Safeguarding and Child Protection Policy

Steffi Hesketh Tutoring – online one-to-one and small-group tutoring | Version 1.1 (November 2026) – public website version

Document control	**Details**
Document	Safeguarding and Child Protection Policy
Organisation	Steffi Hesketh Tutoring (sole trader), online-only tutoring, based in Southampton, Hampshire
Business address	32 Inver Way, Southampton, SO19 1SF
Policy owner	Steffi Hesketh-Spells, Owner and Designated Safeguarding Lead (DSL)
Deputy DSL	Shim Amin, contactable via the business email (steffihesketthtutoring@gmail.com)
Contact	steffihesketthtutoring@gmail.com, 07802 828910
Version	1.1. Replaces version 1.0 (21 July 2026)
Effective date	November 2026
Review date	November 2027, or sooner after a serious incident, a change in law or guidance, a change to services or a change to the Hampshire contract
Applies to	Steffi Hesketh-Spells, all self-employed tutors, cover tutors, contractors, volunteers and anyone else working for or on behalf of the business. Parents, carers and students are told how to raise a concern under this policy.
Contract	Hampshire County Council SEND Alternative Provision Register Agreement CS25116 and

Document control	Details
	Tutoring Call-Off Contract CS25116A, for Council-referred pupils
KCSIE	Reviewed against Keeping Children Safe in Education (KCSIE) 2026, in force from 1 September 2026
Approved by	Steffi Hesketh-Spells. Signature: Steffi Hesketh-Spells, Owner and Designated Safeguarding Lead. Date approved: 9 November 2026

What changed in version 1.1: Hampshire contacts added (Children's Reception Team, out-of-hours service, Hampshire LADO and its online forms, and the Hampshire Safeguarding Children Partnership and HIPS procedures); Shim Amin added as Deputy DSL; Southampton contacts kept for Southampton pupils; cross-references added to the new Tutor Code of Conduct and Whistleblowing Policy; owner's name updated to Steffi Hesketh-Spells.

Important status note. KCSIE applies directly to schools and colleges. Steffi Hesketh Tutoring is a private online tutoring agency working with independent, self-employed tutors. We voluntarily adopt the relevant KCSIE principles as good practice, and we follow the safeguarding requirements of our Hampshire County Council contract for Council-referred pupils. 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, tell the DSL as soon as it is safe to do so.

Role	Name	Contact
Designated Safeguarding Lead (DSL)	Steffi Hesketh-Spells	07802 828910, steffiheskethtutoring@gmail.com

Role	Name	Contact
Deputy DSL	Shim Amin	Via the business email (steffiheskethtutoring@gmail.com)

If the DSL is unavailable, contact the Deputy DSL. If neither can be reached, or the concern is about either of them, or they do not act, contact children's social care, the police or the LADO directly (Appendix 2).

Every tutor must follow these five steps

1. **Recognise:** stay alert to signs, disclosures, online behaviour and changes that may point to 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 you can.
4. **Report:** contact the DSL (or the Deputy DSL) straight away, and no later than the end of the same working day. Urgent concerns must be reported by telephone, not by email alone.
5. **Refer or escalate:** if there is immediate danger, the DSL and Deputy DSL are unavailable, the concern is about either of them, or the response is not good enough, contact the police, the child's local authority children's services or the LADO directly.

The child's location matters. Because tuition is online and pupils may live anywhere in the UK or overseas, a referral must normally go to the safeguarding authority for the area where the child lives or is physically located – not automatically to Southampton or Hampshire.

- **Hampshire contacts** (Appendix 2) are for children who live in the Hampshire County Council area, including pupils referred by Hampshire County Council under the CS25116 contract.
- **Southampton contacts** (Appendix 2) are for children who live in Southampton (Southampton City Council area), and for allegations connected to the business as a Southampton-based provider.
- Southampton and Portsmouth are separate local authorities from Hampshire County Council. Check the child's home local authority in the pupil record before referring.

