The Tutor Trust Safeguarding Policy

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Introduction

The Tutor Trust is a charity created for the benefit of improving children's educational attainment. Its core activity is providing tutors for one to one and small group tuition to young people, remotely in schools/colleges or at home and in appropriate environments such as care homes. The Tutor Trust believes that all children and young people have the right to learn in a safe and caring environment. This includes the right to protection from all types of abuse. Trustees, Tutor Trust officers, tutors and those in a position of trust who represent The Tutor Trust, must do everything possible to foster these rights. To do this, certain protections need to be in place to safeguard children, as well as those who work with them. The Tutor Trust takes seriously its responsibility towards safeguarding all children who engage with the charity, with the focus being on their safety and welfare.

This policy is guided and referenced against the DfE's publication *'Keeping Children Safe in Education 2026'* and the '*NSPCC Website August 2026'*

The Tutor Trust is a charity that primarily works with children under the age of 18, and as such is legally required to have a Safeguarding Policy.

Who does The Tutor Trust Safeguarding Policy apply to?

Safeguarding and promoting the welfare of children applies to trustees and everyone who is employed by or delivering The Tutor Trust services. These include trustees, employees (full time and part time), tutors, volunteers, interns and contractors. Tutor Trust services can be delivered in-person or remotely online.

The Tutor Trust Safeguarding Policy is available to all who represent The Tutor

Trust, who will be required to familiarise themselves with it.

In addition, when The Tutor Trust enters a partnership with another organisation relating to work with young people, the partner will be required to observe The Tutor Trust's Safeguarding Policy and any relevant guidance, and in turn, The Tutor Trust will receive a copy of the partner's policies.

Legal framework and related policies and procedures

This policy is complementary to several existing organisational policies and practices mentioned below. In general, where any reference is made to the physical world in these documents, this will apply in the same way in the online world, or as near to it as is reasonably foreseeable and possible.

- *Keeping Children Safe in Education 2026 Part 1 (as a minimum)*
- *The Tutor Trust Safer Recruitment Policy*
- *The Tutor Trust DBS Policy*
- *The Tutor Trust Complaints Policy*
- *The Tutor Trust Whistleblowing Policy*
- *The Tutor Trust Guidance on Conduct and Behaviour – For Staff*
- *The Tutor Trust Guidance on Conduct and Behaviour – For Tutors*
- *The Tutor Trust Remote Tuition Safeguarding Guidance*

The following legislation informs and guides this Safeguarding policy, and the related organisational policies listed above:

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children, 2026
- The Human Rights Act 1989
- The Children Act 1989 & 2004
- The Children and Social Work Act 2017

- Data Protection Act 2018
- The Mental Capacity Act 2005
- Guidance for Safer Working Practice for those working with children and young people in education settings (GSWP), May 2019 and the annexe issued in 2020
- The Domestic Abuse Act 2021
- Safeguarding Vulnerable Groups Act 2006
- Mandatory reporting of female genital mutilation (FGM) (Home office 2016)
- What to do if you're worried a child is being abuse: advice for practitioners. (DfE, 2015)
- Equality Act 2010
- Mental Health and behaviour in schools (DfE) 2018

Scope and Purpose of the Policy

General principles

The Tutor Trust acknowledges it has a responsibility for the safety of children receiving our services. It also recognises that good safeguarding policies and procedures are of benefit to everyone involved with our work, including staff, as they can help protect them from erroneous or malicious allegations.

All individuals who represent The Tutor Trust at all levels, must read and understand the following documents:

- *Keeping Children Safe in Education 2026 Part 1 (as a minimum)*
- *The Tutor Trust Safer Recruitment Policy*
- *The Tutor Trust Whistleblowing Policy*
- *Tutor Trust Guidance on Conduct and Behaviour – For Staff (not relevant for tutors)*

- *Tutor Trust Guidance on Conduct and Behaviour – For Tutors (for tutors)*
- *Tutor Trust Remote Tuition Safeguarding Guidance*

The purpose of The Tutor Trust Safeguarding Policy is to establish an environment in which the children with whom The Tutor Trust personnel come into direct or indirect contact are protected from abuse, are safe and are treated with dignity, and to create an atmosphere in which children feel able to discuss openly any concerns they may have or any circumstances which may constitute abuse.

