



Omálearn Teacher-Powered Learning Platform

Safeguarding & Child Protection Policy

Protecting Every Child. Every Session. Every Day.

Effective Date: 1 March 2026 | Version 1.1 | Mandatory – Applies to All Platform Users

This Safeguarding & Child Protection Policy (“the Policy”) sets out Omálearn’s commitment, standards, obligations, and procedures for keeping children safe across all Platform environments — from live teaching sessions to messaging, community interactions, and all digital touchpoints. This Policy is mandatory and applies to every person who engages with the Omálearn Platform in any capacity.

Emergency Safeguarding Contact: If a child is in immediate danger, contact local emergency services first. Then notify Omálearn immediately: safeguarding@omalearn.com | Emergency Hotline: **0800-SAFE-CHILD (0800-7233-2445)** — Monitored 24 hours, 7 days a week.

1. POLICY STATEMENT

Omálearn – an initiative of Metamorph Youth Leadership Institute Ltd/Gte. (“Omálearn”) – is unequivocally committed to the safety, dignity, and wellbeing of every child and young person who uses the Platform. The protection of children is not a secondary consideration; it is the foundation upon which every aspect of the Platform is designed and operated.

Omálearn maintains an absolute zero-tolerance position on child abuse, sexual exploitation, grooming, harassment, bullying, emotional manipulation, financial coercion, digital misconduct, inappropriate communication, and any other conduct that endangers, exploits, or harms a child. There are no exceptions.

This Policy is mandatory and applies to:

- All Teacherpreneurs (independent contractors) engaged through the Platform;
- All Omálearn staff, interns, volunteers, and contractors;
- Parents and legal guardians of Learners;
- Learners using the Platform;
- All third-party service providers who interact with Learner data or content; and
- Any other person accessing the Platform in any capacity.

The welfare of the child is paramount. In all decisions and actions taken under this Policy, the best interests of the child shall be the primary consideration.

2. LEGAL AND REGULATORY FRAMEWORK

This Policy has been developed in accordance with the following legislation, regulations, and international standards. Omálearn is legally obligated to comply with each instrument listed below, and all Platform procedures are designed to meet or exceed these requirements.

2.1 Nigerian Legislation

- **Child Rights Act (CRA) 2003:** The primary federal framework for child protection in Nigeria, establishing the rights of children and obligations of duty-bearers. Where state-level adoptions impose additional duties, Ómálearn shall comply.
- **Violence Against Persons (Prohibition) Act (VAPP) 2015:** Criminalises various forms of violence, including against children.
- **Cybercrimes (Prohibition, Prevention, etc.) Act 2015:** Governs offences relating to online conduct, including cyberbullying and child exploitation through digital means.
- **Nigeria Data Protection Act (NDPA) 2023:** Governs the collection, processing, storage, and transfer of personal data, including the sensitive personal data of children.
- **National Policy on Child Protection (2017):** Establishes the national framework and minimum standards for child protection services.
- **Relevant State Child Rights and Protection Laws:** Ómálearn shall comply with any additional obligations imposed by the laws of the state in which a Learner resides.

2.2 International Standards

- **UN Convention on the Rights of the Child (UNCRC):** Establishes universal rights of children, including protection from abuse, exploitation, and harm.
- **UNICEF Child Safeguarding Guidelines:** International best-practice standards for child protection in digital environments.
- **ITU Child Online Protection Guidelines:** Framework for protecting children in online and digital education contexts.

Where Nigerian law and international standards differ, Ómálearn shall apply the higher standard of protection.

