

STEFFI HESKETH TUTORING

Safeguarding and Child Protection Policy

For online one-to-one and small-group tutoring | Version 1.0

DOCUMENT CONTROL	
Policy owner	Steffi Hesketh, Founder and Designated Safeguarding Lead (DSL)
Effective from	21 July 2026
Scheduled review	By 21 July 2027, and sooner following guidance changes, an incident or a change to services
KCSIE transition	Reviewed against KCSIE 2025 and KCSIE 2026. KCSIE 2025 remains in force for schools and colleges until 31 August 2026; KCSIE 2026 applies from 1 September 2026.
Applies to	All tutors, employees, contractors, volunteers, students, parents/carers and anyone acting on behalf of the business
Status	Approved and operational - public website version

Approval

Approved by: Steffi Hesketh, Founder and Designated Safeguarding Lead Date: 21 July 2026

Important status note

Keeping Children Safe in Education (KCSIE) applies directly to schools and colleges. Steffi Hesketh Tutoring is a private online tutoring business, but voluntarily adopts the relevant safeguarding principles as good practice.

Where a tutor also works for a school, college or other organisation, they must also follow that organisation's safeguarding procedures.

Safeguarding at a glance

URGENT ACTION

If a child is in immediate danger or a crime is in progress, call 999.

- Do not wait for the DSL, a parent or the end of a lesson.
- After contacting emergency services, inform the DSL as soon as it is safe to do so.

Designated Safeguarding Lead (DSL): Steffi Hesketh

Safeguarding email: steffiheskethtutoring@gmail.com

DSL telephone: 07802 828910

Alternative safeguarding route: no deputy is currently appointed. If the DSL is unavailable, implicated or does not act, contact children's social care, police or the LADO directly (Appendix 2).

Every tutor must follow these five steps

1. Recognise: remain alert to signs, disclosures, online behaviour and changes that may indicate abuse, neglect or exploitation.
2. Respond: listen calmly, take the child seriously, do not promise secrecy and do not investigate.
3. Record: write a factual account as soon as possible, using the child's exact words where possible.
4. Report: contact the DSL immediately and no later than the end of the same working day. Urgent concerns must be reported by telephone, not email alone.
5. Refer or escalate: if there is immediate danger, the DSL is unavailable, the concern is about the DSL, or the response is inadequate, contact police, the child's local authority children's services or the LADO directly.

The child's location matters

Because tuition is online and students may live anywhere in the UK or overseas, a referral must normally be made to the safeguarding authority for the area in which the child lives or is physically located - not automatically to Southampton.

The Southampton contacts in Appendix 2 are for children who live in Southampton and for allegations connected to the business as a Southampton-based provider.

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1. Purpose, scope and principles

This policy sets out how Steffi Hesketh Tutoring safeguards and promotes the welfare of children who receive online tuition. It explains how concerns are recognised, recorded, reported, referred and reviewed, and how allegations concerning tutors or other adults are managed.

1.1 Scope

- This policy applies to all employees, self-employed tutors, contractors, volunteers, agency workers and anyone representing the business.
- It covers one-to-one tuition, group tuition, free trials, parent/tutor WhatsApp groups, email, learning platforms, lesson recordings, resources, social media and any other business-related communication.
- A child means anyone who has not yet reached their 18th birthday. The policy also supports appropriate action where an adult learner may be at risk of abuse or neglect.
- Parents/carers, students and tutors will be told how to raise a concern and how to access this policy.

1.2 Our safeguarding commitment

- The welfare and best interests of the child are paramount.
- Safeguarding is everyone's responsibility; no tutor should assume that someone else will act.
- All concerns are taken seriously, including concerns that appear minor, occur outside lessons, happen online or involve another child.
- Children will be listened to, believed and supported. Their wishes and feelings will be considered, but cannot override the duty to protect them or others from harm.
- The business maintains an attitude that abuse can happen in any family, community or organisation and that "it could happen here".
- Safeguarding action will be child-centred, timely, proportionate, inclusive and non-discriminatory.
- Under no circumstances may a tutor, employee, contractor or person acting on behalf of Steffi Hesketh Tutoring inflict physical or psychological harm on a child.
- Poor practice, boundary breaches and low-level concerns will be addressed before they create greater risk.