Contents

1. Purpose, scope and principles
2. Legal and guidance framework

3. Roles and responsibilities
4. Safer recruitment, induction and training
5. Recognising abuse, neglect and safeguarding concerns
6. Responding to a disclosure or concern
7. Reporting, referral and escalation procedures
8. Child-on-child abuse
9. Online tutoring and digital safeguarding
10. SEND, inclusion and additional vulnerability
11. Preventing radicalisation
12. Allegations and low-level concerns about adults
13. Information sharing, confidentiality and records
14. Supporting children, families and tutors
15. Whistleblowing and complaints
16. Monitoring, review and linked policies

- Appendix 1: Safeguarding concern record
- Appendix 2: Key contacts
- Appendix 3: Reporting flowchart
- Appendix 4: Reference documents

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 about tutors or other adults are managed.

1.1 Scope

- This policy applies to Steffi Hesketh-Spells, all self-employed tutors, cover tutors, contractors, volunteers and anyone representing the business.
- It covers one-to-one tuition, group tuition, free trials, parent and 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 find 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 someone else will act.
- All concerns are taken seriously, including concerns that seem minor, happen 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.
- We keep the 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.
- No tutor, contractor or person acting on behalf of Steffi Hesketh Tutoring may cause physical or psychological harm to a child.
- Poor practice, boundary breaches and low-level concerns will be dealt with 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 make sure they grow up with safe and effective care. Child protection is part of safeguarding. It means the 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 agency in England. It reflects the principles of the following legislation and guidance, as they apply to the business:

- Department for Education, Keeping children safe in out-of-school settings: guidance for providers, 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 co-operate to improve children's wellbeing.
- Working Together to Safeguard Children 2026.
- Keeping Children Safe in Education 2026, in force for schools and colleges from 1 September 2026. We adopt its relevant principles as good practice.
- Children and Social Work Act 2017 and local safeguarding partnership arrangements.
- Counter-Terrorism and Security Act 2015 and the Prevent duty guidance for England and Wales.
- Education Act 2002, Equality Act 2010, Children and Families Act 2014 and the 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).
- Public Interest Disclosure Act 1998 (whistleblowing), as described in our Whistleblowing Policy.

- Online Safety Act 2023 and related UK law on harmful or illegal online content and communications.
- **Local arrangements:** the Hampshire Safeguarding Children Partnership (HSCP) and the Southampton Safeguarding Children Partnership, and the Hampshire, Isle of Wight, Portsmouth and Southampton (HIPS) safeguarding procedures, which all four areas share.
- **Hampshire contract:** the safeguarding requirements of the Hampshire County Council SEND Alternative Provision Register Agreement CS25116 and Tutoring Call-Off Contract CS25116A, for Council-referred pupils.

3. Roles and responsibilities

3.1 The owner and Designated Safeguarding Lead

Steffi Hesketh-Spells 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, the police, Prevent and Channel, the LADO, the DBS, the Teaching Regulation Agency or other agencies as needed;
- keeping secure, accurate and separate safeguarding records, and recording the reasons for decisions;
- giving advice and support to tutors, while making clear that any tutor may contact statutory services directly;
- making sure safer recruitment checks, safeguarding induction and training records are kept up to date;
- watching for patterns in concerns, complaints, tutor conduct, online safety and low-level concerns;
- working with parents, carers, the Council and other professionals where safe and appropriate;
- telling Hampshire County Council about safeguarding concerns involving Council-referred pupils, as the contract requires, without ever delaying an urgent referral;
- reviewing this policy at least once a year and after any significant incident, learning review or change in law or guidance.

3.2 The Deputy DSL

Shim Amin is the Deputy DSL. The Deputy DSL:

- acts as the first point of contact for safeguarding concerns when the DSL is unavailable, on leave or unreachable;
- can take the same immediate action as the DSL, including making urgent referrals to children's social care, the police or the LADO;

- receives concerns about the DSL and refers them to the LADO where needed;
- keeps the DSL informed as soon as it is safe and appropriate, and records actions in the restricted concern record;
- completes DSL-level training at least every two years, with regular updates in between.

