

POLICY – Remote Learning

Education Universal

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Policy Approver	Jo Dunn, Compliance, Regulation and Quality Director
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Staff groups affected	All Education

Monitoring and Review

This policy will be monitored on an ongoing basis through the service's established governance and quality assurance systems. Responsibility for ensuring that the policy remains compliant with legislation and regulatory frameworks sits with the Proprietor Representative and Regional Lead.

A formal review of this policy will be undertaken no later than three years from the date of approval, or sooner if changes in legislation, regulatory guidance, or operational requirements necessitate it.

The Head of Policy will support this process by identifying relevant changes in legislation, regulation, national standards and emerging best practice. The Head of Policy will also incorporate learning from inspections, audits and practice developments into future revisions whilst overseeing all proposed amendments to the universal content to ensure accuracy, consistency and compliance.



Abigail Salisbury-Headteacher

Terminology

Our aim is to use consistent terminology throughout this policy and all supporting documentation as follows:

Term	Definition
'Establishment' or 'Site'	A generic term referring to the school/college owned by CareTech.
Learner	Any child or young person under the age of 18, or young adult over 18 who receives education.
Service Head	The senior person with overall responsibility for the school/college.
Tutor/Teacher	Members of staff who have teaching responsibility for learners at the school/college.
Parent/Carer	Parent or person with parental responsibility.
Regulatory Authority	The independent regulatory body responsible for inspecting and regulating services (e.g., Ofsted, Estyn, Education Scotland).
Social Worker	The worker allocated to the individual learner; if none is allocated, the Duty Social Worker or Team Manager is responsible.
Placing Authority	The local authority/agency responsible for placing the learner or commissioning the service.
Local Authority	The local authority for the establishment's location.
Staff	All staff working at the location, including employed staff, students on placement, contractors, agency staff, volunteers and proprietors.

1. Local School/College Profile

Devon School is an independent specialist provision for students aged 7 to 18 with Social, Emotional and Mental Health (SEMH) needs. We provide a nurturing and supportive environment where students can access learning that is tailored to their individual needs. Our approach focuses not only on academic progress, but also on helping every student develop confidence, self-esteem, resilience and positive relationships. At Devon School, we believe that every young person deserves the opportunity to succeed and to discover their strengths in a safe and compassionate learning community.

At Devon School, our vision is to collaborate with students and families to create a respectful and compassionate school community. We aim to foster a lifelong love of learning, empowering everyone to become the best versions of themselves.

Our school community is guided by five core values that shape everything we do:

- Respect
- Honesty
- Responsibility
- Resilience
- Kindness

These values help us create a positive environment where students feel safe, valued and supported to grow.

2. Purpose

The purpose of this policy is to make sure learners can move back into education successfully after a period away from the site. Remote or blended learning may be used where a learner is not able to attend because of fixed term exclusions, being missing from care or home for more than three days, long term sickness (longer than one week), sustained refusal to attend, serious incidents including those involving the police, extreme aggression or threats, or bringing a weapon into school. These examples are not exhaustive, but they reflect common triggers for short, structured periods of learning away from the site.

3. Scope

This organisational policy applies across all education sites, services and functions. It establishes the universal standards and expectations that must be followed consistently throughout the organisation.

Each site implements these standards in accordance with the statutory and regulatory requirements of the nation in which it operates as set out in Appendix A–C.

The policy covers remote/blended delivery of academic, vocational, technical and employability components, including English and maths where required. It includes work preparation, Supported Internships and industry placements (e.g., T Level) where applicable.

The policy also underpins a variety of remotely delivered activities including: scheduled online sessions; paper-based work packs; and blended home/community/school sessions.

4. Local Adaptation Requirement

Some sections in this policy are completed by each site to reflect local operational procedures or national equivalents (e.g., safeguarding framework, inspection remit, curriculum/quality framework, data protection contacts).

Where England specific statutory references appear in the universal policy, sites in Wales and Scotland insert their own national equivalents into the marked sections.

All local additions are:

- Accurate
- Up to date
- Consistent with national legislation and regulator guidance
- Fully aligned with the universal standards in this policy

Where no local adaptation or local equivalent is required, the universal content remains fully applicable.