3. DEFINITIONS

The following terms are used throughout this Policy with the meanings set out below:

Term	Definition
Child / Minor	Any person under the age of 18 years, consistent with the Child Rights Act 2003.
Learner	A child or young person aged 10–18 enrolled and using the Ómálearn Platform.
Safeguarding	The range of measures taken to protect children from harm, abuse, neglect, and exploitation, and to promote their welfare.
Child Abuse	Any form of physical, emotional, or sexual abuse, neglect, or exploitation that causes or risks harm to a child.
Grooming	Behaviour by an adult intended to build trust or emotional dependency with a child with the intention of exploitation.
Concern	Any suspicion, allegation, observation, or disclosure that a child may be at risk of or experiencing harm.
Disclosure	A statement made by a child or other person indicating that abuse, harm, or a safeguarding concern has occurred.
Teacherpreneur	An independent educator contracted to deliver teaching services through the Ómálearn Platform.

Designated Safeguarding Lead (DSL)	The trained Ómálearn staff member responsible for coordinating all safeguarding matters and the first point of contact for concerns.
Platform	The Ómálearn website, mobile applications, and all associated digital tools and communication systems.
Session	A scheduled, live online teaching interaction between a Teacherpreneur and a Learner conducted through the Platform.

4. SCOPE OF THIS POLICY

This Policy applies in all contexts and environments in which Ómálearn operates or has influence. Specifically, it covers:

- All live video teaching sessions conducted through the Platform;
- All recorded sessions stored by the Platform;
- All messaging, chat, and communication features on the Platform;
- All community interactions, forums, or group activities hosted by Ómálearn;
- All digital and in-person events organised or co-organised by Ómálearn;
- Conduct arising from Platform introductions, even where it occurs off-Platform;
- All data collection, storage, and processing activities relating to Learners; and
- All third-party integrations, tools, and service providers used to deliver Platform services.

Geographical coverage includes all Teacherpreneurs and Learners within Nigeria (all states and territories), Teacherpreneurs based internationally who serve Nigerian Learners, and any other context where Ómálearn's services are delivered.

5. SAFEGUARDING PRINCIPLES

All safeguarding decisions, actions, and systems at Ómálearn are guided by the following core principles:

5.1 Best Interests of the Child

Every decision made under this Policy shall place the welfare and best interests of the child at the centre. No commercial, operational, or reputational consideration shall override the safety of a child.

5.2 Prevention First

Ómálearn invests in proactive prevention through robust vetting, training, technology, and policy — not just reactive responses to harm. Prevention is always superior to cure.

5.3 Shared Responsibility

Safeguarding is the collective responsibility of every person associated with Ómálearn — not solely the Designated Safeguarding Lead. Every individual has a duty to act on concerns without delay.

5.4 Transparency and Accountability

All concerns must be reported. There are no exceptions to this obligation. Transparency in reporting protects both children and the individuals who raise concerns in good faith.

5.5 Non-Discrimination and Inclusion

Every child is entitled to equal protection regardless of gender, ethnicity, religion, disability, socioeconomic status, or any other characteristic. Safeguarding measures shall not discriminate.

5.6 Confidentiality and Proportionality

Information relating to safeguarding concerns is shared strictly on a need-to-know basis. The right to privacy is balanced against the overriding duty to protect children from harm.

6. ROLES AND RESPONSIBILITIES

The following table sets out the safeguarding responsibilities of each group of stakeholders associated with the Ómálearn Platform:

Stakeholder	Key Safeguarding Responsibilities
Ómálearn (Platform)	Designate and maintain a trained DSL; establish and enforce safeguarding policies; implement technical safety systems; investigate all reports promptly; report concerns to authorities; maintain records securely.
Designated Safeguarding Lead	Receive and triage all safeguarding reports; conduct or coordinate investigations; liaise with law enforcement and child protection agencies; ensure records are maintained; lead training and awareness.
Teacherpreneurs	Complete mandatory safeguarding training; report all concerns immediately; maintain professional boundaries; use only approved communication channels; cooperate fully with investigations.
Parents / Guardians	Provide appropriate supervision; report concerns promptly; ensure safe learning environments; cooperate with Ómálearn investigations; comply with Platform safeguarding requirements.
Learners	Report concerns to a trusted adult or directly to Ómálearn; respect Platform rules; never share personal data with Teacherpreneurs; report any uncomfortable interactions.
Staff & Contractors	Comply with this Policy at all times; complete required training; report concerns to the DSL; cooperate with investigations; maintain confidentiality.