3.3 All tutors and people working for the business

Our tutors are independent and self-employed, but every tutor who works with pupils through the business must:

- read, understand and follow this policy, the Tutor Code of Conduct and the Whistleblowing Policy before working with pupils;
- complete safeguarding induction and the required refresher training;
- report concerns straight away, even when evidence is limited or someone else has already been told;
- never investigate, promise confidentiality, contact an alleged abuser or delay action while looking for proof;
- keep professional boundaries in lessons and in all digital communication, as set out in the Tutor Code of Conduct;
- report any change that may affect their suitability to work with children, including police involvement, safeguarding allegations, relevant disciplinary action or a change to their DBS status;
- remain personally responsible for acting if they believe a child is at risk and the DSL and Deputy DSL are unavailable or have not taken appropriate action.

3.4 Parents and carers

Parents and carers are asked to:

- give accurate contact, medical, SEND and safeguarding information needed to support safe tuition;
- make sure a responsible adult is contactable during online lessons, especially for younger or more vulnerable children;
- not record, share or publish lesson content, images or recordings without permission;
- raise concerns promptly through the safeguarding or complaints route.

4. Safer recruitment, induction and training

4.1 Safer recruitment and ongoing suitability

We use a proportionate safer recruitment process designed to deter, identify and reject unsuitable people. Depending on the role and legal eligibility, this includes:

- identity and right-to-work checks;
- checks of qualifications, teacher status and relevant experience;
- employment history, with significant gaps explained;
- professional references, followed up where information is unclear;
- enhanced DBS checks with children's barred list information where the role and the law allow or require them, including Update Service checks where used;
- online searches or other proportionate checks where lawful and appropriate;
- signed declarations about criminal history, suitability, professional conduct and conflicts of interest;
- agreement to this policy, the Tutor Code of Conduct, the Whistleblowing Policy, online safety rules, confidentiality and data protection;
- ongoing checks of conduct, complaints, DBS status and suitability. Checks are never treated as a one-off.

Tutors working with Council-referred pupils must also meet the vetting and approval requirements of the Hampshire contract before they start.

4.2 Induction and training

- All tutors receive safeguarding induction before their first pupil, covering how to recognise, respond, record, report and escalate concerns.
- Tutors complete safeguarding and child protection refresher training at least once a year, with updates when risks, guidance or our procedures change. Tutors must read KCSIE Part one (or Annex A where appropriate) each year.
- The DSL and Deputy DSL complete role-specific DSL training at least every two years and receive regular safeguarding updates between courses.
- Training covers online safety, child-on-child abuse, sexual violence and harassment, SEND vulnerability, professional boundaries and information sharing.
- Prevent awareness training is strongly encouraged for all tutors, and Steffi may require it where the role, the Hampshire contract or a risk assessment calls for it. Completion is recorded as safeguarding CPD.
- Training, certificates and policy acknowledgements are recorded. A tutor who does not complete required training may have their work paused.

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

5. Recognising abuse, neglect and safeguarding concerns

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

Type of concern	Examples and possible signs
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, expectations not suited to the child's development, 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 emotional 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, going missing, or unexplained gifts or 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.

Type of concern	Examples and possible signs
Honour-based abuse	Female genital mutilation, forced marriage and other abuse carried out to protect or defend the perceived honour of a family or community.
Radicalisation and extremism	Vulnerability to extremist influence; worrying changes in language, relationships or online activity; fixation on harmful ideas; 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 sudden changes in online behaviour.
Self-harm, suicide risk or mental health concerns	Mental health difficulties can be a sign that a child has suffered, or is at risk of, abuse, neglect or exploitation. An immediate risk of serious self-harm or suicide needs emergency action.
Fabricated or induced illness, or perplexing presentations	A parent or carer may exaggerate, fabricate or induce illness, or a child's presentation may be inconsistent and need multi-agency assessment.

