



ONLINE SAFETY POLICY

Ember Learning Ltd

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1. POLICY STATEMENT

Ember Learning Ltd, is committed to the online safety of every student who participates in our sessions. Our entire model of delivery is online: students and mentees of all ages served by the Company attend live small group teaching and mentoring sessions via an approved virtual classroom platform. This means that online safety is not a peripheral concern — it is central to every safeguarding decision we make.

This Policy sets out how we create and maintain a safe, positive, and professional online environment. It applies to all sessions delivered via the approved session platform, all associated communications, and all related digital activity. It must be read alongside the Child Protection and Safeguarding Policy (EL-CPSP-001).

This Policy is informed by:

Keeping Children Safe in Education (DfE, 2026) — Annex C (Online Safety)

The Online Safety Act 2023

Searching, Screening and Confiscation guidance (DfE, 2022) — applied as relevant to online contexts

UK Council for Internet Safety (UKCIS) guidance

Working Together to Safeguard Children (HM Government, 2023)

The Care Act 2014 (adult safeguarding — applies to online safety obligations where individuals served are aged 18 or over)

2. SCOPE

2.1 This Policy applies to:

All teachers and mentors delivering sessions via the platform

All Company directors and staff with access to the platform or to student data

Students and Mentees participating in sessions (and, by extension, their parents, carers, or the Mentees themselves where aged 18 or over, via information shared by the commissioning body, whether a Local Authority, Multi-Academy Trust, private company or school)

2.2 This Policy covers all activity on the approved session platform during sessions, including: video and audio interaction, the in-session chat function, virtual whiteboard use, and any screen-sharing or file-sharing features.

2.3 This Policy also covers any communications between teachers or mentors and students or mentees that might occur outside the platform — which are strictly prohibited under this Policy and the Teacher and Mentor Agreement.

3. THE SESSION PLATFORM — SAFEGUARDING FEATURES AND CONTROLS

3.1 Sessions are delivered using an approved virtual classroom platform selected by the Company. The platform provides the following features which are relevant to online safety:

Session recording — all sessions are recorded automatically. Recordings are retained for safeguarding purposes only. Details of how recordings are stored, accessed, and deleted are set out in the Session Recording Policy (EL-SRP-002) and the Data Processing Agreement (EL-DPA-001). No other use of recordings is permitted

In-session safeguarding concern reporting — teachers and mentors log safeguarding concerns via the Ember Learning safeguarding reporting function, accessible within the Platform.

Teachers will be provided with clear guidance on how to access the reporting function as part of their onboarding and whenever the Platform interface changes. Concerns must be logged within one hour of the session ending, in accordance with the Child Protection and Safeguarding Policy (EL-CPSP-001)

Host controls — the teacher or mentor, as session host, controls who can speak, share video, use chat, freeze or close the chat, or end the session, during the session

Access controls — Students and Mentees access sessions via a unique link issued by the Company. Links shall not be shared beyond the intended Student or Mentee

3.2 Ember Learning expects the approved session platform to be used only for its intended educational purpose. teachers and mentors shall not configure the platform in ways that circumvent the safeguarding features described above.

The approved session platform is configured at the administrator level to control participant permissions. Session chat logs are retained as part of the session recording. Students access sessions via unique session links and do not have the ability to contact other participants outside of sessions through the platform. Student-to-student messaging is not supported on the platform and will not be enabled. A Data Processing Agreement with the platform provider must be in place before first session delivery, confirming data residency, encryption standards, and breach notification arrangements.

4. RESPONSIBILITIES OF TEACHERS / MENTORS

4.1 BEFORE THE SESSION. Teachers and mentors must:

Deliver sessions from a professional, appropriate setting with a neutral background free from distractions, personal items, and third parties

Ensure that their own device is secure, updated, and free from malware

Not share session access links with any third party

Not record the session independently by any means — the platform records automatically and independently

4.2 DURING THE SESSION. Teachers and mentors must:

Keep the session on topic and maintain professional conduct at all times

Monitor the session chat actively and address any inappropriate content immediately

Not show students any content — shared screen, documents, or videos — that has not been reviewed for appropriateness in advance

Not engage in private one-to-one messaging with individual Students or Mentees via the in-session chat

Not invite or admit any uninvited or unknown participant to the session

Remain alert to signs of online harm, exploitation, or inappropriate conduct affecting Students or Mentees during the session (including concerning content visible in a student's background environment)

Immediately use the host controls to mute, freeze the chat, or end the session where a participant's conduct poses a risk to others