5. Legal and Regulatory Context

Devon School is governed by the statutory duties, safeguarding requirements and inspection arrangements of the nation in which it operates. The universal standards in this policy are implemented in line with the correct national frameworks set out in Appendices A–C, which summarise the legal, regulatory and inspection requirements for England, Wales and Scotland.

6. Purpose

2.1 Why we provide remote learning

2.2 Our responsibility to each learner

At Devon School every learner has a legal entitlement to education. Any learner on a reintegration or reduced timetable is at heightened risk of missing education; they must therefore be identified quickly, tracked rigorously and supported purposefully by school/college leaders. We keep a learner support file with a clear chronology of reasons, actions and outcomes throughout the reintegration period.

In line with national guidance, this policy requires robust oversight of learners who are struggling to attend education and provides comprehensive and flexible support strategies.

2.3 What learning looks like during reintegration

Learning is always matched to age, ability, aptitude and any special educational or emotional needs. Where appropriate, it aligns with a learner's Key Stage and meets National Curriculum requirements, while remaining accessible in line with their EHCP or site assessment and teacher/instructor observation.

During reintegration, learners follow a reduced timetable with English and maths at its core, plus targeted subjects and activities that rebuild skills, confidence and relationships. Where it helps, we use alternative provision to support the learner's return to site. Alongside the curriculum, we work with the learner to understand and address the reasons they were previously out of school.

2.4 Reduced timetables

In exceptional circumstances the site may implement a reduced timetable for an unspecified period to facilitate a safe and supported return to education thus aligning with national guidance to remove barriers to attendance.

Our aim is that every learner can access our curriculum with a reintegration timetable being a flexible and short-term (normally up to four weeks) strategy to support a successful return to the school community.

A timetable is "reduced" if it falls below the mandatory education hours for a compulsory aged learner. Reduced timetables are time limited, reviewed weekly and adjusted in response to progress, risk and readiness. Decisions are based on the learner's needs and are recorded transparently.

2.5 Reintegration period

The standard expectation is up to four weeks, extendable to one half term in exceptional cases. If a learner is not engaging or cannot re-join safely at the end of that period, we review and, where justified, extend the reintegration with a clear plan and rationale.

2.6 When and how remote or blended learning is used

We use remote/blended learning after a major incident, a Serious Untoward Incident (SUI) or where behaviours, circumstances or complex needs mean routine teaching is not safe or feasible.

Remote learning may be synchronous or asynchronous, using approved technology; it can also be paper based. Examples include: structured study packs; narrated materials; live online lessons (recorded where appropriate); community-based sessions arranged by the site; and Teams or similar platforms to allow access to subject teachers/tutors.

6. Roles and Responsibilities

- Headteacher oversees authorisation, risk and quality
- Regional Lead provides governance and escalation
- The DSL leads safeguarding for children
- The SENCO ensures provision aligns with EHCP
- The DPO advises on UK GDPR and platform use
- Where relevant, the Exams Officer/Quality Nominee assures compliance with awarding organisations and JCQ, including access arrangements
- Heads of Faculty/Programme Leads adapt vocational/practical elements for remote delivery
- Teachers/tutors plan and assess learning, keep registers, give feedback and escalate concerns
- Support staff maintain engagement and records
- IT teams provide secure platforms, devices and support
- Parents/carers support attendance and a safe learning environment
- Learners engage, participate and follow the code of conduct

7. Safeguarding, Child Protection and Online Safety in Remote Contexts

Remote learning is delivered only through site-approved platforms and follows clear expectations for camera use, backgrounds and recording. Any 1:1 session is risk assessed, approved and logged; parent/carer presence is encouraged where appropriate. Staff use no personal contact details.

Concerns are recorded immediately on the site safeguarding system and escalated to the DSL. Home and community sessions follow lone-working and visit risk assessments.

8. Data Protection, Privacy and Information Security

Remote learning complies with UK GDPR/DPA 2018. Sites use approved platforms following a DPIA, collect only necessary data, apply retention schedules and avoid recording live sessions unless there is a lawful, approved and communicated reason. Devices and paper packs are issued and stored securely. Any incident is reported to the DPO using the local route.

9. Accessibility, Reasonable Adjustments and SEND

Provision aligns with each learner's EHCP and IEP. Materials, pace and feedback are adjusted; assistive technology is provided where required. SEMH needs, sensory

profiles and behaviour plans are factored into delivery. Alternative formats, including paper, are offered as needed.