5.1 Signs relevant to online tutoring

- a child seems 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 or indirectly, through chat, written work, drawings or changes in behaviour;
- sexualised, threatening or discriminatory messages are sent in a lesson or group chat;
- a child is repeatedly interrupted, watched or prevented from taking part;
- unexplained absence, sudden loss of contact, significant deterioration, or 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 pupil breaks 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 telling you and that the abuse is not their fault.
3. Explain that you cannot keep it secret and must share it with people who can help keep them safe.
4. Ask only the minimum open questions needed to understand immediate safety, such as "Tell me what happened" or "Is anyone in danger now?". Avoid leading questions.
5. Do not investigate, look for proof, question other people, confront the alleged abuser or ask the child to repeat their account unnecessarily.
6. Keep relevant digital evidence. Do not forward intimate images or make unnecessary copies. Record where the evidence is and ask the DSL or police for advice.
7. If the child is in immediate danger, call 999. Keep the online connection open only if it is safe and helpful. Do not put yourself or the child at greater risk.
8. Write a record straight 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 facts, observations, opinions and information reported by others.
- Describe visible or audible signs objectively. Do not photograph injuries unless the police or children's social care specifically ask you to.
- Record the questions you asked, the immediate action taken, who was contacted and when.
- Sign and date the record and send it securely to the DSL. Do not keep safeguarding records in ordinary lesson notes or personal cloud folders.

Do not promise confidentiality. Tell the child, in words suited to their age, that the information will only be shared with people who need to know in order to help. Consent is helpful but is not needed where sharing is necessary to protect a child.

7. Reporting, referral and escalation procedures

7.1 Internal reporting

- Parents, carers and members of the public can raise a concern using the safeguarding email or telephone numbers in this policy. Please send only the minimum information needed to ask for a prompt call back. Detailed information will then be collected and stored through the secure reporting process.
- **Urgent concerns:** telephone the DSL straight away. If the DSL does not answer, telephone the Deputy DSL. Do not rely on email, forms or WhatsApp alone.
- **All other concerns:** report to the DSL as soon as possible and before the end of the same working day, using the concern record in Appendix 1 or the approved secure reporting system.
- The DSL (or Deputy DSL) will acknowledge the report, assess immediate risk, identify the child's local authority, decide the next steps, record the reasons and give appropriate feedback to the person who reported.
- The person reporting must follow up if they do not hear back or are still worried. Being unsure is not a reason to delay.
- Anyone can make a referral directly to children's social care or the police. The DSL's availability or agreement is never a condition for protecting a child.

7.2 Decisions and external referrals

The DSL will consider the level of need, the child's wishes and safety, family circumstances, local thresholds (including the Hampshire and Isle of Wight Thresholds Chart for Hampshire children) and advice from statutory agencies. Possible actions include:

- 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 the police where a crime may have been committed or immediate protection is needed;
- making a Prevent or Channel referral where there is concern about vulnerability to radicalisation;
- contacting the LADO where a concern or allegation is about an adult who works with children;
- contacting the DBS or the Teaching Regulation Agency where the legal referral criteria may be met.

Referring a Hampshire child. For an urgent child protection concern, telephone the Hampshire Children's Reception Team professionals line on 01329 225379, then complete the online Inter-Agency Referral Form (IARF). For non-urgent concerns, complete the IARF. Out of hours, call 0300 555 1373. See Appendix 2.

Referring a Southampton child. Contact Southampton's Children's Resource Service (Appendix 2).

Council-referred pupils. Where the pupil was referred by Hampshire County Council, the DSL also tells the pupil's SEN case officer and the Council, as the contract requires. This must never delay an urgent referral.

7.3 Telling parents or carers

Parents and carers will normally be told about concerns and referrals, unless doing so could increase the risk, put a child or another person in danger, harm a police or social care investigation, or go against advice from statutory agencies. The reason for sharing or not sharing is recorded.

7.4 Escalation and professional challenge

- If the DSL does not act, is unavailable or is the subject of the concern, contact the Deputy DSL. If the Deputy DSL is also unavailable, does not act or is involved, the tutor must contact children's social care, the police or the LADO directly.
- If a referral is not accepted and the tutor or DSL is still worried, they will ask for reconsideration, use the local escalation procedure (for Hampshire children, the HSCP and HIPS escalation procedures) and keep acting in the child's best interests.
- Concerns must not be downgraded because tuition is online, the child seems 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 happen between children of any age or sex, within friendships or intimate relationships, in group sessions, private messages, social media or outside tuition. It may be a one-off or repeated and can cause serious harm.

