



natterhub

how we are aligned to the legislation

Social media is now an entrenched facet of our children's lives and although it provides many benefits such as connectivity and education, it carries many risks, and these frequently have damaging and even fatal outcomes. The recent surge of documents released by legislative bodies is highlighting the need for urgent action from schools and government to raise the profile of digital literacy education and e-safety in schools.

Natterhub is a digital framework for Primary Schools. It has been designed to cover all aspects of digital literacy, online citizenship and e-safety. Using an experiential learning approach, children have the opportunity to become savvy, discerning and sceptical online citizens. In this document, we will set out to depict how we are aligned to the most recently released documentation.

Text in italics denotes extracts taken from referred documents.



Department for Education

Teaching online safety in school

June 2019

Guidance supporting schools to teach their pupils how to stay safe online, within new and existing school subjects. This advice brings together information that will help schools deliver online safety content within their curriculum and embed this within their wider school approach. (4)

Natterhub positively encourages use of the platform for all subjects, with digital literacy and online safety lessons taught weekly. If used throughout the school, children will have the opportunity to take part in age appropriate lessons in each year group, and be part of their school community.

...covers the principles of online safety at all key stages, with progression in the content to reflect the different and escalating risks that pupils face. (5)

Children will encounter varying obstacles online as they grow. Natterhub's content is age appropriate and will continuously develop to address changing online behaviours and trends.

Underpinning knowledge and behaviours

20. It is... important to focus on the underpinning knowledge and behaviours that can help pupils to navigate the online world safely and confidently regardless of the device, platform or app.

We believe that children deserve an education which prepares them for life beyond school. Our objectives, lessons and resources are all aimed to provide pupils with online navigational tools and digital communication skills, regardless of device, platform or app.

21. Underpinning knowledge and behaviours include:

- *How to evaluate what they see online – This will enable pupils to make judgements about what they see online and not automatically assume that what they see is true, valid or acceptable.*
- *How to recognise the techniques used for persuasion – This will enable pupils to recognise the techniques that are often used to persuade or manipulate others. Understanding that a strong grasp of knowledge across many areas makes people less vulnerable to these techniques and better equipped to recognise and respond appropriately to strongly biased intent or malicious activity.*
- *Online behaviour – This will enable pupils to understand what acceptable and unacceptable online behaviour looks like. Schools should teach pupils that the same standard of behaviour and honesty apply on and offline, including the importance of respect for others. Schools should also teach pupils to recognise unacceptable behaviour in others.*
- *How to identify online risks – This will enable pupils to identify possible online risks and make informed decisions about how to act. This should not be about providing a list of what not to do online. The focus should be to help pupils assess a situation, think through the consequences of acting in different ways and decide on the best course of action.*
- *How and when to seek support – This will enable pupils to understand safe ways in which to seek support if they are concerned or upset by something they have seen online. (6-8)*

The above statements underpin the writing and design of Natterhub. It has been built to cover all of the above, and more.

22. Understanding and applying the knowledge and behaviours above will provide pupils with a solid foundation to navigate the online world in an effective and safe way. However, schools also need an understanding of the risks that exist online so they can tailor their teaching and support to the specific need of their pupils. (8)

Natterhub addresses online and screen behaviour issues in child-friendly, age appropriate lessons which are supported by competent teacher notes. These have been designed with whole class teaching in mind, and are suited to adapting to suit varying needs. We also have a proficient set of FAQs on our website, along with efficient customer support and informative blogs. These are all sources of support and advice.

24. Throughout the following sections...age specific advice about the online knowledge and skills that pupils should have the opportunity to develop at different stages of their lives, including how to navigate online safety.

How to navigate the internet and manage information

25. The section covers various technical aspects of the internet that could leave pupils vulnerable if not understood.

- Managing online information
- Copyright and ownership
- Privacy and security

How to stay safe online

27. This section covers elements of online activity that could adversely affect a pupil's personal safety or the personal safety of others online.

- Online relationships
- Privacy and security
- Online reputation
- Online bullying

Wellbeing

29. This section covers the elements of online activity that can adversely affect a pupil's wellbeing.

- Self-image and identity
- Online reputation
- Online bullying
- Health, wellbeing and lifestyle

Natterhub's 'Badges of Honour' system allows pupils to identify achievements in learning online safety skills, and also where they may need some more time to develop their know-how. This system allows teachers to track and record progress, and plan for further teaching.

The above list has been considered in creating a comprehensive portfolio of Natterhub lessons to prepare children to thrive online.

38. It is important to create a safe environment in which pupils feel comfortable to say what they feel.

Using education surrounding digital literacy and online relationships, Natterhub is providing a safe environment in which children are encouraged to appropriately express themselves through posts, comments and behaviours.

41. Whole-school approaches are likely to make teaching more effective than lessons alone. A whole school approach is one that goes beyond teaching to include all aspects of school life, including culture, ethos, environment and partnerships with families and the community.

Natterhub has been created with children from Year 1 to Year 6 in mind, which means a whole-school approach can be easily adopted. Children will feel a sense of community and connection, with Natterhub at the centre of sharing achievements, events and evidence of school culture.



Department for Education Realising the Potential of Technology in Education April 2019

Foreword:

using technology for a purpose: to drive student engagement and attainment and to support effective working environments

It can be hard for leaders to understand how technology can support positive change and teachers are often told to just 'find a way to integrate technology or devices in the classroom'. It can be difficult for education leaders to separate evidence-based practice and products from a vast range of gimmicks.

Natterhub takes an experiential learning approach. It has been modelled on real life interactions with social media which ensures a low barrier to entry for teachers and maximum experience for pupils. We are not a gimmick because we have trialled, tested and researched our product. We are an educational version of what is already used by billions of people around the world. Natterhub is a safe, social media which teaches children about being online.

1. Setting our vision for Education Technology

EdTech is not a silver bullet. In the 21st century, it should be seen as an inseparable thread woven throughout the process of teaching and learning. It is senseless to pretend it isn't something that every teacher and every learner uses, every day.

46% of 5-15-year olds have their own smartphone, and 49% have their own tablet. Yet the use of technology in education is highly variable and is rarely fully integrated (4)

The need for greater digital capability and skills including: The skills and confidence to use technology effectively. (9)

Social media is the go-to platform to showcase everything we do in society. This is why we have designed Natterhub to mimic real life experiences to ensure that children are learning and applying their knowledge and skills. This is a proven, effective teaching and learning pedagogy.

2. Securing the digital infrastructure

Securing high speed internet connectivity opens opportunities for education providers to move to cloud-based services and storage. Cloud technology allows information and services to be stored, maintained and managed remotely through the internet rather than on a local hard drive or an on-site server. (27)

Natterhub is a cloud-based SAAS service.

3. Developing digital capabilities and skills

Technology works best in education when strategically introduced by skilled, and confident staff. We know however that many leaders can struggle to know where to start with technology; they may be experts in education but are often not experts in digital technology. The same is true for teachers – we know that confidence and willingness are among the main barriers to adopting digital technologies.. (30)

Natterhub has a bottom up approach allowing for one user in a school to trial a class number of licenses. This key early adopter will be a social media user outside of school and will be able to

disseminate information to colleagues and become the Natterhub 'skilled user' to champion the concept to the rest of the staff.

4. Supporting effective procurement
5. Promoting digital safety

Many are rightly concerned about the privacy, security and safety implications that come with adopting technology (45)

Schools, colleges, universities and other providers are directly responsible for their own security and data protection and need to ensure they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners. (46)

should also be doing all that they reasonably can to limit children's exposure to potentially harmful material by ensuring appropriate filters (51)

schools and colleges should consider a whole school approach to online safety. In addition to monitoring and filtering, this should include ensuring that children are taught about online safety as part of a broad and balanced age-appropriate curriculum (52)

EdTech suppliers should adhere to the Cyber Essentials minimum standards developed by the National Cyber Security Centre as well as the guidelines developed within the government's Code of Practice for Consumer IoT Security to ensure that any products connected to the internet are secure by design (53)

Natterhub has secured a partner with a leading ed-tech company who is offering world class, front line, web security. They have 4.5 million users with a proven nine-year track record and currently working with 91% of all the primary schools in UK and 179 countries around the world.