1.3 Safeguarding and child protection

Safeguarding is the action taken to promote children's welfare, prevent harm, protect children from maltreatment and ensure they grow up with safe and effective care.

Child protection is part of safeguarding and refers to action taken where a particular child is suffering, or is likely to suffer, significant harm.

2. Legal and guidance framework

This policy has been written for a private online tutoring provider in England and reflects the principles of the following legislation and guidance, as applicable to the business and its work:

- Department for Education, Out-of-school settings: safeguarding guidance for providers (updated February 2026), which specifically covers private tuition.
- Children Act 1989, including section 17 (children in need) and section 47 (reasonable cause to suspect significant harm).
- Children Act 2004 and the duty of agencies to cooperate to improve children's wellbeing.
- Working Together to Safeguard Children 2026: statutory guidance on multi-agency working to help, support and protect children.
- Keeping Children Safe in Education 2025, which remains in force for schools and colleges until 31 August 2026, and KCSIE 2026 from 1 September 2026. The business adopts relevant principles as good practice.
- Children and Social Work Act 2017 and local safeguarding partnership arrangements.
- Counter-Terrorism and Security Act 2015 and Prevent duty guidance for England and Wales.
- Education Act 2002, Equality Act 2010, Children and Families Act 2014 and SEND Code of Practice: 0 to 25 years.
- Sexual Offences Act 2003, Female Genital Mutilation Act 2003, Serious Crime Act 2015, Domestic Abuse Act 2021 and Modern Slavery Act 2015.
- Data Protection Act 2018, UK GDPR and Information Sharing Advice for Safeguarding Practitioners (May 2024).
- Online Safety Act 2023 and relevant UK law concerning harmful or illegal online content and communications.
- Southampton Safeguarding Children Partnership arrangements and the Hampshire, Isle of Wight, Portsmouth and Southampton (HIPS) safeguarding procedures, where relevant.

Guidance transition in 2026

This policy has been reviewed against both KCSIE 2025 and the final KCSIE 2026. KCSIE applies directly to schools and colleges rather than this private tutoring business; relevant principles are adopted as good safeguarding practice.

3. Roles and responsibilities

3.1 The business owner / Designated Safeguarding Lead

Steffi Hesketh is the policy owner and Designated Safeguarding Lead (DSL). The DSL is responsible for:

- acting as the main point of contact for safeguarding concerns and allegations;
- making or overseeing referrals to children's social care, police, Prevent/Channel, the LADO, DBS, Teaching Regulation Agency or other agencies as required;
- keeping secure, accurate and separate safeguarding records and documenting the rationale for decisions;
- providing advice and support to tutors, while making clear that any tutor may contact statutory services directly;
- ensuring safer recruitment checks, safeguarding induction and training records are maintained;
- monitoring patterns of concern, complaints, tutor conduct, online safety and low-level concerns;
- liaising with parents/carers and other professionals where safe and appropriate;
- reviewing this policy at least annually and following any significant incident, learning review or change in law or guidance.

3.2 All tutors and people working for the business

- must read, understand and follow this policy and the Tutor Code of Conduct before working with students;
- must complete safeguarding induction and required refresher training;
- must report concerns immediately, even where evidence is limited or another person has already been told;
- must never investigate, promise confidentiality, contact an alleged abuser or delay action while seeking proof;
- must maintain professional boundaries in lessons and all digital communication;
- must report changes that may affect their suitability to work with children, including police involvement, safeguarding allegations, relevant disciplinary action or a change to DBS status;
- remain personally responsible for acting if they believe a child is at risk and the DSL is unavailable or has not taken appropriate action.

3.3 Parents and carers

- should provide accurate contact, medical, SEND and safeguarding information needed to support safe tuition;
- should ensure an appropriate adult is contactable during online lessons, particularly for younger or vulnerable children;
- must not record, share or publish lesson content, images or recordings without permission;
- should raise concerns promptly through the business safeguarding or complaints route.