10. Attendance and Engagement

Staff keep registers for every remote session and follow clear escalation steps (calls, messages, home visits) when contact is not made. Attendance codes are applied according to national rules and site policy. Engagement is tracked and reviewed weekly during reintegration.

Attendance codes during reintegration

SLT will confirm codes if required:

- C for agreed non-attendance during reduced timetables
- B for off-site educational activity set up by Education (with risk assessments shared appropriately)
- D for dual registration where a learner attends another provision (e.g., college) other than Devon School.

11. Process, Monitoring and Review

When the Remote Learning policy is initiated, the Head Teacher maintains oversight to ensure the safety and safeguarding of learners and staff at Devon School.

SLT informs parents/carers of the plan and becomes the main point of contact for timetables, reviews and meetings. Learners receive a timetable with daily English and maths and targeted activities to meet academic, behavioural and SEMH needs. Links for online sessions are sent in advance to parents/carers or social workers.

Stages of reintegration

- Stage 1: The Head Teacher and Regional Lead review the reasons for remote learning, consider safeguarding impact and put risk assessments in place.
- Stage 2: A structured timetable is delivered at home or in the community, aligned to IEP targets. Teachers/tutors send work appropriate to the learner's level. Home visits may be arranged where appropriate.
- Stage 3: A staggered return blends on-site sessions with community and home learning. Learners first demonstrate engagement and safe behaviours in the community before on-site sessions increase.
- Stage 4: Success is reached when the learner attends on site and accesses education appropriately, full time or part time depending on need.

Review cycle

The Head Teacher meets bi-weekly with Education Staff and the Regional Lead to agree next steps. The learner may remain at their current stage or progress. An early review may be called at any time due to an incident, significant progress or where changes are needed.

What success looks like

The learner works within Devon School without the behaviours that prompted reintegration, engages in lessons, understands the reasons for the changes and is making positive choices that support a sustained return.

Records and evidence

All information sits in the learner's 'Reintegration File' at Devon School: engagement records, timetables, minutes, updates to plans, incidents, PCPs and any Missing from Education actions.

12. Risk, Health & Safety (Including Practical/Vocational Learning)

Before remote or blended delivery begins, staff complete or refresh an individual risk assessment and review it weekly during reintegration. Risks considered include behaviour, online safety, lone working, home visits, device and data security, environment suitability and the safety of community venues.

For practical/vocational components, the site sets out which outcomes can be taught or assessed remotely, which can be simulated, and which must remain on site for validity and safety. Where any activity is attempted at home, we set clear safety controls (equipment, supervision, PPE, environment checks).

13. Technology, Access and Contingency

We provide or loan devices and connectivity where needed and keep an asset log and user agreements. Sites publish approved platforms and acceptable use standards. If live access is not possible, we use paper packs, asynchronous materials and scheduled telephone/video tutorials. Technical support routes and response times are published.

14. Quality Assurance, Assessment Integrity and Awarding Bodies

Remote learning mirrors planned curriculum intent and IEP targets. Quality is checked through remote observations, work scrutiny, assessment sampling and learner/parent feedback.

Where awarding bodies are involved, sites follow their rules and JCQ expectations for online assessment, authenticity and invigilation. Assessments are not recorded unless permitted and justified. Assessment materials are handled securely; standardisation and moderation continue remotely. Reasonable adjustments/access arrangements are implemented in line with awarding body/JCQ rules.

A termly evaluation is reported to the Headteacher/ Regional Lead with agreed improvement actions.

15. Communication and Multi-Agency Working (Including Employers)

We share the plan, schedule and expectations with parents/carers and agree how we will keep in touch. Where applicable, we coordinate with social workers, placing authorities and virtual schools, keeping minutes and sharing actions securely.

For industry placements and apprenticeships/work-based learning, we ensure safeguarding, supervision, employer checks, insurance and health and safety are in

place. When a physical placement is not viable, we use remote/virtual projects with clear supervision and feedback. Tripartite reviews for apprenticeships can be conducted remotely with employer input and saved evidence.

16. Staff Training and Competence

Staff complete training on remote pedagogy, online safety/safeguarding (including adult safeguarding for 18+), data protection and platform use. Training records are maintained and reviewed as part of QA.