4.3 AFTER THE SESSION. Teachers and mentors must:

Log any safeguarding concern (including concerns about online safety) via the Ember Learning safeguarding reporting function within the Platform and notify the DSL directly by telephone, in accordance with the Child Protection and Safeguarding Policy

Not retain, download, copy, or share any element of the session recording

Not contact any Student or Mentee outside the platform by any means

5. RESPONSIBILITIES OF THE COMPANY

5.1 Ember Learning will:

Ensure that all teachers and mentors complete online safety awareness training as part of mandatory pre-commencement training before delivering any session

Ensure that the DSL maintains up-to-date knowledge of online safety risks relevant to all ages served by the Company, including cyberbullying, grooming, CSE facilitated online, radicalisation via online channels, and the specific risks of live video communication

Ensure that the approved session platform is configured with appropriate access controls and session settings before any Student or Mentee participates

Maintain session recordings for safeguarding purposes and ensure they are accessible only to the DSL and Deputy DSL

Provide Commissioners with information about the platform and the Company's online safety arrangements to support parental and mentee communication

Review this Policy annually and following any online safety incident

6. RESPONSIBILITIES OF COMMISSIONERS

6.1 Commissioning bodies (Local Authorities, Multi-Academy Trusts, private companies and schools commissioning directly) are responsible for:

Ensuring that parents and carers are informed (or, for Mentees aged 18 or over, that the Mentee themselves is informed) that sessions are delivered online via a live video platform and that sessions are recorded for safeguarding purposes

Obtaining appropriate parental/carers consent for online participation and for session recording, prior to referring any Student. For Mentees aged 18 or over, consent is obtained from the Mentee directly via the Student Consent and Welcome Form

Ensuring that referred Students and Mentees understand the expectations for their conduct during sessions

Ensuring that Students and Mentees have access to an appropriate device and a private, safe space from which to attend sessions

Notifying Ember Learning promptly if they become aware of any online safety concern relating to a referred Student or Mentee

Communicating the Ember Learning responsible adult recommendation to parents and carers before a student's first session: for students under 12, a responsible adult should be present in the same room or immediately available during sessions; for students aged 12 and over, a parent or carer should be reachable and in the locality during sessions. Where no adult is present or reachable, the Commissioner should notify the Ember Learning DSL in advance. Ember Learning will provide Commissioners with clear written guidance to share with parents and carers

7. STUDENT CONDUCT DURING SESSIONS

7.1 Students and Mentees are expected to participate in sessions in a respectful and appropriate manner. The following conduct standards apply:

Students must log in using their own individual access credentials and must not share session links

Students must not record any element of the session by any means

Students and Mentees must treat the teacher or mentor and other session participants with respect

Students must not use the session chat or other platform features to share inappropriate, offensive, or harmful content

Students and Mentees must not attempt to contact the teacher, mentor, or other participants outside of the session environment

7.2 The teacher or mentor is authorised to use host controls to mute, warn, freeze chat, or end a session early if a Student's or Mentee's conduct is disruptive, inappropriate, or poses a risk to others. Where a session is ended early for this reason, the teacher or mentor must notify the DSL and the Commissioner immediately.

7.3 Conduct standards should be communicated to students as part of their onboarding by the Commissioner prior to their first session. The Company will provide Commissioners with relevant information to support this.

8. SPECIFIC ONLINE RISKS IN THE EMBER LEARNING CONTEXT

8.1 Grooming and Inappropriate Contact

The live video format and ongoing relationship between a teacher or mentor and a small group of Students or Mentees over time creates a potential vector for grooming behaviour. All associates are trained to maintain professional boundaries and are prohibited from any contact with Students or Mentees outside the platform. Any contact attempted outside the platform — by the associate or by a Student or Mentee — must be reported to the DSL immediately.

8.2 Online CSE and Exploitation

Associates should be alert to indicators that a Student or Mentee may be experiencing online sexual exploitation or coercion. This may include: a student appearing fearful or distressed in relation to online activity; references to unknown adults making contact online; or inappropriate content visible in the background during a session. Any such concern must be reported to the DSL immediately via the Ember Learning safeguarding reporting function within the Platform and by direct telephone contact.

8.3 Cyberbullying and Peer Harm

In a small group session format, associates may observe peer-to-peer interactions that cause concern (noting that unsupervised student-to-student and mentee-to-mentee messaging is not permitted on the platform). Any bullying, intimidation, or harmful communication observed during a session — whether in video, audio, or chat — must be reported to the DSL and to the referring Commissioner.

8.4 Radicalisation via Online Channels

Associates should be alert to extremist language or references to radicalising content during sessions. Any Prevent-related concern should be reported to the DSL in the same way as any other safeguarding concern.