4. Safer recruitment, induction and training

4.1 Safer recruitment and ongoing suitability

The business uses a proportionate safer recruitment process designed to deter, identify and reject unsuitable applicants. Depending on the role and legal eligibility, this includes:

- identity and right-to-work checks;
- verification of qualifications, teacher status and relevant experience;
- employment history and explanation of significant gaps;
- professional references and follow-up where information is unclear;
- enhanced DBS checks and children's barred-list information where the role and law permit or require them, including Update Service checks where used;
- online searches or other proportionate pre-engagement checks where lawful and appropriate;
- signed declarations concerning criminal history, suitability, professional conduct and conflicts of interest;
- agreement to the safeguarding policy, code of conduct, online safety requirements, confidentiality and data protection arrangements;
- ongoing monitoring of conduct, complaints, DBS status and suitability. Checks are not treated as a one-off exercise.

4.2 Induction and training

- All tutors receive safeguarding induction before their first student, including how to recognise, respond, record, report and escalate concerns.
- Tutors receive safeguarding and child protection refresher training at least annually, with updates when risks, guidance or business procedures change.
- The DSL undertakes role-specific training at least every two years and receives regular safeguarding updates between formal courses.
- Online safety, child-on-child abuse, sexual violence and harassment, SEND vulnerability, professional boundaries and information sharing are included in training.
- Prevent awareness training is strongly encouraged for all tutors and may be required where the role or risk assessment indicates. Completion is recorded as safeguarding CPD.
- Training attendance, certificates and policy acknowledgements are recorded. Failure to complete required training may lead to work being paused.

Free official Prevent training: support-people-susceptible-to-radicalisation.service.gov.uk

5. Recognising abuse, neglect and safeguarding concerns

Abuse may occur in the home, community, an organisation, a relationship or online. It may be committed by adults or children, and a child may experience several forms at once. A single indicator does not prove abuse, but concerns must be shared rather than dismissed.

Type of concern	Examples and possible indicators
Physical abuse	Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, fabricated or induced illness, unexplained or inconsistent injuries, fear of going home.
Emotional abuse	Persistent criticism, humiliation, threats, rejection, controlling behaviour, exposure to domestic abuse, silencing, coercion, cyberbullying, developmentally inappropriate expectations or severe withdrawal.
Sexual abuse	Forcing or enticing a child to take part in sexual activity, contact or non-contact abuse, grooming, sexualised messages, exposure to pornography, sexual exploitation, image-based abuse or harmful sexual behaviour.
Neglect	Persistent failure to meet basic physical or psychological needs, including food, clothing, shelter, supervision, medical care, education, emotional warmth or protection from danger.
Child-on-child abuse	Bullying, cyberbullying, physical abuse, sexual violence, sexual harassment, coercive or controlling relationships, initiation or hazing, upskirting, abuse in intimate relationships, sharing nude or semi-nude images, prejudice-based abuse.
Exploitation outside the home	Child sexual exploitation, child criminal exploitation, county lines, serious youth violence, trafficking, modern slavery, financial exploitation, gang association, missing episodes or unexplained gifts/money.
Domestic abuse	A child may see, hear or experience the effects of abuse between adults or within their own intimate relationship. This may include coercive control, threats, physical, sexual, economic or technology-facilitated abuse.
Honour-based abuse	Female genital mutilation, forced marriage and other abuse committed to protect or defend perceived family or community honour.

Type of concern	Examples and possible indicators
Radicalisation and extremism	Vulnerability to extremist influence, concerning changes in language, relationships or online activity, fixation on harmful ideologies, dehumanising views or intent to cause harm. There is no single profile.
Online harm	Grooming, harassment, coercion, scams, sextortion, exposure to harmful content, impersonation, doxxing, live-streamed abuse, harmful challenges, excessive secrecy or rapid changes in online behaviour.
Self-harm, suicide risk or mental health concerns	Mental health difficulties can be an indicator that a child has suffered or is at risk of abuse, neglect or exploitation. Immediate risk of serious self-harm or suicide requires emergency action.
Fabricated or induced illness / perplexing presentations	A parent or carer may exaggerate, fabricate or induce illness, or a child's presentation may be inconsistent and require multi-agency assessment.

5.1 Indicators relevant to online tutoring

- a child appears frightened, distressed, hungry, exhausted, unusually withdrawn or unable to speak freely;
- an adult is heard threatening, humiliating or harming a child, or inappropriate activity is visible in the background;
- a child discloses abuse directly, indirectly, through written chat, work, drawings or changes in behaviour;
- sexualised, threatening or discriminatory messages are sent in a lesson or group chat;
- a child is repeatedly interrupted, monitored or prevented from participating;
- unexplained absence, sudden loss of contact, significant deterioration, talk of running away, self-harm or suicide;
- evidence of grooming, exploitation, extremist material, coercion, blackmail, sextortion or pressure to share images;
- a tutor, parent or another student breaches professional or digital boundaries.