6.1 Designated Safeguarding Lead (DSL)

Ómálearn shall at all times maintain at least one trained and appointed Designated Safeguarding Lead. The DSL is responsible for:

- Being the first point of contact for all safeguarding concerns reported through the Platform;
- Conducting or coordinating investigations into safeguarding concerns;
- Liaising with law enforcement, NAPTIP, the National Child Welfare authority, or other relevant agencies where a referral is necessary;
- Maintaining secure, confidential records of all concerns, investigations, and outcomes;
- Leading safeguarding training, awareness campaigns, and policy reviews;
- Providing regular safeguarding reports to Ómálearn's senior leadership; and
- Ensuring continuity of safeguarding functions through a designated Deputy DSL during periods of absence.

DSL Contact: safeguarding@omalearn.com | Emergency Hotline: 0800-SAFE-CHILD (0800-7233-2445)

7. SAFER RECRUITMENT AND VETTING OF TEACHERPRENEURS

Ómálearn's approach to safer recruitment is the first line of defence in protecting Learners. No Teacherpreneur may deliver sessions to Learners until the following verification and screening requirements have been satisfactorily completed.

7.1 Identity Verification

- Submission of a valid, government-issued photo identification document (National ID Card, International Passport, Driver's Licence, or Voter's Card);
- Biometric or digital identity verification where technically available; and
- Verification of the Teacherpreneur's residential address through supporting documentation.

7.2 Credential Verification

- Submission and verification of all claimed academic certificates and transcripts;
- Confirmation of professional qualifications and teaching licences (e.g. TRCN) where applicable;
- Verification of professional references; and
- Proof of student ID or NYSC certificate for undergraduates or corps members.

7.3 Background Screening and Safeguarding Declaration

- Criminal record checks shall be requested where legally available and technically feasible;
- All Teacherpreneurs must complete and sign a Child Protection Commitment Statement prior to commencing any sessions;
- All Teacherpreneurs must declare any prior criminal convictions, cautions, or investigations involving children or dishonesty;
- Failure to disclose relevant safeguarding history constitutes grounds for immediate and permanent termination; and
- Ómálearn reserves the right to request updated declarations and supporting documentation at any time.

7.4 Mandatory Safeguarding Training Before First Session

No Teacherpreneur may deliver a session to a Learner until they have:

- Completed Ómálearn's mandatory online safeguarding training module;
- Passed the safeguarding assessment with a minimum score of 90%;
- Signed the Safeguarding Pledge set out in Section 14 of this Policy; and
- Confirmed receipt of this Policy in full.

Annual refresher training is mandatory for all Teacherpreneurs. Failure to complete refresher training within the required period will result in temporary suspension of teaching privileges until compliance is confirmed.

8. SAFEGUARDING CODE OF CONDUCT FOR TEACHERPRENEURS

The following standards of conduct are mandatory for all Teacherpreneurs and apply in all interactions with Learners, whether during live sessions, through Platform messaging, or in any other context arising from the Platform relationship.

8.1 Required Conduct

- Maintain clear, appropriate professional boundaries with all Learners at all times;
- Use only Ómálearn-approved communication channels for all interactions with Learners and Parents;

- Never share personal contact details (phone numbers, personal email addresses, social media handles) with Learners or Parents;
- Maintain a professional, respectful, and neutral tone in all communications;
- Dress professionally and present a safe, appropriate teaching environment during all sessions;
- Report any safeguarding concern immediately, including concerns observed about a Learner's home situation;
- Immediately report to Ómálearn any attempt by a Learner or Parent to initiate off-platform contact; and
- Cooperate fully and openly with any safeguarding investigation initiated by Ómálearn.