8.5 Harmful or Illegal Content

If a student shares, displays, or references harmful or illegal content during a session (including child sexual abuse material, extremist content, or content depicting serious harm), the associate should: use host controls to mute the student immediately; end the session if necessary to prevent further harm; and report to the DSL without delay.

8.6 Student Mental Health and Online Harm

Associates should be alert to Students or Mentees who appear to be engaging with self-harm content, pro-eating disorder communities, or suicidal ideation online. Any such concern should be reported to the DSL immediately, who will notify the Commissioner's DSL.

8.7 Online Financial Exploitation

Associates should be alert to indicators that a Mentee aged 18 or over may be experiencing financial exploitation facilitated online, including unexplained requests for money or banking details from online contacts, references to gifts or payments to someone met online, or sudden financial hardship discussed during a session. Any such concern must be reported to the DSL immediately.

8.8 AI-Generated and Digitally Altered Imagery (Deepfakes)

Associates should be alert to the creation, sharing, or discussion of AI-generated or digitally altered images or videos of a Student or Mentee, including so-called 'deepfakes' and AI-generated nudes or semi-nudes. This is a safeguarding concern regardless of whether the image is real, and applies whether encountered via screen-sharing, session chat, background content, or reported by a Student or Mentee outside a session. Any such concern must be reported to the DSL immediately.

9. DATA PROTECTION AND PRIVACY IN THE ONLINE ENVIRONMENT

9.1 All personal data relating to Students and Mentees processed via the platform is governed by the Data Processing Agreement (EL-DPA-001), which sets out the full details of data flows, sub-processors, data residency, and the respective responsibilities of the Controller and Processor. For any queries about how student data is processed or stored, refer to EL-DPA-001.

9.2 Session recordings are retained exclusively for safeguarding purposes. Full details of retention periods, access controls, and deletion procedures are set out in the Session Recording Policy (EL-SRP-002) and the Data Processing Agreement (EL-DPA-001).

9.3 Teachers and mentors must not retain Student or Mentee personal data on personal devices and must not photograph, screenshot, or otherwise capture any content from sessions.

9.4 Students' and Mentees' personal data is not used for marketing purposes. Images or recordings from sessions are not published, shared publicly, or used in any way other than as described in the Session Recording Policy.

10. RESPONDING TO AN ONLINE SAFETY INCIDENT

10.1 An online safety incident includes any of the following:

Inappropriate conduct by a teacher or mentor toward a Student or Mentee during a session

A Student or Mentee sharing harmful, illegal, or inappropriate content during a session

Unauthorised recording, screenshot, or distribution of session content by any party

A Student or Mentee reporting online grooming, exploitation, or abuse

A suspected data breach involving session recordings or student personal data

Any contact between an associate and a Student or Mentee outside the platform

10.2 All online safety incidents must be reported to the DSL immediately via the Ember Learning safeguarding reporting function within the Platform and by direct telephone contact. The DSL will assess and manage the incident in accordance with the Child Protection and Safeguarding Policy.

10.3 Where an incident involves a potential criminal offence (including the creation, sharing, or possession of child sexual abuse material), the DSL will contact the police without delay.

10.4 Where an incident constitutes a personal data breach, the DSL will follow the breach notification procedure set out in the Data Processing Agreement (EL-DPA-001).

11. TRAINING

11.1 All teachers and mentors must complete online safety training as part of mandatory pre-commencement training. This training covers: online risks relevant to all ages served by the Company; recognising and reporting online harm; the Company's platform rules and conduct expectations; and prohibited behaviours.

11.2 The DSL and Deputy DSL must maintain current knowledge of online safety risks and guidance, including annual update training.

11.3 Training completion records are maintained by the DSL.

12. LINKED POLICIES AND DOCUMENTS

Child Protection and Safeguarding Policy (EL-CPSP-001)

Session Recording Policy (EL-SRP-002)

Teacher and Mentor Agreement (EL-TMA-SE-003A or EL-TMA-E-003B) — Clauses 6 (Conduct), 7 (Confidentiality), and 8 (Data Protection)

Safer Recruitment Process (EL-SRP-001)

Data Processing Agreement (EL-DPA-001)

13. POLICY REVIEW

This Policy will be reviewed annually and following any significant online safety incident, update to KCSIE or the Online Safety Act guidance, or material change to the platform used for delivery.

Policy Owner:	Jack Bradley, Director & Designated Safeguarding Lead
Date Adopted:	1 September 2026
Next Review Due:	1 September 2027 (or earlier if a trigger event occurs)
Approved by:	Jack Bradley, Director, 1 September 2026