6. Responding to a disclosure or concern

A child may disclose abuse in words, writing, chat messages, behaviour or indirectly. The tutor's role is to receive and report - not to investigate.

6.1 What to do

1. Stay calm, listen carefully and give the child time. Take what they say seriously.
2. Reassure the child that they have done the right thing by speaking and that the abuse is not their fault.
3. Explain that you cannot keep the information secret and must share it with people who can help keep them safe.
4. Ask only minimal, open questions needed to clarify immediate safety, such as "Tell me what happened" or "Is anyone in danger now?". Avoid leading questions.
5. Do not investigate, seek proof, interview other people, confront the alleged abuser or ask the child to repeat the account unnecessarily.
6. Preserve relevant digital evidence. Do not forward intimate images or make unnecessary copies. Record where the evidence is located and seek DSL/police advice.
7. If the child is in immediate danger, call 999. Keep the online connection open only if safe and helpful; do not place yourself or the child at greater risk.
8. Make a written record immediately after the conversation and report to the DSL without delay.

6.2 Recording the concern

- Record the date, time, platform and who was present.
- Use the child's exact words where possible and clearly separate fact, observation, opinion and information reported by others.
- Describe visible or audible signs objectively. Do not take photographs of injuries unless specifically directed by police or children's social care.
- Record questions asked, immediate actions taken, who was contacted and at what time.
- Sign and date the record and send it securely to the DSL. Do not store safeguarding records in ordinary lesson notes or personal cloud folders.

Do not promise confidentiality

A child should be told, in age-appropriate language, that the information will only be shared with people who need to know in order to help. Consent is helpful but is not required where sharing is necessary to protect a child.

7. Reporting, referral and escalation procedures

7.1 Internal reporting system

- Parents/carers and members of the public may raise a concern using the safeguarding email or telephone number in this policy. Please send only the minimum information needed to request a prompt call back; detailed safeguarding information will then be collected and stored through the secure reporting process.
- Urgent concerns: telephone the DSL immediately. Do not rely on email, forms or WhatsApp alone.
- All other safeguarding concerns: report to the DSL as soon as possible and before the end of the same working day using the safeguarding concern record in Appendix 1 or the approved secure reporting system.
- The DSL will acknowledge receipt, assess immediate risk, identify the child's local authority, decide next steps, record the rationale and provide appropriate feedback to the reporter.
- The reporter must follow up if they do not receive acknowledgement or remain concerned. A lack of certainty is not a reason to delay.
- Any person may make a direct referral to children's social care or police. The DSL's availability or agreement is not a precondition for protecting a child.

7.2 Decision-making and external referrals

The DSL will consider the level of need, the child's wishes and safety, family circumstances, local thresholds and advice from statutory agencies. Possible action includes:

- continuing to monitor with a clear review date where there is no current risk of harm;
- supporting or signposting the family to early help or other services;
- making a child-in-need referral under section 17 of the Children Act 1989;
- making an urgent child-protection referral where there is reasonable cause to suspect significant harm under section 47;
- contacting police where a crime may have been committed or immediate protection is required;
- making a Prevent/Channel referral where there is concern about susceptibility to radicalisation;
- contacting the LADO where a concern or allegation relates to an adult who works with children;
- contacting the DBS or Teaching Regulation Agency where legal referral criteria may be met.

7.3 Informing parents or carers

Parents/carers will normally be informed about concerns and referrals unless doing so could increase risk, place a child or another person in danger, prejudice a police or social care investigation, or be contrary to advice from statutory agencies. The reason for sharing or withholding information will be recorded.

7.4 Escalation and professional challenge

- If the DSL does not act, is unavailable or is the subject of the concern, the tutor must contact children's social care, police or the LADO directly.
- If a referral is not accepted and the tutor or DSL remains concerned, they will seek reconsideration, use the local escalation procedure and continue to act in the child's best interests.
- Concerns must not be downgraded because tuition is online, the child appears academically able, the family is known to the tutor or there is no visible injury.