6. Developing a dynamic EdTech business
7. Supporting innovation through EdTech challenges
8. Improving the DfE's digital services
9. Conclusion – implementing, integrating and innovating

technology has the potential to transform educational experiences (87)

ambition within the education community and EdTech industry to develop plans which can revolutionise our approach to technology. This strategy marks the start of creating a technology revolution in education in England, which must be delivered in partnership with education and industry (88)

Natterhub has the potential to dramatically change the way we interact with mobile devices in the primary classroom. Hindered by a lack of framework and unwieldy storage options, until now, pupils and teachers have been limited to questionable app content for the sake of using technology in the classroom.

Natterhub will address the disparity that currently exists between the tech skills used outside school and the limited experiences inside the classroom.

For the first time, children will be able to maximise their opportunities to self-manage their files, share their work, interact digitally with peers and have access to social media style e-safety lessons. Natterhub also offers possibilities to develop digital literacy skills, using the camera and video function which will maximise the benefits of peer on peer learning.



HM Government Online Harms White Paper April 2019

*8: Technology as part of the solution
the tech sector can equip all companies and users with better tools to tackle online harms. We want the UK to be a world-leader in the development of online safety technology (8.1)*

Natterhub is a scalable, globally reaching company. The platform has been populated with high quality, age-appropriate online safety lessons which are relevant to all children with access to the internet around the world.

it is commonplace for design to encourage addictive behaviour rather than wellbeing, or for collecting user-data to be prioritised over privacy. This results in an unacceptable burden on users to manage their online safety without sufficient support from the companies that they rely on. This is a particular concern for vulnerable users. (8.13)

Functionality has been carefully developed with time management in mind. Natterhub has a timer function and teachers can set this to the appropriate length of time for their pupils. Discussions around time management and screens are woven throughout the lessons so that children develop an acute awareness of the issues surrounding screen time.

- **BOX 31**
- These require the Information Commissioner to produce an 'age- appropriate design code of practice',
- the need to implement high privacy settings by default
- and use language that is clear and easy to understand for youngsters at different stages of their development

At the time of writing, the Information Commissioner has released the proposals for the age-appropriate design code of practice and Natterhub complies with all of the suggestions made.
*See section on Age Appropriate Design Code.

9: Empowering Users

- Users want to be empowered to manage their online safety, and that of their children, but there is insufficient support in place and they currently feel vulnerable online.
- Government has taken steps to address digital literacy in the relevant areas of the school curriculum.
- The Government will develop a new online media literacy strategy, through broad consultation with stakeholders.

All users, children and adults, should be empowered to understand and manage risks so that they can stay safe online. The government is ensuring that children get high quality education at school to develop their digital literacy. Adult users should ... support children in their care. In this rapidly changing environment, it can take time to learn how to evaluate what is and is not risky, and to acquire the skills to avoid harm. (9.1)

Education must be at the heart of all e-safety learning. Age-appropriate online knowledge will form an integral part of the primary curriculum and Natterhub offers children the safe 'sandbox environment' where they can explore and apply digital literacy.

Due to the rapidly changing environment, Natterhub will continue to be developed using an agile approach to ensure that it remains relevant and adaptive to real world issues.

The technical complexity and pace of innovation of the online world means that there is a constant need to improve the tools available to users so that they are able to manage and address risks online. A number of recent independent reports have also highlighted the specific need for improved digital literacy, including the DCMS Select Committee's report into

disinformation and the Cairncross report on *A sustainable future for journalism*. Children have also told us that they want more education about online safety, as well as more support from tech companies to keep them safe (9.2) Natterhub lessons address the potential pitfalls of social media alongside the benefits and demonstrates to children how they can enjoy and learn from using a social media environment to curate their achievements in an educational setting.

- **BOX 34**
- Two thirds of children aged 12 and under (67%) and nearly half of 13 to 18-year olds (46%) would welcome more education in schools about online safety.
- Children have low expectations of social media platforms in relation to their privacy, safety and security online and would like to be better protected against abusive content.

Natterhub's sister company, The Pedagogos, has a proven track record in the educational sector. Now, with the joint venture of another trusted educational brand, Natterhub can reassure users that the quality of their online safety instruction will be of the highest calibre.