8.1 Zero-tolerance approach

- All reports are taken seriously. Behaviour will never be dismissed as "banter", "part of growing up", "just a joke" or "boys being boys".
- No reports does not mean no abuse. Tutors stay 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.
- Children who cause harm may also have unmet needs and need support, without minimising the impact on the child who was harmed.

8.2 Response

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

The Behaviour and Anti-Bullying Policy sets out how we manage behaviour in lessons.

9. Online tutoring and digital safeguarding

Online tuition brings particular safeguarding risks. We reduce them through approved platforms, clear professional boundaries, parent and carer involvement, secure records and prompt action when concerns arise. The Tutor Code of Conduct sets out the standards every tutor must keep.

9.1 Required online practice

- Tutors use business-approved platforms, accounts and communication channels.
- Contact with a child outside lessons must be educational, necessary and through an approved channel. A parent, carer or the business should be included in messages wherever possible. Private social media contact is not allowed.
- Tutors must not add pupils as friends or followers, use disappearing messages, exchange personal photographs, make personal video calls or communicate in secret.
- Parent and tutor WhatsApp groups must include the parent or carer and 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 must not be visible.
- Children may keep cameras off where agreed. Camera use must never be forced. Concerns arising from anything 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 Online Tuition, Acceptable Use and Recording Policy, use informed consent and be stored securely.
- Tutors must not share meeting links publicly. Waiting rooms, passwords, host controls and restricted screen-sharing and chat 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 needed.
- 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 Notice.

9.2 Recordings and evidence

- Parents, carers and children must be told when a lesson is recorded and how the recording will be used, accessed, stored and deleted.
- Recordings do not replace live safeguarding practice and are not routinely reviewed unless there is a genuine educational, quality or safeguarding reason.
- Where a recording may contain evidence of abuse or a crime, it must be kept securely with access restricted. The DSL will ask the police or social care for advice before copying or sharing it.
- Intimate images of a child must never be printed, copied, forwarded or stored unnecessarily. Follow police and DSL instructions, and do not view 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 extra barriers to being safe. These can include difficulty recognising or reporting abuse, dependence on adults, isolation, being targeted online, and assumptions that signs of harm are caused by a condition or behaviour. Many of our Hampshire Council-referred pupils have SEND.

- 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 share concerns, including speech, chat, writing, visual prompts, breaks, extra processing time and support from a trusted adult where appropriate. See the Accessible Communication Policy.
- Reasonable adjustments are planned without lowering 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 are treated as safeguarding matters where appropriate.
- Read this section with the Equality, Diversity, Inclusion and SEND Policy.

11. Preventing radicalisation

Radicalisation is the process by which a person comes to support terrorism or extremist violence. Personal, family, social or online factors may make someone more vulnerable. There is no single sign, and concerns must be considered in context, without stereotyping or discrimination.

The statutory Prevent duty applies to specified authorities. As a private online tutoring agency, we adopt the relevant Prevent principles as safeguarding good practice and will co-operate with statutory agencies where concerns arise.

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

12. Allegations and low-level concerns about adults

All concerns about the conduct of a tutor, contractor, volunteer or other adult working with children are taken seriously and handled fairly, promptly and confidentially. This includes conduct at work, in another organisation, in private life or online that may affect their suitability. The standards expected of tutors are in the Tutor Code of Conduct.

12.1 Allegations that may meet the harm threshold

The LADO (Local Authority Designated Officer) must be told 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 suggests they may pose a risk of harm to children;
- behaved, or may have behaved, in a way that suggests they may not be suitable to work with children.