8. Child-on-child abuse

Child-on-child abuse can occur between two children of any age or sex, within friendships or intimate relationships, in group sessions, private messages, social media or outside tuition. It may be one-off or repeated and can cause serious harm.

8.1 Zero-tolerance approach

- All reports are taken seriously. Behaviour will not be dismissed as "banter", "part of growing up", "just a joke" or "boys being boys".
- The absence of a report does not mean abuse is not happening. Tutors remain alert to signs and create safe ways for children to speak.

- Sexual harassment, sexual violence, coercion, image-based abuse, upskirting, cyberbullying, prejudice-based abuse and harmful sexual behaviour are safeguarding concerns.
- The business recognises that children who cause harm may also have unmet needs and require support, without minimising the impact on the child harmed.

8.2 Response

- Take immediate steps to stop the behaviour and secure the online environment, for example disabling chat, removing a participant or ending the session where necessary.
- Support the child who has reported or experienced harm, preserve evidence and report to the DSL immediately.
- Complete a proportionate risk assessment covering contact between children, future group attendance, communication channels, support needs and any wider risk.
- Consider referrals to children's social care and police, particularly for sexual violence, serious assault, threats, exploitation or non-consensual images.
- Inform parents/carers where safe and appropriate, taking advice from statutory services where needed.
- Record decisions separately for each child and review safety arrangements.

9. Online tutoring and digital safeguarding

Online tuition creates specific safeguarding risks. The business reduces these through approved platforms, clear professional boundaries, parental involvement, secure records and prompt action when concerns arise.

9.1 Required online practice

- Tutors use business-approved platforms, accounts and communication arrangements wherever possible.
- Communication with a child outside lessons must be educational, necessary and through an approved channel. A parent/carer or the business should be included in messaging wherever possible; private social media contact is prohibited.
- Tutors must not add students as friends/followers, use disappearing-message features, exchange personal photographs, make personal video calls or communicate secretly.
- Parent/tutor WhatsApp groups must include the parent/carer and should be limited to lesson organisation, resources and appropriate feedback. Tutors must not create private WhatsApp chats with children.
- Tutors use a professional setting, appropriate dress and a neutral or blurred background. Personal or confidential information should not be visible.
- Children may keep cameras off where agreed. Camera use must never be coerced. Safeguarding concerns arising from what is seen, heard or written must still be reported.
- Tutors must not take screenshots, photographs or recordings on personal devices. Any authorised recording must follow the Recording and Retention Policy, use informed consent and be stored securely.
- Tutors must not share meeting links publicly. Waiting rooms, passwords, host controls and restricted screen-sharing/chat features should be used where available.
- Tutors should end or pause a lesson if another person behaves inappropriately, sexual or illegal content appears, or the environment becomes unsafe, while taking emergency action where necessary.
- AI tools, shared documents and learning platforms must not be used to upload unnecessary personal or safeguarding information. Children's work and data must be handled in line with the Privacy Policy.

9.2 Recordings and evidence

- Parents/carers and children must be informed when a lesson is recorded and how the recording will be used, accessed, stored and deleted.
- Recordings are not a substitute for live safeguarding practice and are not routinely reviewed unless there is a legitimate educational, quality or safeguarding reason.
- Where a recording may contain evidence of abuse or a crime, it must be preserved securely and access restricted. The DSL will seek police or social care advice before copying or sharing it.
- Intimate images of a child must never be printed, copied, forwarded or stored unnecessarily. Staff should follow police/DSL instructions and avoid viewing such content beyond what is unavoidable to identify the concern.

10. SEND, inclusion and additional vulnerability

Children with special educational needs and disabilities (SEND), communication needs, mental health difficulties, care experience, English as an additional language or other vulnerabilities may face additional safeguarding barriers. These can include difficulty recognising or reporting abuse, dependence on adults, isolation, online targeting and assumptions that signs of harm are caused by a condition or behaviour.

- Tutors must never assume that distress, withdrawal, challenging behaviour, missed lessons or communication differences are simply part of a child's SEND.
- Children must be offered accessible ways to communicate concerns, including speech, chat, writing, visual prompts, breaks, additional processing time and support from a trusted adult where appropriate.
- Reasonable adjustments will be planned without reducing safeguarding expectations or a child's right to privacy, dignity and protection.
- The DSL will consider the child's communication profile when recording, sharing information and seeking their wishes and feelings.
- Concerns about bullying, exploitation, restraint, medication, intimate care or discriminatory abuse will be treated as safeguarding matters where appropriate.
- This section should be read with the SEND and Inclusion Policy and the Equality, Diversity and Inclusion commitments of the business.

