

Hope International Education (UK) Ltd

Online Safety Policy

Policy Statement

This document is based on the most recent guidance from the Department for Education *Keeping Children Safe in Education*, and NSPCC advice on Online Safety. The effectiveness of the policy will be monitored and reviewed annually through the number of reported incidents of a breach of online safety.

Staff and Homestays

The Hope International Education (UK) Ltd Code of Conduct for Staff and homestays has been made available and explained to staff and homestays to ensure that there is an awareness of how to communicate online with students as well as how to minimise the risks attached to digital and video images of them. Homestays play a crucial role in ensuring that the students who stay with them use the internet and mobile devices in accordance with the guidance contained within this policy and the Homestay Handbook. The DSL (or DDSL in their absence) takes the lead with online safety and will deal with any concerns raised as outlined in the procedures included in this policy.

Training

The Designated Safeguarding Lead (DSL) and any Deputy Designated Safeguarding Leads (DDSLs) will undertake safeguarding training, including online safety training, at a level appropriate to their role. Where online safety is not sufficiently covered within safeguarding training, additional training and professional development will be undertaken to ensure that the DSL and DDSLs have the knowledge and skills required to carry out their responsibilities effectively.

The DSL will ensure that online safety forms an integral part of safeguarding and child protection training, policies and procedures. Relevant online safety information, emerging risks, safeguarding updates and best practice guidance will be shared with staff and homestay hosts on a regular basis to enable them to recognise, respond to and report online safety concerns appropriately.

All staff and homestay hosts will receive safeguarding and online safety updates, as appropriate, to ensure they remain aware of current risks, trends and safeguarding responsibilities relating to the online environment.

Key Safeguarding Contact Details

Role	Name	Telephone Number	Email
Designated Safeguarding Lead (DSL)	Mei XIAN	07305020013	m.xian@hope-studyabroad.com

Students

Students are responsible for using the internet, mobile devices and other online technologies in accordance with the guidance set out in the Student Handbook and any applicable school, homestay and guardianship organisation policies. HOPE International Education (UK) Ltd recognises that online safety is an essential part of safeguarding and requires a whole-organisation approach involving students, staff, homestay hosts, parents and partner organisations.

Students will be supported to understand how to stay safe online and will be encouraged to report any concerns, inappropriate content, harmful online interactions or misuse of technology. Students will be provided with information about how to seek help and report concerns to trusted adults, the school, homestay hosts, guardianship staff or relevant online platforms.

Online Safety – Areas of risk

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective approach to online safety empowers schools, colleges, guardianship organisations and homestay hosts to protect and educate children in their use of technology and establishes mechanisms to identify, respond to, report, manage and escalate concerns where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four broad areas of risk:

Content – being exposed to illegal, inappropriate or harmful content, including pornography, misinformation, disinformation (including fake news), **conspiracy theories**, racism, misogyny, self-harm content, suicide-related content, antisemitism, radicalisation, extremism and other harmful material.

Contact – being subjected to harmful online interaction with other users, including peer-on-peer abuse, bullying, coercion, commercial exploitation, and adults posing as children or young people in order to groom, exploit or abuse children for sexual, criminal, financial or other purposes.

Conduct – personal online behaviour that increases the likelihood of, or causes, harm. This includes cyberbullying, online harassment, sharing personal information inappropriately, making, sending, receiving or sharing explicit images, including consensual and non-consensual sharing of nude and semi-nude images and videos, and other unsafe online behaviours.

Commerce – risks relating to online activity involving financial gain or loss, including online gambling, inappropriate advertising, phishing, financial scams, fraudulent activity and other forms of online exploitation.

Any concerns regarding online safety, online abuse, exploitation, harmful content, cyberbullying, inappropriate online behaviour or online scams should be reported promptly in accordance with the organisation's safeguarding procedures. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

What is online abuse?