What happens:

- The concern must be reported to the DSL straight away. The DSL will contact the relevant LADO without delay, and within one working day, before starting any internal investigation.
- **Which LADO.** For a Hampshire child, including Council-referred pupils under the CS25116 contract, use the Hampshire LADO. Hampshire's LADO has no telephone line: use the Hampshire LADO Enquiry Form (online) if unsure, or the Hampshire LADO Notification Form, emailed to LADO@hants.gov.uk, to make a referral. For a Southampton child, or for allegations connected to the business as a Southampton-based provider, use the Southampton LADO. For a child elsewhere, use the LADO for the child's area. If unsure, ask either LADO for advice. Contacts are in Appendix 2.
- **If the allegation is about Steffi Hesketh-Spells,** or there is a conflict of interest, report it to the Deputy DSL, Shim Amin (via the business email), who will refer it to the LADO. If you would prefer Steffi not to see your report, contact the LADO or children's social care directly. If the allegation is about the Deputy DSL, report it to the DSL.
- Immediate steps may include protecting the child, keeping evidence, restricting systems or contact with pupils, and asking the police or LADO for advice. Pausing a tutor's work is not automatic and is considered proportionately.
- For Council-referred pupils, the Council is told as the contract requires.
- Parents, carers and the adult concerned will be told at an appropriate time, in line with LADO and police advice. Confidentiality is kept as far as possible.
- We will consider referrals to the DBS and the Teaching Regulation Agency where the 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 that does not match the Tutor Code of Conduct, but which does not appear to meet the harm threshold. Examples include over-familiarity, favouritism, inappropriate messages, sexualised language, taking unauthorised images, sharing personal information, secret contact or failing to report a boundary breach.

- Low-level concerns, including self-reports, must be shared with the DSL promptly.
- The DSL will record and review concerns, look for 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 meant or did not cause visible harm.
- Records are handled confidentially and kept in line 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.
- We will seek consent where appropriate, but may share without consent where there is a lawful safeguarding reason, where asking for 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 shared and with whom, unless this would be unsafe or harm an investigation.
- The decision to share or not share, the information considered and the reasons are recorded.

13.2 Safeguarding records

- Safeguarding records are factual, dated and signed. They are kept 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 with appropriate access controls, encryption and secure backups. Safeguarding information must not be kept only on a tutor's personal device.
- Records are transferred securely where another organisation needs them to protect the child, and a copy or transfer log is kept as appropriate.
- Records are normally kept until the child's 25th birthday, or longer where statutory agencies, insurers or legal advisers advise. Retention is reviewed and information is not kept longer than necessary.
- Any data breach involving safeguarding information must be reported to the DSL straight away and handled under the Personal Data Breach Procedure.

14. Supporting children, families and tutors

- The child's safety, dignity, voice and continued access to education stay central to every decision.
- We will make reasonable adjustments and consider whether a different tutor, lesson format, communication method, pause or extra support is needed.

- Parents and carers are treated with respect and kept informed where safe, but we will not mediate or investigate allegations that need statutory involvement.
- Tutors who receive a disclosure may be affected by what they hear. The DSL or Deputy DSL will offer a debrief, practical guidance and signposting, while keeping confidentiality.
- A person who is the subject of 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 anyone working with us must raise concerns about unsafe practice, failures to follow this policy, concerns being covered up or poor safeguarding action. Our **Whistleblowing Policy** sets out in full how to raise a concern, how it will be handled and the protection available. In summary:

- Concerns should normally be raised with the DSL. If that is not appropriate, or the concern is about the DSL, raise it with the Deputy DSL, Shim Amin.
- If internal routes are not appropriate or do not work, contact the LADO (Hampshire or Southampton, as set out in Appendix 2), children's social care, the police, the NSPCC Whistleblowing Advice Line (0800 028 0285) or Ofsted (0300 123 3155, whistleblowing@ofsted.gov.uk).
- For concerns about Council-referred pupils, Hampshire County Council can also be told.
- 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 dealt with under contractual procedures, but a concern that is not proven is not automatically malicious.

15.2 Complaints

A complaint about tuition quality, administration or service is 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 person complaining will be told that the matter has moved to the safeguarding route, where this is appropriate and safe.

16. Monitoring, review and linked policies

16.1 Monitoring and quality assurance

- The DSL reviews safeguarding records, patterns, response times, referrals, allegations, low-level concerns, complaints, training and safer recruitment.
- Learning from incidents, referrals, complaints, statutory advice and safeguarding reviews is used to improve our systems and training.
- We may check approved communication channels, lesson records or platform settings where proportionate and in line with our privacy notices.
- Safeguarding is considered before introducing new platforms, AI tools, group formats, international services or recording practices.
- For Council-referred pupils, we take part in Hampshire County Council quality assurance and monitoring.