11. Preventing radicalisation

Radicalisation is the process through which a person comes to support terrorism or extremist violence. Susceptibility may be influenced by personal, family, social or online factors. There is no single indicator, and concerns must be considered in context without stereotyping or discrimination.

The statutory Prevent duty applies to specified authorities. As a private online tutoring provider, Steffi Hesketh Tutoring adopts relevant Prevent principles as safeguarding good practice and will cooperate with statutory agencies where concerns arise.

- Tutors should be alert to concerning changes in language, online activity, relationships, isolation, dehumanising views, fixation on violence, access to extremist material or expressions of intent to harm.
- Legitimate debate, political views, religious belief or challenging ideas are not themselves evidence of radicalisation.
- Concerns must be recorded and reported to the DSL using the same safeguarding process as any other concern.
- The DSL may seek advice from the child's local authority Prevent team or make a Channel referral. Channel is a voluntary, multi-agency safeguarding programme.
- Where there is an immediate threat or suspected terrorism offence, call 999. For non-emergency police concerns, use 101 or the relevant counter-terrorism reporting route.
- Prevent action must respect equality, freedom of expression and the child's rights while prioritising safety.

12. Allegations and low-level concerns about adults

All concerns about the conduct of a tutor, contractor, volunteer or other adult working with children will be taken seriously and managed fairly, promptly and confidentially. This includes conduct in work, another organisation, personal life or online activity that may affect suitability.

12.1 Allegations that may meet the harm threshold

The LADO should be contacted where it is alleged that a person who works with children has:

- behaved in a way that has harmed a child or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm;
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.
- The concern must be reported to the DSL immediately. The DSL will contact the relevant LADO without delay and normally within one working day, before beginning an internal investigation.
- If the allegation concerns Steffi Hesketh or there is a conflict of interest, the reporter must contact the Southampton LADO and/or children's social care directly.
- Immediate steps may include protecting the child, preserving evidence, restricting systems or student contact, and seeking police/LADO advice. Suspension is not automatic and will be considered proportionately.
- Parents/carers and the adult concerned will be informed at an appropriate time in line with LADO/police advice. Confidentiality will be maintained as far as possible.
- The business will consider DBS and Teaching Regulation Agency referrals where legal criteria are met, including where a person is removed from regulated activity because they harmed or posed a risk to a child.

12.2 Low-level concerns

A low-level concern is any concern, however small, that an adult may have acted in a way inconsistent with the Tutor Code of Conduct, but which does not appear to meet the harm threshold. Examples include over-familiarity, favouritism, inappropriate messaging, using sexualised language, taking unauthorised images, sharing personal information, secret contact or failing to report a boundary breach.

- Low-level concerns and self-reports must be shared with the DSL promptly.

- The DSL will record and review concerns, identify patterns, take proportionate action and consult the LADO where the threshold is unclear.
- A concern will not be ignored because it seems minor, was well-intentioned or did not cause visible harm.
- Records will be handled confidentially and retained in accordance with the safeguarding retention schedule.

13. Information sharing, confidentiality and records

13.1 Information sharing

- Data protection law is not a barrier to sharing information where this is necessary and proportionate to safeguard a child.
- The business will seek consent where appropriate, but may share without consent where there is a lawful safeguarding basis, where seeking consent could increase risk or where consent is refused but safety requires action.
- Information shared will be necessary, proportionate, relevant, adequate, accurate, timely and secure.
- Families will normally be told what is being shared and with whom unless this would be unsafe or prejudice an investigation.
- The decision to share or not share, the information considered and the rationale will be recorded.

13.2 Safeguarding records

- Safeguarding records are factual, dated, signed and stored separately from routine tuition notes with access restricted to those who need to know.
- Records include concerns, disclosures, referrals, advice received, decisions, actions, outcomes, allegations, low-level concerns and relevant communications.
- Electronic records are protected using appropriate access controls, encryption and secure backups. Safeguarding information must not be kept solely on a tutor's personal device.
- Records are transferred securely where another organisation needs them to protect the child, with a copy or transfer log retained as appropriate.
- Records will normally be retained until the child's 25th birthday, or longer where advised by statutory agencies, insurers or legal counsel. Retention will be reviewed and information will not be kept longer than necessary.
- Any data breach involving safeguarding information must be reported immediately to the DSL and handled under the Data Protection and Breach Response procedures.