The NSPCC defines online abuse as any type of abuse that takes place using digital technology or online platforms. Online abuse can occur across any internet-enabled device, including computers, tablets, mobile phones, gaming consoles and other connected devices. It can take place through:

- social media platforms;
- text messages and messaging applications;
- emails;
- online forums, chat rooms and discussion groups;
- online gaming platforms;
- live-streaming services; and
- other online communication platforms and digital technologies.

Children and young people may experience a range of online harms and abuse, including cyberbullying, online harassment, grooming, child sexual abuse, child sexual exploitation, child criminal exploitation (including county lines), coercive behaviour, financial exploitation, radicalisation, emotional abuse and technology-facilitated abuse. Children may be harmed by individuals known to them, as well as by strangers online. Online abuse may occur in isolation or may form part of abuse taking place offline.

Children and young people may also be exposed to, or involved in, the creation, sharing or distribution of nude and semi-nude images and videos, harmful content, misinformation, disinformation, online scams or other inappropriate online activity.

HOPE International Education (UK) Ltd recognises its responsibility to identify, respond to and report concerns relating to online abuse at the earliest opportunity so that appropriate safeguarding action can be taken to protect children and young people. Any concerns regarding online abuse, exploitation, cyberbullying, harmful online content, inappropriate online behaviour or other online safeguarding risks will be managed in accordance with the organisation's Safeguarding and Child Protection Policy and associated safeguarding procedures.

HOPE International Education (UK) Ltd also maintains an Anti-Bullying Policy (including cyberbullying) which outlines the procedures for preventing, reporting and responding to incidents of bullying and cyberbullying.

Possible signs of online abuse:

Possible Signs of Online Abuse

Children and young people who are experiencing online abuse, exploitation or other online harms may demonstrate changes in behaviour. While these signs do not necessarily indicate abuse, they should be considered in the context of the child's circumstances and any other safeguarding concerns. Possible indicators may include:

- spending significantly more or less time than usual online, texting, gaming or using social media;
- appearing upset, anxious, withdrawn, distressed, angry or secretive following online activity;
- being reluctant to discuss their online activity or becoming unusually protective of their devices;
- receiving excessive communications, messages or contacts from unknown individuals;
- having multiple new phone numbers, email addresses, social media accounts or online profiles;
- changes in mood, behaviour, attendance, engagement or relationships;
- displaying signs of bullying, coercion, exploitation or emotional distress linked to online activity;
- becoming involved in risky online behaviour, inappropriate online relationships or the sharing of personal information, images or videos.

Some indicators of online abuse may also be associated with other forms of abuse, including cyberbullying, child sexual abuse, grooming, child sexual exploitation, child criminal exploitation, emotional abuse and technology-facilitated abuse. Concerns regarding a child's online safety may arise through disclosures from students, reports from schools, observations by staff or homestay hosts, incident reports, communications from parents or guardians, or information received from partner organisations and external agencies.

Any concerns relating to online abuse, exploitation, harmful online content, cyberbullying, inappropriate online behaviour or other online safety risks will be treated as safeguarding concerns and managed in accordance with HOPE International Education (UK) Ltd's Safeguarding and Child Protection Policy and procedures.

Staff and homestay hosts should report concerns promptly to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) in accordance with the organisation's safeguarding reporting procedures.

Set Boundaries

HOPE International Education (UK) Ltd encourages homestay hosts to agree clear expectations with students regarding the safe and responsible use of the internet, mobile devices, social media and other online technologies. Homestay hosts should support students to stay safe online and encourage open discussions about online activity and online safety.

Where concerns arise about a student's online behaviour or safety, homestay hosts should report these concerns to HOPE International Education (UK) Ltd in accordance with the Safeguarding and Child Protection Policy. Where appropriate, reasonable measures may be put in place to promote safe online behaviour, including increased supervision, online safety education or temporary restrictions on internet or device use.