8.2 Strictly Prohibited Conduct

The following are strictly prohibited and will result in immediate account suspension pending investigation:

- Engaging in romantic, sexual, or suggestive conversation with any Learner;
- Requesting, sending, or encouraging the sharing of personal or intimate photographs;
- Discussing sexual topics or making sexually suggestive comments;
- Offering gifts, money, or incentives to a Learner outside the standard Platform structure;
- Communicating with Learners or Parents via any channel outside the Platform;
- Establishing personal, social, or financial relationships with Learners or their families;
- Accepting friend or follow requests from Learners on any personal social media platform;
- Downloading, screenshotting, or recording images or video of Learners outside the Platform; and
- Sharing, publishing, or distributing any content featuring a Learner without explicit written consent from the Parent and Ómálearn.

9. DIGITAL SAFETY MEASURES AND TECHNICAL CONTROLS

Ómálearn implements a range of proactive technical safeguards to reduce the risk of harm to Learners in the digital environment. These measures are in addition to, and not a substitute for, the conduct standards and human oversight requirements set out in this Policy.

9.1 Session Recording

All live sessions conducted through the Platform are recorded and securely stored. Recordings are retained for a minimum of 24 months and are used for child protection and safeguarding investigations, quality assurance, evidence preservation in the event of a dispute, and training purposes. By using the Platform, all parties consent to session recording for these purposes. Recordings are accessible only by authorised Ómálearn safeguarding and quality assurance staff.

9.2 Monitored Communications

All messages, chat interactions, and communications conducted through the Platform are logged and subject to monitoring. Ómálearn employs automated keyword and pattern detection to flag potentially concerning language or grooming patterns, human review of all flagged communications by trained safeguarding staff, automatic blocking of phone numbers and external platform links shared in chat, and regular audits of communication patterns between Teacherpreneurs and Learners.

9.3 Restricted Communication Architecture

The Platform is designed to prevent off-platform contact. Personal contact details may not be shared through Platform messaging. Links to external communication platforms such as WhatsApp and Telegram are automatically blocked. Any attempt to circumvent Platform communication controls is automatically flagged for safeguarding review.

9.4 AI-Assisted Safety Monitoring

Ómálearn deploys AI-assisted monitoring tools designed to detect inappropriate language or sexual content in sessions or messages, patterns of behaviour consistent with grooming or exploitation, and repeated boundary violations or attempts to move the Learner relationship off-Platform. All AI flags are reviewed by trained human safeguarding staff before any action is taken.

9.5 Parent and Guardian Oversight

Parents and guardians have oversight access to their child's session history and progress records. Parents receive notifications of session bookings, completions, and cancellations, and may request access to session recordings where a safeguarding concern has been raised.

9.6 Data Security

All Learner data, session recordings, and communications are stored using end-to-end encryption on secure servers. Access is restricted to authorised personnel on a strictly need-to-know basis. Ómálearn maintains a data security programme compliant with the NDPA 2023, including regular security audits, penetration testing, and a formal data breach response procedure.

10. RECOGNISING ABUSE AND SAFEGUARDING CONCERN INDICATORS

It is the responsibility of every Teacherpreneur and Ómálearn staff member to be alert to signs that a Learner may be at risk of or experiencing abuse or harm. The following table provides a reference guide. This list is not exhaustive — any concern, however minor it may seem, must be reported.

Type	Behavioural Signs	Online / Platform Indicators
Physical Abuse	Unexplained injuries; reluctance to appear on camera; flinching; implausible explanations for marks.	Frequent absences; visible injuries or distress on camera; sudden withdrawal.
Emotional Abuse	Extreme low self-esteem; fear of making mistakes; regression in performance; excessive people-pleasing.	Heightened anxiety during sessions; excessive self-criticism; inability to focus.
Neglect	Poor hygiene; appearing underfed; fatigue; inadequate clothing.	Chaotic or unsafe environment visible on screen; frequent absences; no adult supervision.
Sexual Abuse	Sexualised language or behaviour inappropriate for age; knowledge of adult sexual behaviours; fear of specific individuals.	Disclosures during sessions; requests for private communication; sharing inappropriate content.
Online / Cyber Abuse	Distress when online activities are mentioned; secretive behaviour; sudden changes after device use.	Sharing personal data unsafely; contact with unknown adults; evidence of cyberbullying.
Exploitation	Unexplained money or gifts; inappropriate relationships with older individuals.	Requests to move communication off-Platform; offers of gifts or money from Teacherpreneurs.