16.2 Review cycle

- This policy is formally reviewed at least once a year.
- It is updated sooner after a safeguarding incident, complaint, local learning review, change to how we work, new technology, or new statutory guidance or legislation.
- This version has been reviewed against KCSIE 2026, in force from 1 September 2026.
- Contact details in Appendix 2 are checked against the official council and safeguarding partnership websites at each review.
- The current approved version is made available to tutors, parents and carers, and important changes are communicated.

16.3 Linked policies and procedures

- Tutor Code of Conduct (new, November 2026)
- Whistleblowing Policy (new, November 2026)
- Online Tuition, Acceptable Use and Recording Policy
- Safer Recruitment and Tutor Vetting Statement
- Behaviour and Anti-Bullying Policy
- Attendance Policy
- Health and Safety Policy (including Lone Working)
- Anti-Bribery, Gifts and Hospitality Policy
- Accessible Communication Policy
- Equality, Diversity, Inclusion and SEND Policy
- Complaints Policy
- Privacy Notice and Cookies Policy
- Personal Data Breach Procedure
- Parent and Carer Terms and Conditions

Publication and implementation

- This public version is available to parents, carers, pupils and tutors on our website.
- Tutors receive separate secure reporting instructions and must confirm they have read this policy, the Tutor Code of Conduct and the Whistleblowing Policy.
- Urgent concerns must be reported by telephone. Sensitive details must not be sent by ordinary WhatsApp or unsecured email.

Appendix 1: Safeguarding concern record

Complete as soon as possible. For urgent concerns, telephone the DSL (or Deputy DSL) or the emergency services first. Do not email sensitive information unless you use an approved secure method.

Item	**Details**
Child or pupil name	
Date of birth, age and year group	
Home address, country and local authority (for example Hampshire, Southampton, other)	
Hampshire County Council referred pupil? (Yes / No; pupil reference)	
Parent or carer name and contact	
Tutor or person reporting	
Date and time the concern arose	
Lesson or platform, and who was present	
Immediate danger? Emergency action taken?	
Factual account of the concern or disclosure. Use the child's exact words and say what was seen, heard or reported.	
Questions asked and the child's response	

Item	Details
Immediate action taken, including people contacted and times	

Reporter signature: _____. Date and time submitted: _____.

DSL decision and action record

Item	Details
Risk assessment, threshold considered and advice obtained	
Referral or action taken, agency and contact, date, time and outcome	
Hampshire County Council and SEN case officer told (Council-referred pupils): date and time	
Parent or carer told? If not, record why. Child's wishes, and feedback given.	
Follow-up actions, person responsible and review date	

DSL or Deputy DSL signature: _____. Date and time: _____.

Appendix 2: Key safeguarding contacts

Emergency

Situation	Contact
Immediate danger or crime in progress	999
Police non-emergency	101

Business contacts

Role	Contact
Designated Safeguarding Lead (DSL)	Steffi Hesketh-Spells, 07802 828910, steffiheskethtutoring@gmail.com
Deputy DSL	Shim Amin, contactable via the business email (steffiheskethtutoring@gmail.com)
If neither is available, or the concern is about them	Contact children's social care, the police or the LADO directly (below)

Hampshire: concerns about a child

For children who live in the Hampshire County Council area, including pupils referred by Hampshire County Council.