The Safeguarding Policy seeks to achieve this by setting out a series of behavioural guidelines and a management structure to implement the policy.

The Tutor Trust is committed to providing a safe environment for children:

- The child's welfare is paramount.
- All children whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity, have the right to protection from abuse.
- All suspicions and allegations of inappropriate behaviour will be taken seriously and responded to swiftly and appropriately.
- As defined in '*Keeping Children Safe in Education 2026*', anyone under the age of 18 years is considered to be a child.

The Tutor Trust is committed to practices which promote the welfare of children and protect children from harm. The Tutor Trust acknowledges that representatives of the organisation deliver tuition to some of the most vulnerable children in society. The Tutor Trust provides additional training and support to

tutors, when delivering tuition to children under these circumstances.

All staff who have supervised or unsupervised access to or contact with children are required to:

- Recognise and accept their responsibilities.
- Develop awareness of the issues which can cause children harm, such as the impact of Mental Health issues, as documented in '*Keeping Children Safe in Education 2026'.*
- Report concerns following the procedures laid out within this policy.

The Tutor Trust will endeavour to safeguard children by:

- Reporting concerns to the appropriate authorities.
- Ensuring that safeguarding and child protection is promoted throughout the organisation. This is supported by placing safeguarding as a fixed item on the agenda of important meetings such as every Trustee Meeting, Finance and Risk Committee meeting, Quality and Impact meeting, Recruitment and Development meetings and every Partnership Operations meeting.
- Carefully following procedures for recruitment and selection of staff, tutors and trustees.
- Providing effective management for staff, tutors and trustees through support and regular training.

The Tutor Trust is also committed to reviewing its Safeguarding Policy and associated guidance policies and procedures at regular intervals.

It is The Tutor Trust's policy that:

- Everybody representing The Tutor Trust accepts their responsibility to promote the welfare of children who come into contact with The Tutor

- Trust in connection with its tasks and functions, and that they will report any concerns about a child or somebody else's behaviour, using the procedures laid down.
- There is a Designated Safeguarding Lead (DSL), two Trustees responsible for safeguarding and four Deputy DSL's (to act in the absence of the DSL) within The Tutor Trust, who will take action following any expression of concern. The lines of responsibility in respect of child protection are clear.
- The DSL, trustees and their deputies know how to make appropriate referrals to statutory child protection agencies.
- All those who represent The Tutor Trust should read as a minimum '*Keeping Children Safe in Education 2026 Part 1*', '*Tutor Trust Guidance on Conduct and Behaviour – For Tutors*' or Tutor Trust Guidance on Conduct and Behaviour – *For Staff* and '*Tutor Trust Remote Tuition Safeguarding Guidance*'
- Information relating to any allegation or disclosure will be clearly recorded as soon as possible, and there is a procedure setting out who should record information and the timescales for passing it on.
- The Children Act 2004 states that "everyone has a duty to co-operate to improve the well-being of the children". This means that considerations of
- confidentiality which might apply to other situations should not be allowed to over-ride the right of children to be protected from harm.
- The Tutor Trust's Safeguarding Policy will be referred to or included in recruitment, training, moderation and policy materials where appropriate, and the policies are openly and widely available to staff and actively promoted within the organisation.
- A culture of mutual respect between children and those who represent The Tutor Trust in all its activities will be encouraged, with adults

modelling good practice in this context.

- All staff, trustees and anyone in paid or unpaid work on behalf of The Tutor Trust with supervised and unsupervised access to children will be vetted appropriately as part of Safer Recruitment.
- It is part of The Tutor Trust's acceptance of its responsibility of duty of care towards children, that anybody who encounters child protection concerns in the context of their work on behalf of The Tutor Trust will be supported when they report their concerns in good faith.

Conduct and Behaviour (Code of Conduct)

For further guidance on in-person and online conduct and behaviour please read '*Tutor Trust Guidance on Conduct and Behaviour – For Tutors*' or '*Tutor Trust Guidance on Conduct and Behaviour – For Staff*' and '*Tutor Trust Remote Tuition Safeguarding Guidance'. G*uidance has been taken from *Keeping Children Safe in Education 2026*. A copy of all relevant documents are available on the tutor platform 'Thinqi' that can be found within the Tutor Hub and shared with every Tutor during their training. Copies are also available to staff and volunteers on The Tutor Trust shared drive.