Important: Do not ignore minor or seemingly low-level concerns. A pattern of small concerns may indicate a serious and ongoing safeguarding issue. Every concern must be documented and reported to the DSL without delay.

11. RESPONDING TO A DISCLOSURE BY A LEARNER

If a Learner makes a disclosure — that is, tells you that they have experienced or are at risk of harm — your response in the moment is critically important. Follow these principles:

11.1 Listen

Give the child your full attention. Stay calm and composed. Do not show shock or disbelief.

11.2 Believe

Take what the child says seriously. Do not express doubt or minimise what they are telling you.

11.3 Do Not Probe

Do not ask leading questions or press for more details than the child volunteers. This can contaminate evidence and cause further distress.

11.4 Do Not Promise Confidentiality

Explain gently that you may need to share what they have told you with people who can help, but that only those who need to know will be told.

11.5 Reassure

Tell the child they have done the right thing by telling you. Reassure them that they are not in trouble and that it is not their fault.

11.6 Document

As soon as possible after the disclosure, write down exactly what was said using the child's own words. Record the date, time, and setting. Do not paraphrase or interpret.

11.7 Report

Report to the DSL immediately. Do not discuss the disclosure with anyone other than the DSL and authorised safeguarding staff. Contact details: safeguarding@Qomalearn.com | 0800-SAFE-CHILD.

12. REPORTING AND ESCALATION PROCEDURE

Any person — whether a Teacherpreneur, Parent, Learner, staff member, or member of the public — who has a safeguarding concern relating to a child on the Qomalearn Platform must report it immediately. There is no threshold below which a concern should be withheld. When in doubt, report.

12.1 How to Report

- **Email (monitored 24/7):** safeguarding@Qomalearn.com
- **Emergency Hotline (24/7):** 0800-SAFE-CHILD (0800-7233-2445)
- **Platform Report Feature:** Click the “Report Safeguarding Concern” button available in every session and on every Learner profile page.
- **Anonymous Reporting:** Anonymous reports are accepted and will be investigated. Providing contact details allows the DSL to seek clarification if required.

12.2 What to Include in a Report

Where possible, a report should include: the reporter's name and contact details (if not anonymous); the Learner's name, Platform ID, and age; the date, time, and context of the concern; a factual, objective description of what was observed, heard, or disclosed; any immediate action already taken; and an assessment of the urgency of the situation.

Do not: investigate the concern independently, confront the alleged perpetrator, share information with anyone other than the DSL, or allow the concern to go unreported because of uncertainty about its seriousness.

12.3 Immediate Risk of Harm

If a child is in immediate danger, contact local emergency services (Police: 112 or the relevant state emergency line) immediately. Do not delay contacting emergency services in order to report to Ómálearn first. The child's physical safety is the immediate priority. Once the child is safe, notify Ómálearn's emergency safeguarding hotline: 0800-SAFE-CHILD.

12.4 Mandatory Escalation by Ómálearn

The DSL is obligated to escalate concerns to the relevant external authorities where there is reasonable cause to believe a child is at risk of or has suffered significant harm, where a criminal offence involving a child may have been committed, or where a court order requires disclosure. Relevant authorities include the Nigerian Police Force, NAPTIP, the Federal Ministry of Women Affairs and Social Development, and relevant State Child Welfare Authorities.

13. RESPONSE AND INVESTIGATION PROCEDURE

Upon receipt of a safeguarding concern, the DSL will initiate the following structured response procedure. All steps are documented confidentially in the safeguarding case management system.

#	Action	Description
1	Receive Concern	Any staff member, Teacherpreneur, Parent, or Learner identifies or is told about a safeguarding concern.
2	Do Not Investigate	Do not investigate independently, confront the alleged perpetrator, or promise confidentiality to the child.
3	Report to DSL	Report immediately to the DSL via safeguarding@omalearn.com or the emergency hotline: 0800-SAFE-CHILD.
4	Risk Assessment	DSL conducts an immediate risk assessment to determine whether the child is at immediate risk of harm.
5	Preserve Evidence	Account(s) suspended where appropriate. Session recordings, messages, and data are secured.
6	Notify Authorities	If there is immediate danger or a credible criminal concern, DSL refers the matter to law enforcement or Child Protection Authority.
7	Formal Investigation	DSL conducts a structured internal investigation, documenting all evidence and actions.
8	Outcome & Action	Appropriate disciplinary action taken. Affected parties notified within legal and confidentiality constraints.

9	Support	Pastoral and/or professional support offered to the affected Learner and family.
10	Review	Policy and procedures reviewed where the concern reveals a gap or improvement opportunity.

13.1 Timeframes

- **Acknowledgement of report:** Within 4 hours of receipt.
- **Initial risk assessment:** Within 24 hours of acknowledgement.
- **Interim decision (suspend/continue):** Same day as risk assessment.
- **Full investigation:** Typically completed within 7 working days. Complex cases may take longer.
- **Outcome communicated:** Within 3 working days of investigation conclusion.

13.2 Confidentiality During Investigation

All safeguarding investigations are conducted strictly confidentially. The identity of the person who made the report is protected to the maximum extent possible. The alleged perpetrator is not notified of the specific details of the concern before the investigation is complete, except where required by law. The Learner's family is kept appropriately informed of protective actions being taken, within the constraints of the investigation.

14. SAFEGUARDING PLEDGE

All Teacherpreneurs must sign and return this Pledge before delivering any session to a Learner. It forms part of the Teacherpreneur Terms of Service and must be renewed annually.

"I solemnly commit to: acting at all times in the best interests of every child I teach; creating safe, respectful, and inclusive learning environments; reporting any safeguarding concern immediately, honestly, and without hesitation; upholding strict professional boundaries in all interactions with Learners and their families; never engaging in any behaviour that could cause harm, distress, or exploitation to a child; maintaining confidentiality appropriately and in accordance with this Policy; cooperating fully, openly, and honestly with any safeguarding investigation; and continuously learning and improving my understanding of child protection."

Teacherpreneur's Full Name: _____

Signature: _____ Date: _____

15. PARENT AND GUARDIAN RESPONSIBILITIES

Parents and legal guardians play a vital and irreplaceable role in safeguarding their children on the Qmálearn Platform. By registering a Learner account, Parents accept the following responsibilities.

15.1 Required Actions

- Provide appropriate supervision for younger Learners during sessions, particularly those aged 10–13 years;

- Ensure the Learner has access to a safe, private, and appropriate physical environment for online learning;
- Monitor the Learner's participation, engagement, and wellbeing before and after sessions;
- Report any safeguarding concern or unusual behaviour to Ómálearn promptly and without waiting for certainty;
- Comply with all Platform safeguarding policies, including the prohibition on off-platform arrangements;
- Cooperate fully and honestly with any safeguarding investigation initiated by Ómálearn; and
- Discuss online safety with the Learner and reinforce the importance of not sharing personal information.

15.2 Prohibited Conduct

- Encouraging or facilitating private tutoring arrangements with Teacherpreneurs outside Platform safeguards;
- Sharing a Teacherpreneur's personal contact details with the Learner or third parties;
- Facilitating unsupervised, unmonitored communication between the Learner and any Teacherpreneur;
- Harassing, threatening, or behaving abusively towards Teacherpreneurs; and
- Providing false information about a Learner's age or identity.

Where a Parent's conduct is found to be putting a Learner at risk, Ómálearn may take protective action including suspension of the account and notification of relevant authorities.

16. WHISTLEBLOWER PROTECTION

Ómálearn is firmly committed to creating an environment in which safeguarding concerns can be raised freely and without fear. The following protections apply to all individuals who report concerns in good faith:

- No person who reports a safeguarding concern in good faith shall face retaliation, discrimination, account suspension, reduced earnings, or any other negative consequence as a result of making that report;
- The identity of a person who raises a concern will be protected to the maximum extent possible within the constraints of the investigation;
- Anonymous reporting is available and all anonymous reports will be investigated;
- Any person who experiences retaliation for raising a safeguarding concern should report this immediately to the DSL or to the CEO directly at ceo@Ómálearn.com; and
- Ómálearn will take appropriate disciplinary action against any individual found to have retaliated against a good-faith reporter.

False or malicious reports: Any person found to have made a deliberately false or malicious safeguarding report will be subject to disciplinary action, which may include account termination and referral to relevant authorities.

17. DISCIPLINARY ACTION AND SANCTIONS

Where a safeguarding concern is confirmed following investigation, Ómálearn will take firm and proportionate action. Safeguarding violations override all contractual protections. The following sanctions may be applied:

17.1 Formal Warning

For minor breaches of the Code of Conduct, such as a first instance of using informal communication or a one-time lapse in professional presentation. Documented and placed on file.

17.2 Suspension

For moderate breaches, including repeated minor violations, sharing inappropriate content, or failing to comply with communication protocols. Account suspended pending investigation.

17.3 Permanent Ban, Withheld Payments, and Legal Action

For serious or zero-tolerance violations including grooming, sexual misconduct, abuse, fraud, intentional data breaches, or repeated serious violations. Consequences include permanent removal from the Platform, forfeiture of outstanding earnings, and referral to law enforcement and child protection authorities.

In all cases, Qmálearn reserves the right to issue formal warnings; suspend accounts immediately pending investigation; permanently ban users from the Platform; withhold outstanding payments where misconduct involves financial dishonesty; report the matter to the Nigerian Police Force, NAPTIP, or other relevant authorities; and pursue civil or criminal legal action to recover damages.

18. DATA PROTECTION AND CONFIDENTIALITY

The processing of personal data in the context of safeguarding is subject to the Nigeria Data Protection Act 2023 (NDPA 2023) and Qmálearn's Privacy Policy. The following standards apply specifically to safeguarding data:

- All safeguarding records, case notes, investigation documents, and related data are strictly confidential and stored in a secure, access-controlled system;
- Access to safeguarding records is limited to the DSL, Deputy DSL, and authorised safeguarding officers on a strict need-to-know basis;
- Safeguarding records relating to a specific concern will be retained for a minimum of 10 years from the date the concern was recorded, regardless of outcome;
- The right to erasure under the NDPA 2023 does not apply to safeguarding records where retention is required to protect the interests of a child or to comply with legal obligations; and
- Any suspected data breach involving Learner data must be reported to the DSL immediately. The DSL will notify the Nigeria Data Protection Commission (NDPC) in accordance with mandatory breach notification requirements.

For queries regarding personal data, contact: privacy@Qmálearn.com.

19. TRAINING AND AWARENESS

Qmálearn is committed to ensuring that all individuals associated with the Platform have the knowledge, skills, and confidence to fulfil their safeguarding responsibilities.

19.1 Mandatory Training – Teacherpreneurs

- Completion of Qmálearn's online safeguarding training module before the first session (minimum pass score: 90%);
- Annual safeguarding refresher training;
- Immediate additional training required following a policy update or personal involvement in a safeguarding concern; and

- Subject-specific training where working with particularly vulnerable Learner groups.

19.2 Mandatory Training – Ómálearn Staff

- All staff must complete safeguarding training as part of induction, before commencing any role involving Learner contact or data;
- The DSL and Deputy DSL must hold a recognised, current safeguarding qualification at an appropriate level;
- All staff must complete annual refresher training; and
- Senior leadership must receive regular safeguarding briefings to ensure governance-level awareness.

19.3 Parent Awareness

- Ómálearn provides online safety guidance and resources to all registered Parents as part of the onboarding process;
- Parents receive regular communications regarding safeguarding updates and digital safety tips; and
- A dedicated safeguarding FAQ is available on the Platform for Parents.

19.4 Training Records

Ómálearn maintains records of all safeguarding training completed by Teacherpreneurs and staff. These records are reviewed as part of the annual safeguarding audit and are available to relevant authorities upon request.

20. RELATED POLICIES AND DOCUMENTS

This Policy should be read alongside and is supported by the following Ómálearn policies and documents:

- Parent & Learner Terms of Service;
- Teacherpreneur Terms of Service;
- Privacy Policy and Data Protection Statement;
- Anti-Bullying and Online Safety Policy;
- Complaints and Grievance Procedure;
- Disciplinary and Dismissal Procedure (Teacherpreneurs);
- Platform Technical Security Policy;
- Incident Response and Data Breach Procedure; and
- Teacherpreneur Handbook.

21. POLICY REVIEW AND CONTINUOUS IMPROVEMENT

This Policy is a living document. Ómálearn is committed to continuously improving its safeguarding systems, procedures, and culture in response to experience, evidence, and changing circumstances.

21.1 Scheduled Review

This Policy will be reviewed in full at least once every 12 months. The review will be led by the DSL and will consider any safeguarding concerns or incidents during the review period and the lessons learned, changes to Nigerian legislation or international safeguarding standards, feedback from Teacherpreneurs, Parents, and Learners, new or emerging risks in the digital education environment, and recommendations from any external safeguarding review or audit.

21.2 Unscheduled Review

An unscheduled review shall be initiated immediately where a serious safeguarding incident occurs or is disclosed, a significant change in child protection legislation takes effect, an external body identifies a material gap in Ómálearn’s safeguarding arrangements, or a pattern of concerns suggests a systemic safeguarding risk.

21.3 Version Control

Each reviewed and updated version of this Policy will be clearly dated and numbered. Previous versions are archived and available upon request. All users are notified of material policy changes through email and Platform announcement. Continued use of the Platform constitutes acceptance of the current version.

22. POLICY ACCEPTANCE AND ACKNOWLEDGEMENT

This Policy is mandatory. By using, operating on, or engaging with the Ómálearn Platform in any capacity, all parties acknowledge and confirm the following:

- Safeguarding is a mandatory, non-negotiable obligation that applies to every person associated with the Platform;
- All safeguarding concerns, no matter how minor they may appear, must be reported without delay;
- Session recordings, communications, and Platform activity may be used as evidence in safeguarding investigations;
- Full cooperation with any safeguarding investigation initiated by Ómálearn or relevant authorities is required;
- Violation of this Policy may result in account suspension, permanent ban, withheld payments, and referral to law enforcement; and
- This Policy will be updated from time to time and continued use of the Platform constitutes acceptance of the current version.

DOCUMENT CONTROL INFORMATION

Attribute	Details
Document Title	Ómálearn Safeguarding & Child Protection Policy
Version	1.1
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Next Review Date	1 March 2027
Document Owner	Designated Safeguarding Lead, Ómálearn
Approved By	Advisory Council, Ómálearn
Date Approved	March 2026
Classification	Policy – Mandatory Compliance
Distribution	All Staff, Teacherpreneurs, Contractors, and Platform Users

SAFEGUARDING CONTACTS

Emergency Hotline: 0800-SAFE-CHILD (0800-7233-2445) — Available 24 Hours, 7 Days a Week

Safeguarding: safeguarding@omalearn.com | Privacy: privacy@omalearn.com
General Enquiries: info@omalearn.com | Website: www.omalearn.com

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