Service	Contact
Children's Reception Team (CRT) – professionals' line for urgent child protection enquiries	01329 225379. Follow up with the online Inter-Agency Referral Form (IARF).
Non-urgent professional referrals	Online Inter-Agency Referral Form (IARF), via hants.gov.uk or the HSCP "Report a concern" page
Children's Services – members of the public and parents (office hours: 8:30am to 5pm Monday to Thursday, 8:30am to 4:30pm Friday)	0300 555 1384, or the online safeguarding form at hants.gov.uk
Out of hours (evenings, nights, weekends and bank holidays)	0300 555 1373
Online information	Hampshire County Council – Safeguarding children and young people: www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren

Hampshire LADO: concerns about an adult working with children

Item	Details
How to contact	The Hampshire LADO no longer has a telephone line. Do not email individual LADOs for new advice or referrals.
Not sure if the threshold is met	Complete the online Hampshire LADO Enquiry Form. The duty LADO will review it and give advice.
To make a referral	Complete the Hampshire LADO Notification Form and email it to LADO@hants.gov.uk
Forms and guidance	Allegations Against People in the Children's Workforce: www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/allegations
Timescale	The LADO should be told within one working day of an allegation coming to our attention

Hampshire Safeguarding Children Partnership (HSCP) and procedures

Item	Details
HSCP website	www.hampshirescp.org.uk (Report a concern: www.hampshirescp.org.uk/report-a-concern/)
HSCP contact	01962 876355, hscp@hants.gov.uk
Safeguarding procedures	Hampshire, Isle of Wight, Portsmouth and Southampton (HIPS) procedures: hipsprocedures.org.uk, including "Allegations Against People Who Work with Children" and the escalation procedure
Thresholds	Hampshire and Isle of Wight Safeguarding Children Partnerships and Children's Trust Thresholds Chart (on the HSCP website)

Southampton: concerns about a child

Use these contacts only where Southampton City Council is the child's local authority.

Service	Contact
Children's Resource Service – professionals (office hours)	023 8083 2300
Children's Resource Service – public and parents (office hours)	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

Southampton LADO: concerns about an adult working with children

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

Other areas

For a child who lives elsewhere in the UK, contact the children's services team and LADO for the area where the child lives or is physically located. Portsmouth and the Isle of Wight have their own children's services; their contacts are listed on the HSCP "Report a concern" page.

National support and whistleblowing

Service	Contact
NSPCC Helpline	0808 800 5000, help@nspcc.org.uk
NSPCC Whistleblowing Advice Line	0800 028 0285, help@nspcc.org.uk
Ofsted whistleblowing hotline	0300 123 3155, whistleblowing@ofsted.gov.uk
Childline	0800 1111
Prevent training	support-people-susceptible-to-radicalisation.service.gov.uk/portal

Pupils outside the UK

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

Appendix 3: Reporting flowchart

1. **Concern arises or a child discloses.** Listen, take it 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 tell the DSL. No: go to step 3.
3. **Record.** Write a factual, dated account straight away. Keep relevant digital evidence without forwarding intimate images.
4. **Report.** Telephone the DSL for urgent concerns (or the Deputy DSL if the DSL cannot be reached). Submit the secure concern record the same day.
5. **DSL assesses and acts.** Identify the child's location and local authority (Hampshire, Southampton or elsewhere). Consider early help, children's social care, the police, Prevent or Channel, the LADO or another referral. For Council-referred pupils, also tell the Council.
6. **Follow up and escalate.** If no action is taken, the DSL and Deputy DSL are unavailable or involved, or the concern remains, contact statutory services directly and use the local escalation procedures.
7. **Record the outcome and review.** Record decisions, advice, communication with parents, the child's wishes, actions, outcome and review date.

Appendix 4: Reference documents

The following sources were used to prepare this policy. Website content and contact details are checked at each review. Hampshire contact details were checked on hants.gov.uk and hampshirescp.org.uk in November 2026.

- Keeping children safe in out-of-school settings: https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice
- Working Together to Safeguard Children: 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: 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
- Hampshire County Council – Safeguarding children and young people: https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren
- Hampshire County Council – Allegations Against People in the Children's Workforce (LADO): https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/allegations
- Hampshire County Council – Multi-Agency Safeguarding Hub (MASH): https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/childprotection/mash
- Hampshire Safeguarding Children Partnership – Report a concern: https://www.hampshirescp.org.uk/report-a-concern/
- HIPS safeguarding procedures: https://hipsprocedures.org.uk/
- 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: 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/

- NSPCC Whistleblowing Advice Line: https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/
- Ofsted whistleblowing: https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies