Springpod®

SPR149 Springpod Content Warning Policy v1 Aug 2022

1. Purpose

The purpose of this policy is to establish a consistent approach for the provision of content warnings to ensure the provision of a safe and inclusive experience for users, to provide an overview of the range of topics which may require a content warning, to explain what content warnings are and provide guidance on how a content warning can be given and other considerations, and to clarify the value of content warnings and how they contribute to inclusive experiences.

Discussion of difficult subjects can be a key element of enabling students to develop their critical thinking and knowledge of issues and debates. However, a lack of warning before difficult or distressing content can cause distress to students and result in them disengaging from the subject, particularly because of experiences they may have had in their past.
It is impossible to consider all topics that may act as a trigger for someone, however broad acknowledgements provided to students will help to build trust and understanding that their best interests are being taken into account.

2. Scope

This policy applies to the Education Hub Group Ltd, including all employees, contractors, volunteers, visitors, and other workers.

3. Risk Appetite

We have no appetite for impact on our business resulting from a lack of content warnings.
We also have no appetite for impact on users or third parties caused by a lack of content warnings.

4. Statement

Definitions

A content warning is a verbal, visual or written warning given prior to exposure to material which some may find disturbing, distressing or that may evoke a strong emotional response.

Content warnings should be used to describe something that might upset readers and make them feel bad e.g., blood and nudity.

Trigger warnings should be used to prevent exposing someone with past trauma, to something that might insight a physical and/pr mental reaction e.g., sexual violence.

Examples of the sort of content which should receive a content warning include:
• Sexual Assault
• Abuse
• Child abuse/paedophilia/incest
• Animal cruelty or animal death
• Self-harm and suicide
• Eating disorders, body hatred, and fat phobia
• Violence
• Pornographic content
• Kidnapping and abduction
• Death or dying
• Miscarriages/Abortion
• Blood
• Mental illness, addiction and ableism
• Racism and racial slurs
• Sexism and misogyny

- Hateful language directed at religious groups (e.g., Islamophobia, antisemitism)
- Transphobia and trans misogyny
- Homophobia and heterosexism
- Stalking
- Explicit images

Application
Content warnings are a part of everyday life. They are given prior to watching television, a film at the cinema, on content included on streaming services such as Netflix, on the radio and television. Signposts to support services are often flagged after a sensitive topic has been discussed and, on social media, content warnings are often given by users or by a social media platform themselves.

Springpod's approach to Content Warnings
A content warning should be given at least once. Examples of how this can be done include:
- Written warning at the beginning of a video
- Slide at beginning of presentation
- Email prior to a session
- Verbal warning at beginning of session or in a previous session
- Content warnings attached to reading lists
- Dedicated document available to students with relevant warnings included

Written warnings
Start with the abbreviation: **CW** *or* **TW**
Add the two slashes: **CW** *// or* **TW** *//*
Add the keywords clearly, without censoring (make these clear enough so people know what to expect, but without being too descriptive that it itself can trigger a reaction).
For example**: CW // explicit images** *or* **TW // sexual violence**

In conversation
When you are in a conversation and know you will be saying something sensitive….
Say that you are giving a trigger warning.
Clearly mention the themes you will be touching on.
Leave enough time for someone to opt-out.

Giving a content warning is not always possible due to the nature of academic discussion. Should topics which are distressing to a student arise unexpectedly, for example in-group discussion, their ability to leave a session for either a brief period or the entire session should also apply.

Regardless of how the content warning is given, the aim is for students to know what to expect and they have agency to act in their own best interest.

5. Compliance
Compliance with this Policy will be audited through various methods, including periodic training, video monitoring, business reports, internal and external audits, and feedback to the policy owner.
An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

6. Exceptions
Any exception to the policy must be approved by the Head of Operations (HOO) in advance either by consultation or by delegated authority following the risk management framework.

7. Roles and Responsibilities
The first line of defence (everyone) is responsible for:
• Ensuring their day-to-day business activity falls in line with this policy.
• Ensuring their business area is compliant with this policy.

• Reporting any actual or perceived breaches.

The Second line of defence (the management) is responsible for:
• Oversight of policy implementation.
• Acting as an independent, effective challenger of the first line.

The third line of defence (Risk & Compliance Officer) is responsible for:
• Assuring that the policy meets all regulatory requirements, and that the policy is being complied with effectively.
• Reviewing and approving this policy.
• Developing and supplying training on this policy and associated standards, tools, methodologies, and programmes.
• Supplying advice and guidance to staff implementing the policy.

The CEO / COO are responsible for:
• Approval of this Policy

8. Document Review
This document will be reviewed at least annually or as needed if significant changes occur in the business structure, responsibilities, or regulatory framework.

9. Document Version History

Date	Author	Version	Notes
Aug 2022	**Kieran Morgan-McGeehan** Head of Operations	1	Initial Policy