DfE continues to incorporate online safety into the school curriculum, to help children and young people understand healthy relationships online, and to improve their digital literacy to equip them to manage the different and escalating risks that young people face. (9.4)

As part of this, DfE is making Relationships Education compulsory for all primary pupils, Relationships and Sex Education compulsory for all secondary pupils and Health Education compulsory for all pupils in all primary and secondary state-funded schools in England. The Department recently consulted⁷⁷ on draft guidance for these subjects which includes teaching about respectful relationships, including online, as well as health and mental wellbeing. This will include:

- *How to stay safe online.*
- *Critically considering information and how people present themselves online.*
- *Rights and responsibilities.*
- *How data is gathered, shared and used.*
- *The benefits of rationing time spent online. (9.5)*

Having Natterhub as the vehicle to deliver the suggestions made by the DfE ensures the impact of the lessons are effective. We use a practical, experiential approach to ensure that the lessons have the potential to reach the greatest number of children. Currently, didactic, 'chalk-and-talk' lessons are distributing knowledge but not enabling children to apply it in a simulated 'real-life' setting.

In the government response to the above consultation, we also set out that we intend to produce supporting information for schools on how to teach about all aspects of internet safety, not just those relating to relationships, sex and health, to help schools deliver this in a coordinated and coherent way across their curriculum. (9.6)

Natterhub has been designed to be coherently integrated into any curricular area. Although the lessons can be used exclusively during PSHE and RSE lessons, the functionality of the platform allows children to use it as a digital communication tool, as a showcase for academic achievements, as a space to share interest in hobbies or as a virtual exercise book. In simple terms, it is a safe space for children to use technology in the way it is used in the real world, a silver thread woven through our lives.

Schools will be encouraged to teach the new subjects from September 2019 – many of them are already doing this and will be able to adapt to the new guidance quite quickly. The requirement to teach the new subjects will then follow from September 2020. (9.7)

Natterhub is set to launch in September 2019, ready for the conscientious early adopters and will be readily embedded into schools by September 2020.

e-safety at all key stages, with progression in the content to reflect the different and escalating risks that young people face. This includes how to use technology safely, responsibly, respectfully and securely, how to keep personal information private, and where to go for help and support (9.8)

- **Box 35**
- *Online safety initiatives: Education for a Connected World*
- *The UK Council for Internet Safety's (UKCIS) Education for a Connected World framework describes the digital knowledge and skills that children and young people should have the opportunity to develop at different ages and stages of their lives.*
- *Designed to help educators engage in a meaningful dialogue with their students about their lives online, the tool covers a wide range of issues, including self-image and identity, privacy and security, online relationships and online bullying.*

Natterhub lessons are a progressive, spiral, scheme of work. They can be used as a linear progression by schools or as a 'dip-in' program of study to suit the needs of the class. Natterhub can be used within any specific curriculum and are relating to global issues faced by any child using the internet. Natterhub lessons have been drawn up melding the suggestions from the RSE proposals and the UKCIS document as well as other key institutions working within the online safety sector.

The need for greater online media and digital literacy

Online media and digital literacy can equip users with the skills they need to spot dangers online, critically appraise information and take steps to keep themselves and others safe online. It can also have wider benefits, including for the functioning of democracy by giving users a better understanding of online content and enabling them to distinguish between facts and opinions online. In recent months, there have been several reports that recognise the importance of online media and digital literacy, calling for action at all levels. Box 37 summarises the recommendations of some of these reports. (9.12)

- **Box 37**
- *Stakeholder calls for action to improve media and digital literacy*
- *The House of Commons DCMS Select Committee has called for digital literacy to be the fourth pillar of education, alongside reading, writing and maths in its report *Disinformation and 'Fake News'*. The Committee also noted the role of Ofcom, the ICO, the Electoral Commission and the Advertising Standards Authority in promoting digital literacy and recommended that the government ensures that the four main regulators produce a more united strategy in relation to digital literacy.*
- *In 2018, the House of Lords Select Committee on Political Polling and Digital Media stressed the need to teach critical literacy skills in schools to limit the spread of misinformation online and its potential impact on democratic debate.*
- *The Children's Commissioner's report *Growing up Digital*, published in 2017, called for the creation of a compulsory digital citizenship programme for pupils aged 4 to 14, to improve children's digital literacy skills and digital resilience and to **broaden digital literacy education beyond safety messages.***

The power of Natterhub lies in its ability to effectively teach online media and digital literacy. Using an experiential approach under the guidance of the class teacher, children have the opportunity to become savvy, sceptical online users. We are working with a range of content providers to provide children with high quality news streams. Children will be asked to spot 'fake news' and understand the need to discern fact from opinion. **Natterhub is currently the only tool that allows children to broaden their digital literacy education beyond safety messages.**



