticeship management information system.
- Part of the induction pack for all new staff (including temporary staff)
- Part of the induction pack for all new learners and employers

- Integral to safeguarding updates and training for all staff
- Shared via internal communications.

Avado aims to:

- Have processes in place to ensure the online safety of learners and staff.
- Deliver an effective approach to online safety, which empowers us to protect and raise awareness for our learners.
- Set out expectations for all Arch staff and learners' online behaviour, attitudes and activities and use of digital technology.
- Help all stakeholders to recognise that online/digital behaviour standards (including social media activity) regardless of device or platform are monitored.

Establish clear structures by which online abuse will be treated, and procedures to follow where there are doubts or concerns.

Key Responsibilities:**Executive Team**

The Executive Team have the overall responsibility for monitoring this policy and holding the CEO to account for its implementation. They will also co-ordinate regular meetings with appropriate staff to discuss online safety to ensure that all members of staff understand the importance of raising awareness. Any cases reported to the DSL will be logged following the same process as Safeguarding and reported monthly to the Executive team.

Other areas of the business also have a responsibility to ensure that online safety is monitored and reported correctly.

Designated Safeguarding Lead (DSL)

The DSL will be responsible for the following:

Understand and make all staff aware of procedures to be followed in the event of an online safeguarding incident.

Ensure that policies and procedures are followed by all staff and learners.

Be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles.

Supporting the CEO in ensuring that staff understand this policy and that it is being implemented consistently throughout.

Working with the CEO, ICT manager and other staff, as necessary, to address any online safety issues or incidents.

Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the Safeguarding Policy.

Liaising with other agencies and/or external services if necessary.

Take lead responsibility for safeguarding (including online safety).

Take day to day responsibility for online safety issues and be aware of the potential for serious concerns.

Receive regular updates on online safety issues and legislation, be aware of local trends.

Ensure that online safety is embedded across the curriculum and beyond.

Promote an awareness and commitment to online safety.

Review and update this policy, other online safety documents (e.g., Acceptable Use Policies) and the strategy on which they are based (in harmony with policies for safeguarding, Prevent and others).

Delivery

The delivery teams are responsible for the following:

Adopt a culture of safeguarding where online safety is fully integrated into the safeguarding policy and delivery.

Undertake training on safeguarding, in accordance with statutory guidance and relevant local guidance to include online safety.

Liaise with the designated safeguarding leads on all online-safety issues which might arise and receive regular updates on issues and broader policy and practice information.

Ensure "An effective approach to online safety [that] empowers us to protect and educate all learners in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate."

Technology

The technology team are responsible for the following:

Take overall responsibility for data management and information security, ensuring that Arch's provision follows best practice in information handling data-protection processes and support careful and legal sharing of information.

Ensure Arch implements and makes effective use of appropriate ICT systems and services including safe filtering and monitoring, protected email systems and that all technology including cloud systems are implemented according.

Ensuring that any online safety incidents are logged and dealt with appropriately in line with this policy and the Safeguarding procedures.

How to report online safety concerns

In line with our safeguarding policy, all staff, learners, and employers are to report any concern to their Designated Safeguarding Lead (DSL). Refer to the Safeguarding Policy for full details.

Learners /Employers:

- 1) Email safeguarding@Avadolearning.com
- 2) Call our dedicated Safeguarding phone number: 0203 911 3420

Employees:

- 1) Email safeguarding@Avadolearning.com
- 2) Call our dedicated Safeguarding phone number: 0203 911 3420
- 3) Complete our online Microsoft Form found [HERE](#)

Additional resources:

National online safety - <https://nationalonlinesafety.com/wakeupwednesday/what-is-online-safety>

Safer Internet - <https://www.saferinternet.org.uk/>

1 Document Control

DOCUMENT NAME	VERSION	MASTER COPY LOCATION
Avado Online Safety Policy	V1.2	Avado compliance SharePoint

Unless stated within the body of this document, the owner is responsible for maintaining document control and facilitating compliance; as well as the management of review, updates and changes.

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2 Revision History

Version	Date	Amended By	Summary of changes
V1	22/09/2021	Keith Harvey	Minor update to first two paragraphs to include link to safeguarding and expand DSL meaning to ensure anyone reading the policy knows what this stands for.
V1.2	06/02/2023	Keith Harvey	Update to remove the Arch brand replace with FastFutures and suitable reference to the Avado group.

3 Document Reviews

This document has been reviewed for QC purposes by the following, in addition to those on the 'approvers' list.

Version	Date	Name	Title / Role
V1	22/09/2021	Keith Harvey	Head of Group Compliance
V2	06/02/2023	Louise Atherton	Designated Safeguard Lead
V2	06/02/2023	Annemarie Schofield	Director of Quality and Contracts

4 Approvals

This document requires the following approvals for implementation and / or for any change in content.

Version	Date	Name	Title / Role	Approval Status (Pending/Approved)
2	2023-6-7	Jasper Joyce	CEO	Approved