17. Equality, Diversity and Inclusion

Delivery aligns to the Equality Act 2010. We make reasonable adjustments, remove barriers and ensure materials reflect diverse needs and backgrounds.

18. Remote Learning Code of Conduct

Learners attend on time, use site accounts, present appropriately online, follow camera/mic instructions, behave respectfully, complete and submit work, and do not record or share sessions without permission.

Staff use professional accounts and approved settings, maintain professional boundaries, take registers, keep records and escalate concerns promptly.

19. Appeals

2.1 Parents/guardians/carers may appeal a decision to initiate remote learning by writing to the Regional Lead within one week of the decision.

2.2 A written response will be issued within 10 days of receipt.

2.3 Outcomes may include: an immediate full return to school/college; confirmation that the Remote Learning process remains appropriate; or recommendations/alternative solutions.

The outcome will be communicated to the parents/guardians/carers and the Headteacher. All matters are handled confidentially and shared only with those who need to know.

20. Related Policies and Documents

- Blended/Remote Learning
- Attendance
- Safeguarding & Child Protection
- Online Safety/Acceptable Use
- Behaviour/Relationships & Engagement
- SEND/ALN/ASN
- Data Protection/Information Governance
- Health & Safety
- Lone Working
- Educational Visits



Appendix A

Legislation, guidance and regulatory frameworks underpinning Remote Learning in England.

DfE Guidance - Providing remote education: guidance for schools (applies to capability and practice)

- **Means:** DfE guidance on maintaining capability to deliver high-quality remote education when some or all learners cannot attend in person (leaders, governing boards; useful for post-16 in schools/colleges planning continuity).
- **Requires:** A standing remote plan; alignment to the taught curriculum; inclusion/SEND adjustments; monitoring engagement and access; proportionate use of live/recorded/asynchronous modes. Inspectors expect coherent intent, implementation and impact.
- **Our stance:** Every site (school/college) holds an annually reviewed Remote Education Plan embedded in curriculum and QA.
- **Implementation example:** Plan + staff briefings + weekly engagement dashboards filed with curriculum maps and reintegration protocols.
- **Links:** <https://www.gov.uk/government/publications/providing-remote-education-guidance-for-schools>

Keeping children safe in education (KCSIE) (schools and colleges)

- **Means:** Statutory safeguarding guidance for **schools and colleges** (16–19 provision included); covers online/remote contexts, filtering/monitoring, safe conduct in live/recorded sessions and 1:1s.
- **Requires:** DSL oversight; staff training; platform controls; immediate recording/escalation of concerns; inspectors check culture and compliance.
- **Our stance:** Only approved platforms; fixed remote session protocols (camera/chat/recording/1:1) set by DSL; all concerns go straight to the safeguarding system.
- **Implementation example:** Remote session checklist used by teachers/tutors; DSL weekly sample-checks logs and referrals.
- **Links:** <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Working together to improve school attendance (statutory) 2024

- **Means:** Sets roles and lawful processes for school attendance, part-time timetables and education off-site; drives when remote provision is appropriate for school-aged learners.



- **Requires:** Accurate registers; correct codes for off-site education; early help/escalation for non-contact; evidence of reviews for any reduced timetable. Ofsted evaluates attendance culture and practice.
- **Our stance:** Reduced/reintegration timetables are short, reviewed weekly, lawfully coded; remote learning is a continuity tool of last resort. (Post-16 colleges evidence attendance/participation through EIF expectations below.)
- **Implementation example:** 'Reintegration File' includes timetable, risk assessment and weekly review with lawful attendance codes.
- **Links:** <https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>

The Education (Independent School Standards) Regulations 2014

- **Means:** Minimum standards all *independent schools* in England must meet across education quality, welfare/health/safety, premises, information, complaints, and leadership/management.
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- **Requires:** Remote learning must uphold Part 1 curriculum quality and assessment, Part 3 safeguarding/behaviour/health & safety (including online safety), Part 5 premises/IT safety, Part 6 information for parents, Part 7 complaints handling, and Part 8 leadership oversight and record-keeping. Inspectors/regulators assess compliance against these parts.
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- **Our stance:** Where we operate as an independent school, our Remote Education Plan explicitly maps evidence to Parts 1, 3, 5, 6, 7 and 8 and we hold an ISS compliance tracker alongside KCSIE/EIF evidence.
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- **Implementation example:** Single "Remote Learning & ISS" matrix showing: curriculum parity (Part 1), DSL protocols/logs (Part 3), device/network risk assessments (Part 5), parent communications pack (Part 6), complaints route (Part 7), and SLT oversight minutes (Part 8).
- **Links:** <https://www.legislation.gov.uk/ukxi/2014/3283>
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Education inspection framework (EIF) (schools and FE)