Department for Education Relationships Education, Relationships and Sex Education (RSE) and Health Education February 2019

The impact of time spent online, the positive aspects of online support and negotiating social media, including online forums and gaming, should also be included. Teachers should understand

that pupils who have experienced problems at home may depend more on schools for support. (102)

The national curriculum for computing aims to ensure that all pupils can understand and apply the fundamental principles and concepts of computer science, including logic, algorithms and data representation. It also covers e-safety, with progression in the content to reflect the different and escalating risks that young people face as they get older. This includes how to use technology safely, responsibly, respectfully and securely, how to keep personal information private, and where to go for help and support. (107)



UKCCIS

Education for a connected world February 2018

It focuses specifically on eight different aspects of online education:

- 1. Self-image and Identity*
- 2. Online relationships*
- 3. Online reputation*
- 4. Online bullying*
- 5. Managing online information*
- 6. Health, wellbeing and lifestyle*
- 7. Privacy and security*
- 8. Copyright and ownership*

These two documents greatly underpin both the concept and the content (substance and pedagogy) of Natterhub. The timing of the PSHE and RSE curriculum being made compulsory has been a start-up bonus but the ethos of Natterhub and the sister company, The Pedagogos has long believed that PSHE ought to be at the heart of the curriculum. Outstanding PSHE education builds grit and resilience and now that our children are exposed to a new facet of society, that of online living, never has there been more need to equip our children with hardiness and tenacity to face the future that lies ahead.

The Natterhub team have developed a Badges of Honour system that will enable children to see the progress they are making as they work through the scheme of work from Year 1- Year 6. All of our lessons (one lesson per week, per year group) are aligned to our badge system so that it is clear for teachers to track and assess children according to these characteristics of learning. Parents will also be able to monitor their children's learning via the parent app. This will enable parents to recognise when their child might be ready for their own mobile device.

Our lessons cover all the proposals made in the RSE associated with e-safety and each learning objective as highlighted in the UKCIS document, Education for a Connected World. Each of the eight aspects of learning have been covered by the content created in our system. The lessons are delivered via the framework, in 'Lesson Mode' where the teacher has full control of the platform.

The lessons engage the children in discussions, activities (both online and offline) and challenges. As part of the lesson and following the lesson, the children have the chance to take quizzes and take part in polls which sends useful data to the teacher about their understanding and based on their achievements, the teacher can award the badges to the pupil profile. As pupils work their way up

the Badges of Honour system, the Natterhub platform will offer a greater amount of autonomy, once they have earned the right to do so.

Depending on the hardware available in schools, children have the opportunity to respond via the platform or as part of a group. Whichever option the class has available to them, the children are learning about being a digital citizen, whilst being *in* a digital environment.

This experience offers children the most impactful way of learning about social media and being online. The Natterhub platform will provide useful data, information, insights and conclusions which we will report to government bodies for important discussion and decision making.

A good analogy to use is this; Natterhub takes children to the pool, to teach them how to swim.



Information Commissioner's Office

Age Appropriate Design: A Code of Practice for Online Services

April 15th, 2019

Summary of code standards

This code contains practical guidance on 16 standards of age-appropriate design for information society services likely to be accessed by children:

1. *Best interests of the child: The best interests of the child should be a primary consideration when you design and develop online services likely to be accessed by a child.*

Natterhub has been designed and developed after five years of research. The team have analysed educational documents, online safety legislation and built on over 25 years of classroom practice and in discussion with more than 5000 teachers, children and parents.

2. *Age-appropriate application: Consider the age range of your audience and the needs of children of different ages. Apply the standards in this code to all users, unless you have robust age-verification mechanisms to distinguish adults from children.*

Natterhub is accessible only by schools and the pupils within the school, protected and gated by the IP address and the firewalls used by the institution.

3. *Transparency: The privacy information you provide to users, and other published terms, policies and community standards, must be concise, prominent and in clear language suited to the age of the child. Provide additional specific 'bite-sized' explanations about how you use personal data at the point that use is activated.*

Natterhub is clear that all content belongs to and stays within the school.