14. Supporting children, families and tutors

- The child's safety, dignity, voice and continued access to education will remain central to decisions.
- The business will make reasonable adjustments and consider whether a different tutor, lesson format, communication method, pause or additional support is needed.
- Parents/carers will be treated respectfully and kept informed where safe, but the business will not mediate or investigate allegations that require statutory involvement.
- Tutors who receive a disclosure may be affected by what they hear. The DSL will offer debriefing, practical guidance and signposting while preserving confidentiality.
- A person subject to an allegation will be treated fairly, given appropriate information and signposted to support, without compromising child protection or an investigation.
- No child or adult will be disadvantaged for raising a genuine concern in good faith.

15. Whistleblowing and complaints

15.1 Whistleblowing

Tutors and others must raise concerns about unsafe practice, failures to follow this policy, concealment of concerns or inadequate safeguarding action. Concerns should normally be reported to the DSL. Where this is inappropriate, ineffective or the concern involves the DSL, the person should contact the LADO, children's social care, police or the NSPCC Whistleblowing Advice Line directly.

- A person raising a concern in good faith will not be penalised or disadvantaged.
- Confidentiality will be respected, although anonymity cannot be guaranteed where a fair investigation or legal process requires identification.
- Malicious or knowingly false allegations may be addressed under contractual or disciplinary procedures, but an unsubstantiated concern is not automatically malicious.

15.2 Complaints

A complaint about tuition quality, administration or service should be handled under the Complaints Policy. Where a complaint includes possible harm, abuse, neglect, professional boundary concerns or unsafe practice, the safeguarding procedure takes priority. The complainant will be told that the matter has been transferred to the safeguarding route where it is appropriate and safe to do so.

16. Monitoring, review and linked policies

16.1 Monitoring and quality assurance

- The DSL will review safeguarding records, patterns, response times, referrals, allegations, low-level concerns, complaints, training completion and safer recruitment compliance.
- Learning from incidents, referrals, complaints, statutory advice and safeguarding reviews will be used to improve systems and training.
- The business may audit approved communication channels, lesson records or platform settings where proportionate and in line with privacy notices.
- Safeguarding arrangements will be considered when introducing new platforms, AI tools, group formats, international services or recording practices.

16.2 Review cycle

- This policy will be formally reviewed at least annually.
- It will be updated sooner following a safeguarding incident, complaint, local learning review, change to business practice, new technology, statutory guidance or legislation.
- This policy has been reviewed against KCSIE 2026, published on 7 July 2026 and due to come into force for schools and colleges on 1 September 2026. Relevant principles have been incorporated as good practice.
- The current approved version will be made available to tutors and parents/carers, and material changes will be communicated.

16.3 Linked policies and procedures

- Online Safety and Acceptable Use Policy
- Tutor Code of Conduct and Professional Boundaries
- Safer Recruitment and DBS Policy
- Managing Allegations and Low-Level Concerns Procedure
- Whistleblowing Policy
- Complaints Policy
- Privacy Policy and Data Protection Policy
- Data Retention and Breach Response Procedure
- SEND and Inclusion Policy
- Equality, Diversity and Inclusion Policy
- Lesson Recording and Retention Policy
- Terms and Conditions / Parent and Tutor Agreements

Publication and implementation

- This public version is available to parents/carers, students and tutors.
- Tutors receive separate secure reporting instructions and must acknowledge this policy.
- Urgent concerns must be reported by telephone; sensitive details must not be sent through ordinary WhatsApp or unsecured email.
- The policy and contact details are reviewed at least annually and sooner when guidance, services or risks change.

Appendix 1: Safeguarding concern record

Complete as soon as possible. For urgent concerns, telephone the DSL or emergency services first. Use additional pages where necessary. Do not email sensitive information without using an approved secure method.

Child/student name	
Date of birth / age / year group	
Home address / country / local authority	
Parent/carer name and contact	
Tutor/person reporting	
Date and time concern arose	
Lesson/platform and who was present	
Immediate danger? Emergency action taken?	