- **Means:** Ofsted's framework and toolkits used to inspect schools and FE skills; evaluates curriculum quality, inclusion, behaviour/attendance, safeguarding and leadership — irrespective of on-site or remote delivery.



- **Requires:** Evidence of coherent curriculum intent/implementation/impact; robust safeguarding and inclusion; proportionate monitoring of attendance/participation; providers align evidence to the relevant toolkit.
- **Our stance:** Sites keep one inspection evidence set for on-site and remote provision mapped to EIF evaluation areas and the current Ofsted toolkits.
- **Implementation example:** Inspection folder cross-references remote learning evidence to EIF evaluation areas and the applicable toolkit.
- **Links:** <https://www.gov.uk/government/publications/education-inspection-framework>

Data Protection Act 2018 / UK GDPR (all settings)

- **Means:** UK-wide data protection regime for all processing in remote learning (platforms, recordings, engagement data, paper packs, device loans).
- **Requires:** Lawful bases; DPIAs for platforms; minimisation; retention; security controls; DPO incident route; inspectors may review compliance evidence.
- **Our stance:** DPIAs are mandatory for all remote platforms; recordings only where lawful/necessary and communicated; approved encryption for sharing.
- **Implementation example:** DPO holds DPIAs/RoPA and retention references; annual staff briefing on secure remote practice.
- **Links:** <https://www.legislation.gov.uk/ukpga/2018/12/contents>

Legislation, guidance and regulatory frameworks underpinning Remote Learning in Wales.

Learning continuity guidance

- **Means:** National guidance on maintaining learning, safeguarding and wellbeing during disruption; requires contingency planning for continuity (applies to schools/PRUs; informs post-16 continuity planning alongside Estyn expectations).
- **Requires:** Clear continuity plans; mitigation of disruption; tailored support for vulnerable learners; defined roles and routes.
- **Our stance:** Each site (school/college) keeps a tested Learning Continuity Plan which triggers proportionate remote/blended delivery.
- **Implementation example:** Continuity Plan filed with risk assessment and communications for families/employers/EOTAS partners.
- **Links:** <https://www.gov.wales/learning-continuity-guidance-html>
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Keeping learners safe guidance 2022

- **Means:** Statutory safeguarding guidance for education under the Education Act 2002; sets expectations for governance, DSL roles, procedures and online/remote safety.
- **Requires:** Clear reporting routes; DSL oversight; staff training; alignment with Wales Safeguarding Procedures; inspection expects robust practice in any remote delivery.
- **Our stance:** Approved platforms and remote session protocols; 1:1s risk-assessed and logged; all concerns recorded immediately.
- **Implementation example:** DSL keeps a remote-learning addendum, 1:1 risk-assessment template and weekly log audit notes.
- **Links:** <https://www.gov.wales/keeping-learners-safe>

Independent School Standards (Wales) Regulations 2024

- **Means:** Prescribes the standards independent schools in Wales must meet for registration/inspection: quality of education, SMSC, welfare/health/safety, suitability of proprietors/staff, premises/boarding, information, complaints.
- **Requires:** Remote learning must maintain curriculum quality and assessment, robust safeguarding/online safety and behaviour, safe premises/IT equipment, transparent parent information, and effective complaints handling under proprietor oversight.



- **Our stance:** Where we operate as an independent school, our Remote Education Plan maps to the 2024 standards, with proprietor sign-off and evidence of safeguarding training and DBS cadence as required.
- **Implementation example:** Compliance file includes remote-session protocols and logs (welfare/safety), device loan risk assessments (premises), parent information pages (Part 6), and proprietor review notes (leadership).
- **Links:** <https://www.legislation.gov.uk/wsi/2024/27/made>
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Estyn – Inspection guidance (schools, PRUs, FE and work-based learning)

- **Means:** Estyn’s “How we inspect / What we inspect” handbooks define evidence expectations across sectors including FE and work-based learning; inspectors consider any remote delivery within quality areas.
- **Requires:** Providers evidence a coherent curriculum/assessment model, inclusion and safeguarding; QA and self-evaluation address remote practice where used.
- **Our stance:** Remote provision is evidenced against Estyn quality areas and included in self-evaluation and improvement planning (schools and FE).
- **Implementation example:** One self-evaluation file maps remote learning to Estyn headings, with samples of plans, engagement data and QA notes.
- **Links:** <https://estyn.gov.wales/inspection-guidance-resources/>

Data Protection Act 2018 / UK GDPR (all settings)

- **Means:** UK-wide data protection regime for remote platforms, recordings and data sharing.
- **Requires:** DPIAs, minimisation, secure handling, retention and DPO incident processes; leaders assure compliant practice.
- **Our stance:** DPIAs for platforms; privacy information for remote delivery published; secure, approved channels only.
- **Implementation example:** DPO pack includes DPIAs, retention references and evidence of staff briefings on secure remote practice.
- **Links:** <https://www.legislation.gov.uk/ukpga/2018/12/contents>

Appendix C — Scotland

Legislation, guidance and regulatory frameworks underpinning Remote Learning in Scotland.

Supporting remote learning guidance 2020 (Education Scotland)

- **Means:** National hub signposting policy and guidance for remote learning, including expectations, resources and platforms (e.g., Glow, National e-Learning Offer).
- **Requires:** Leadership of remote learning aligned to national advice; proportionate use of synchronous/asynchronous methods; inclusion and wellbeing in design.
- **Our stance:** Sites select approaches to fit learner needs, using Glow/approved tools with documented staff/learner protocols.
- **Implementation example:** Site Remote Learning Guide covers platforms, accessibility, recording rules and escalation routes.
- **Links:** <https://education.gov.scot/resources/supporting-remote-learning/>
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National Guidance for Child Protection in Scotland (updated 2023)

- **Means:** National multi-agency guidance describing responsibilities and expectations for protecting children; applicable to remote/online contexts and education services.
- **Requires:** Local procedures, IRDs, information-sharing and records; leaders evidence practice and oversight during remote delivery.



- **Our stance:** DSP procedures explicitly cover remote contacts, recordings and escalation; audits include remote session logs.
- **Implementation example:** Weekly audit of remote logs and CP entries during any remote period, with actions recorded.
- **Links:** <https://www.gov.scot/publications/national-guidance-child-protection-scotland-2021-updated-2023/documents/>

GIRFEC (Getting it right for every child)

- **Means:** Scotland's national approach to wellbeing and multi-agency support (Named Person/Lead Professional, Child's Plan and information-sharing guidance).
- **Requires:** Proportionate assessment and planning; coordinated support; lawful information-sharing; remote delivery should evidence how it supports SHANARRI wellbeing.
- **Our stance:** Remote plans reflect SHANARRI needs and link to any Child's Plan; concerns routed to the Named Person/Lead Professional.
- **Implementation example:** Teacher/tutor logs SHANARRI-aligned adjustments for remote tasks and flags concerns to the Named Person.
- **Links:** <https://www.gov.scot/policies/girfec/>

Self-evaluation frameworks for inspection

- **Means:** HGIOS4 for schools is used for self-evaluation and underpin inspection/improvement dialogue.
- **Requires:** Evidence-based self-evaluation across leadership, learning provision and outcomes; remote practice is considered within these quality indicators.
- **Our stance:** We keep a single self-evaluation evidence set
- **Implementation example:** Termly review uses HGIOS4; challenge questions to test remote provision and impact.



- **Links:** https://education.gov.scot/media/2swjmnbs/frwk2_hgios4.pdf

Data Protection Act 2018 / UK GDPR (all settings)

- **Means:** UK-wide data protection regime for remote platforms, recordings and data sharing in schools and colleges.
- **Requires:** DPIAs, minimisation, secure handling and retention; DPO incident processes.
- **Our stance:** DPIAs for chosen platforms; privacy notices cover remote activity; approved encrypted channels only.
- **Implementation example:** DPIAs and retention references are filed; staff briefed annually on secure remote practice.
- **Links:** <https://www.legislation.gov.uk/ukpga/2018/12/contents>