4. *Detrimental use of data: Do not use children's personal data in ways that have been shown to be detrimental to their wellbeing, or that go against industry codes of practice, other regulatory provisions or Government advice.*

All activity on Natterhub is overseen by the class teacher and can be viewed at any time by the headteacher or lead administrator.

5. *Policies and community standards: Uphold your own published terms, policies and community standards (including but not limited to privacy policies, age restriction, behaviour rules and content policies).*

Policies and community standards are clearly explained at both admin (adult onboarding) and class level. Teachers will be explicitly advised to set out sanctions for children who do not adhere to the Natterhub policy. Class rules need to be displayed in the classroom at all times.

6. *Default settings: Settings must be 'high privacy' by default (unless you can demonstrate a compelling reason for a different default setting, taking account of the best interests of the child).*

Our joint venture partner has offered us world class, front line, web security and the imported content to the Natterhub platform is only accessible via the school firewall. There are no private messaging systems with Natterhub, so transparency is a major part of the security. Children's information will only be able to be accessed from within the IP address of the school similarly to all other information held on the school system.

7. *Data minimisation: Collect and retain only the minimum amount of personal data you need to provide the elements of your service in which a child is actively and knowingly engaged. Give children separate choices over which elements they wish to activate.*

All information collected will strictly adhere to the GDPR legislation and the agile nature of the platform build will allow teachers and children to have ownership of activation within Natterhub.

8. *Data sharing: Do not disclose children's data unless you can demonstrate a compelling reason to do so, taking account of the best interests of the child.*

Children's data will NOT be collected or disclosed by us as a company because it will belong to the school.

9. *Geolocation: Switch geolocation options off by default (unless you can demonstrate a compelling reason for geolocation, taking account of the best interests of the child), and provide an obvious sign for children when location tracking is active. Options which make a child's location visible to others must default back to off at the end of each session.*

There are no geolocation options within Natterhub relating to the children. Teachers may use a geolocation when relevant as part of a lesson within Natterhub, but this is not accessible by the pupils.

10. *Parental controls: If you provide parental controls, give the child age appropriate information about this. If your online service allows a parent or carer to monitor their child's online activity or track their location, provide an obvious sign to the child when they are being monitored.*

Natterhub has clear guidelines about information sharing with parents and these are set out in relation to our parent app. Children will be explicitly informed about the information their parents can observe.

11. *Profiling: Switch options which use profiling off by default (unless you can demonstrate a compelling reason for profiling, taking account of the best interests of the child). Only allow profiling if you have appropriate measures in place to protect the child from any harmful effects (in particular, being fed content that is detrimental to their health or wellbeing).*

All content will be filtered through our education channels to ensure that all content will be age appropriate, educational and supportive to positive, mental wellbeing.

12. *Nudge techniques: Do not use nudge techniques to lead or encourage children to provide unnecessary personal data, weaken or turn off their privacy protections, or extend their use.*

Natterhub features a timer for teachers to set according to the needs of the class. Natterhub provides suggested daily use times for each year group and these range from 15 to 45 minutes per day. In the event of any personal data being shared onto the site, the gated, secure site remains within the boundaries of the school's IP address. Other nudge techniques will feature as topics within lessons to ensure children are fully aware of the tactics used to keep people on the screen which can affect mental wellbeing.

- 13. Connected toys and devices: If you provide a connected toy or device ensure you include effective tools to enable compliance with this code.*

Natterhub is a SAAS model and we are building software, not the device.

- 14. Online tools: Provide prominent and accessible tools to help children exercise their data protection rights and report concerns.*

Children are actively encouraged to have both a ‘trusted adult’ and the knowledge of what to do when they need support as a result of online activity. Throughout the lessons, children are reminded of the uses and benefits of the ‘trusted adult’ in relation to reporting issues, oversharing etc.

- 15. Data protection impact assessments: Undertake a DPIA specifically to assess and mitigate risks to children who are likely to access your service, taking into account differing ages, capacities and development needs. Ensure that your DPIA builds in compliance with this code.*

The benefits of us working with our joint venture partner means that we have access to their broad, deep experience of safe online activity for their 4.5 million users.

- 16. Governance and accountability: Ensure you have policies and procedures in place which demonstrate how you comply with data protection obligations, including data protection training for all staff involved in the design and development of online services likely to be accessed by children. Ensure that your policies, procedures and terms of service demonstrate compliance with the provisions of this code.*

We will.