Below is some suggested advice for talking to children about online safety:

[Having a conversation with your child \(thinkuknow.co.uk\)](https://www.thinkuknow.co.uk)

[Teaching Your Child about Internet & Online Safety | NSPCC](#)

Filters and monitoring

HOPE International Education (UK) Ltd expects homestay hosts to take reasonable steps to minimise students' exposure to harmful or inappropriate online content and to promote safe use of the internet within the home. Homestay hosts should ensure that appropriate filtering, monitoring and parental control measures are in place, taking into account the age and needs of the students in their care and the devices and internet services available within the home.

Homestay hosts are encouraged to make use of privacy settings, parental controls and internet safety features provided by internet service providers, device manufacturers and online platforms where appropriate. The UK Safer Internet Centre has guides for parental controls (homestays)

<https://saferinternet.org.uk/online-issue/parental-controls>

The NSPCC provide advice for homestays on parental controls which allow a number of different things to happen including planning what time of day children can go online for, filtering and blocking content, setting different profiles so that each family member can access age appropriate content and restricting information that can be shared: <https://www.nspcc.org.uk/keeping-children-safe/online-safety/parental-controls/>

Staying safe on mobiles, smartphones and tablets

The NSPCC has advice for staying safe on all types of devices, including mobiles, smartphones and tablets. Full details can be found on the website:

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/>

Childline also provide useful information for students:

<https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/> This includes guidance on mobile phone safety and the sharing of nude and semi-nude images and videos.

Information on the sharing of nude and semi-nude images and videos:

<https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/>

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/sexting-sending-nudes/>

Childnet have produced a very useful guidance for students who have made a mistake sending nude pictures:

<https://www.childnet.com/help-and-advice/nudes-11-18-year-olds/>

Social network sites

Children and young people use the internet and online technologies for communication, learning, entertainment and social interaction. This may include the use of search engines, social media platforms, messaging services, video-sharing platforms, online forums, apps, gaming platforms and other online services.

Homestays are advised to ensure that their own children and/or Hope International Education (UK) Ltd students know where the reporting functions are on each of the sites they use, how to block someone and how to keep information private.

The NSPCC encourage talking to children about online safety:

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/talking-child-online-safety/>

Further reading:

NSPCC Online Safety: <https://www.nspcc.org.uk/keeping-children-safe/online-safety/>

Child Exploitation and Online Protection Centre:

CEOP: Child Exploitation & Online Protection Centre – internet safety

CEOP: Thinkuknow: [CEOP Education \(thinkuknow.co.uk\)](https://www.thinkuknow.co.uk)

UK Safer Internet Centre:

[Homepage - UK Safer Internet Centre](https://www.saferinternet.org/)

Internet matters – helping parents keep their children safe online:

[Information, Advice and Support to Keep Children Safe Online \(internetmatters.org\)](https://www.internetmatters.org/)

How social media is used to encourage travel to Syria and Iraq: A briefing note

[The use of social media for online radicalisation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/614441/20190521-social-media-radicalisation-briefing-note.pdf)

Procedure for dealing with an incident which involves online services:

1. A member of HOPE International Education (UK) Ltd staff receives a report or becomes aware of a concern relating to online safety, online abuse, cyberbullying, exploitation, inappropriate content, harmful online behaviour or any other online safeguarding risk. Concerns may be raised by a student, parent, homestay host, school, staff member or another source.
2. Hope International Education (UK) Ltd Staff member will respond in accordance with the Safeguarding and Child Protection Policy and make a contemporaneous record of the concern using the organisation's safeguarding recording procedures. Where the concern is disclosed by a student, the staff member should listen carefully, avoid asking leading questions and record the information accurately.
3. The concern must be reported to the Designated Safeguarding Lead (DSL), or Deputy Designated Safeguarding Lead (DDSL) in their absence, as soon as possible. A written record of the concern must also be submitted in accordance with safeguarding procedures.
4. The DSL will assess the nature and level of risk, consider any immediate safeguarding concerns, and determine the appropriate course of action. This may include obtaining further information,

consulting with the school, parents, homestay hosts or relevant agencies, making referrals where appropriate, and implementing measures to safeguard the child.