Factual account of concern or disclosure. Use the child's exact words and identify what was seen, heard or reported.

Questions asked and the child's response

Immediate action taken, including people contacted and times

Reporter signature: _____ Date/time submitted: _____

Appendix 1 continued: DSL decision and action record

Risk assessment, threshold considered and advice obtained

Referral/action taken, agency/contact, date/time and outcome

Parent/carer informed? If not, record why. Child's wishes and feedback provided.

Follow-up actions, responsible person and review date

DSL signature: _____ **Date/time:** _____

Appendix 2: Key safeguarding contacts

Emergency

Immediate danger or crime in progress: 999

- Police non-emergency: 101

Business contacts

DSL	Steffi Hesketh
Safeguarding email	steffiheskethtutoring@gmail.com
DSL telephone	07802 828910
Deputy/alternative contact	No deputy currently appointed. If the DSL is unavailable, implicated or does not act, contact statutory services or the LADO directly.

Southampton: concerns about a child

Professionals - office hours	Children's Resource Service: 023 8083 2300
Public / parents - office hours	Children's Resource Service: 023 8083 3004
Outside office hours	Emergency Duty Team: 023 8023 3344
Email	childrensresourceservice@southampton.gov.uk
Online information	Southampton City Council - Report a concern about a child

Use these contacts only where Southampton is the relevant local authority. For a child living elsewhere, contact the children's services team for the area where the child lives or is physically located.

Southampton LADO: concerns about an adult working with children

Telephone	023 8091 5535
Mobile	07500 952 037
Email	LADO@southampton.gov.uk
Purpose	Advice, guidance and management of allegations or suitability concerns relating to people who work or volunteer with children

National support

NSPCC Helpline	0808 800 5000 help@nspcc.org.uk
NSPCC Whistleblowing Advice Line	0800 028 0285 help@nspcc.org.uk
Childline	0800 1111
Prevent training	support-people-susceptible-to-radicalisation.service.gov.uk/portal

International students

Where a child is outside the UK, use the emergency services and child protection authority for the country/region where the child is physically located. The DSL should seek specialist advice and, where safe, liaise with the child's parent/carers, school or other responsible agency. A UK emergency number cannot dispatch help overseas.

Appendix 3: Reporting flowchart

1. Concern arises or child discloses	Listen, take seriously, do not investigate or promise secrecy.
2. Is anyone in immediate danger?	YES: call 999 and take reasonable steps to protect the child. Then inform the DSL. NO: continue to step 3.
3. Record	Write a factual, dated account immediately. Preserve relevant digital evidence without forwarding intimate images.
4. Report	Telephone the DSL for urgent concerns. Submit the secure concern record the same day.
5. DSL assesses and acts	Identify the child's location/local authority; consider early help, children's social care, police, Prevent/Channel, LADO or other referral.
6. Follow up and escalate	If no action is taken, the DSL is unavailable/involved, or concern remains, contact statutory services directly and use local escalation procedures.
7. Record outcome and review	Document decisions, advice, parent communication, child's wishes, actions, outcome and review date.

Appendix 4: Reference documents

The following sources were used when preparing this policy. Website content and contact details should be checked at each review.

- Out-of-school settings: safeguarding guidance for providers: <https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice>
- **Working Together to Safeguard Children 2026:** <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- **Keeping Children Safe in Education:** <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- **Prevent duty guidance: England and Wales:** <https://www.gov.uk/government/publications/prevent-duty-guidance>
- **Information Sharing Advice for Safeguarding Practitioners:** <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>
- **Children Act 1989:** <https://www.legislation.gov.uk/ukpga/1989/41/contents>
- **Southampton Safeguarding Children Partnership:** <https://www.southampton.gov.uk/children-families/childrens-social-care/southampton-safeguarding-children-partnership/>
- **Southampton - Report a concern about a child:** <https://www.southampton.gov.uk/children-families/childrens-social-care/report-a-concern-about-a-child/>
- **Southampton LADO / managing allegations:** <https://www.southampton.gov.uk/children-families/childrens-social-care/southampton-safeguarding-children-partnership/professionals/policies-and-procedures/allegations-of-abuse-by-people-that-work-or-volunteer-with-children/>