5. All actions, decisions, discussions and outcomes will be recorded and retained securely in accordance with the organisation's safeguarding recording and record-retention procedures.

6. The DSL will ensure that appropriate support is provided to the child or young person, taking into account their welfare, wellbeing, needs and any vulnerabilities identified through the safeguarding assessment. Support may include helping the child to understand online safety risks, recognise potentially harmful situations, develop safe online behaviours and access appropriate advice and guidance. Where appropriate, the DSL may work with the school, parents, homestay hosts and other relevant professionals to ensure that suitable support and protective measures are in place.

Information, advice and support may be obtained from recognised organisations and services, including schools, the NSPCC, Childline, the National Crime Agency (NCA), the Child Exploitation and Online Protection Command (CEOP) and other relevant safeguarding agencies.

7. The DSL will ensure that any decision to view images, videos or other online content is only made where there is a clear safeguarding reason to do so. Wherever possible, decisions will be based on reliable information about the nature of the content rather than direct viewing. Staff should not intentionally view, copy, print, share, store or delete nude or semi-nude images unless there is a clear and justifiable reason for doing so and the action is in accordance with safeguarding procedures and current guidance. Where it is considered necessary to view an image or video, the DSL will follow the current UK Council for Internet Safety (UKCIS) guidance, *sharing nudes and semi-nudes: advice for education settings working with children and young people*, together with any relevant school procedures. Where possible, another appropriately trained senior member of staff should be present when any viewing takes place, and a written record should be made of the reasons for viewing the content, who was present and any actions taken. The welfare of the child or young person will remain the primary consideration throughout the management of the incident.

8. The DSL will consider whether it is necessary and proportionate to secure access to a device or preserve evidence as part of the safeguarding response. Any decision to view images, videos or other content, or to take possession of a device, will be made in accordance with current safeguarding guidance and the best interests of the child.

Any viewing of images, videos or other content, and any action taken in relation to a device, will be fully recorded, including the reasons for the action, the individuals present, the date and time, and any subsequent safeguarding actions taken.

9. The DSL will consider whether it is appropriate to contact any other school, college, educational setting, agency or individual involved in the incident and whether parents, carers or those with parental responsibility should be informed. In most cases, parents or carers should be involved and kept informed of concerns relating to their child. However, the DSL will consider the child's welfare and best interests when making this decision. Parents or carers will not be informed where there is reason to believe that doing so may place the child at risk of harm or may prejudice a safeguarding investigation. Any decision not to inform parents or carers, together with the reasons for that decision, will be recorded by the DSL.

10. The DSL will make an immediate referral to Children's Social Care and/or the police where there is reason to believe that a child or young person has suffered harm, is at risk of significant harm, or may be the victim of abuse, exploitation or a criminal offence. In an emergency, or where a child is believed to be at immediate risk of harm, the police should be contacted by dialling 999.

Factors which may indicate the need for an immediate referral include, but are not limited to:

- the involvement of an adult;
- concerns that a child has been coerced, groomed, exploited or blackmailed;
- concerns regarding a child's ability to give informed consent;
- content that indicates abuse, exploitation, violence or other criminal activity;
- concerns that a child may be at immediate risk of physical or emotional harm.

Where illegal online activity or content is identified and there is no immediate safeguarding risk, the DSL may seek advice from or make a report to CEOP (Child Exploitation and Online Protection Command), the police or another appropriate agency.

Where the DSL determines, following a risk assessment, that the incident can be managed within Hope International Education (UK) Ltd's safeguarding procedures without referral to Children's Social Care or the police, appropriate support and protective measures will be put in place.

All decisions, actions taken, reasons for those decisions and any reviews of the risk assessment will be recorded in accordance with the Safeguarding and Child Protection Policy. The DSL may escalate

the matter to Children's Social Care, the police or another relevant agency at any stage if further information or concerns come to light.

11. Where the DSL determines that the incident can be managed without referral to Children's Social Care or the police, consideration should be given to preventing any further sharing of images, videos or other harmful content. Where appropriate, children and young people may be supported and encouraged to delete images, videos or content from their devices, online accounts and social media platforms. Advice should be provided on how to remove content and reduce the risk of further sharing.

The welfare and best interests of the child will remain the primary consideration when deciding what action to take. Children and young people should be supported to understand the risks associated with creating, possessing and sharing nude and semi-nude images and videos.

Any decision to search a device, view content, preserve evidence or request the deletion of content will be made by the DSL based on a risk assessment and professional judgement, and in accordance with current safeguarding guidance and Safeguarding and Child Protection Policy of Hope International Education (UK) Ltd.

All decisions, actions taken, reasons for decisions, dates and times will be recorded in the safeguarding records. Parents, carers or those with parental responsibility will normally be informed and involved unless there is reason to believe that doing so may place a child at risk of harm or prejudice a safeguarding investigation. Any decision not to inform parents or carers will be recorded by the DSL together with the reasons for that decision.

12. Where the DSL is aware that a member of staff has unavoidably viewed nude or semi-nude images, videos or other potentially harmful content involving a child or young person, the DSL will ensure that appropriate support is offered to that member of staff.

Viewing such content may be distressing, and consideration should be given to the emotional wellbeing and welfare of those involved. Appropriate advice, supervision and support should be made available where required.

13. Where police action has been instigated for an incident involving a member of staff, homestay host or volunteer, HOPE International Education (UK) Ltd will follow its safeguarding procedures and seek advice from the LADO, where appropriate. Internal procedures may take place following the

conclusion of any police investigation. Suspension is not automatic and will only be considered where necessary.

Responding to an incident of the sharing of nude and semi-nude images and/or videos

HOPE International Education (UK) Ltd will respond to incidents involving the creation, possession or sharing of nude and semi-nude images and/or videos involving children and young people in accordance with current safeguarding guidance, including the UK Council for Internet Safety (UKCIS) guidance, *Sharing nudes and semi-nudes: advice for education settings working with children and young people*, and the principles set out in Keeping Children Safe in Education (KCSIE).

Remote learning

Staff and homestay hosts should be aware that where students are required to learn remotely, the school or college's remote learning, online safety and safeguarding policies should be followed.

Homestays and guardians supporting remote learning should ensure that any safeguarding concerns are reported in accordance with HOPE International Education (UK) Ltd.'s Safeguarding and Child Protection Policy.

Further guidance can be found from:

[GOV.UK – Safeguarding and Remote Education](#)

[NSPCC – Safeguarding and Child Protection for Tutors](#)

The Prevent Duty

HOPE International Education (UK) Ltd recognises its responsibilities under the Prevent Duty and acknowledges that children and young people may be vulnerable to radicalisation and exposure to extremist content or influences, including online.

Online risks may include exposure to extremist or terrorist material, contact with individuals or groups seeking to radicalise young people, or engagement with online content that promotes hatred, violence or harmful ideologies.

Students may also be exposed online to misinformation, disinformation and **conspiracy theories** that seek to manipulate opinions, encourage harmful beliefs or undermine trust in reliable sources of

information. Staff, guardians and homestay hosts should encourage students to think critically about online information, consider the credibility of sources and discuss any concerns with a trusted adult. Any concerns that a student may be vulnerable to harmful online influences, including extremist narratives or conspiracy theories, should be reported promptly to the Designated Safeguarding Lead (DSL).

Staff and homestay hosts should remain vigilant to signs that a student may be vulnerable to radicalisation and should report any concerns promptly to the Designated Safeguarding Lead (DSL) or Prevent Lead in accordance with safeguarding procedures.

Further information can be found in the organisation's Anti-Radicalisation and Prevent Policy.

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on:30/07/2026.....

Signed:*M. Xia*.....

Date:30/07/2026.....