Roles and Responsibilities

Designated Safeguarding Lead (DSL)

The Tutor Trust has appointed a Designated Safeguarding Lead (DSL) who is responsible for dealing with any concerns about the protection of children. At The Tutor Trust this person is the Chief Operating Officer. The Tutor Trust provides '*additional time'* to enable the DSL to '*take a lead and responsibility to ensure they respond to children's needs',* this is outlined within the COO's job description. The DSL is Safeguarding Level 3 trained (renewed every two years)

and has completed Prevent Training.

Deputy Designated Safeguarding Leads

There are four Deputy DSL's who will become responsible in their absence and will be trained to the same level as the DSL. One of the Tutor Trust's Deputy DSL's oversees work involving extremely vulnerable children (those in Alternative Provision and Looked After Children), this person is the Director of Tutoring Plus. The Director of Tutoring Plus has also received DSL training and has a wealth of experience in this field. The Deputy DSL's are Safeguarding Level 3 trained (renewed every two years) and have completed Prevent Training.

There are two Trustees responsible for overseeing safeguarding within The Tutor Trust, they are Lucy Crompton and Helen Pratten. Lucy and Helen are also required to complete the DSL Level 3 Training, their training is updated every two years.

The role of the DSL is to:

1. Know which outside child protection agency to contact in the event of a child protection concern coming to the notice of The Tutor Trust.
2. Provide, promote, inform and advise on safeguarding and child protection within The Tutor Trust and provide regular updates.
3. Ensure that appropriate information is available at the time of referral and that the referral is confirmed in writing under confidential cover.
4. Ensure that the appropriate legislative body such as Police, LADO, Social Services or Barring list is notified of a referral in a timely manner.
5. Ensure that any confidential data is stored safely and securely, in line with all Data Protection policies and procedures.
6. Keep relevant people within The Tutor Trust, such as the trustees responsible for safeguarding, informed about any action taken and any

7. further action required; for example, disciplinary action against a member of staff.
8. Advise all Tutor Trust stakeholders of safeguarding and child protection training needs.
9. Review the operation of the Safeguarding Policy alongside the trustees responsible for safeguarding regularly to review procedures and introduce best practice.
10. The DSL, deputy DSL's and trustees must be appropriately trained and must advise relevant stakeholders within the organisation of any significant legislation changes, that may affect The Tutor Trust's activities.
11. Ensure the staff behaviour policy specifically covers acceptable use of technologies, including the use of mobile devices (statutory guidance states that schools should be mobile phone-free environments as default), tutor/staff/pupil relationships and communications, including the use of social media.
12. The DSL must have an understanding of filtering and monitoring systems.
13. In the DSL's absence, the deputies will carry out DSL duties by following all outlined procedures.

Reporting and Referral Process

Staff, trustees or tutors could have their suspicion or concern raised in a number of ways, the most likely but not exhaustive of which are:

1. The conduct of a member of The Tutor Trust's staff or tutor.
2. A child "disclosing" abuse.
3. Bruising or evidence of physical hurt.
4. Unusual behaviour by a child.
5. Overhearing a child's conversation with another child.

Where a tutor who is working on behalf of The Tutor Trust has a concern whilst providing tuition in a school, online, care home or any other place of tuition that has been arranged by The Tutor Trust, the tutor must contact in the first instance the Designated Safeguarding Lead (or equivalent) at the relevant location. The information for who to inform is supplied before tuition begins, at the Introductory Meeting, which involves both the school (or equivalent) and a Tutor Trust representative. Tutors will be guided by the setting's Safeguarding/Child Protection policies. The Tutor must then inform The Tutor Trust's DSL in the following way:

- Concerns about a specific child should be reported immediately in person or by telephone to The Tutor Trust's DSL and confirmed in writing. Delay could prejudice the welfare of a child.
    - Responding to low-level concerns – the information collected by the DSL will help them to categorise the type of behaviour and determine what further action may need to be taken.
    - All safeguarding concerns (and outcomes) are logged and recorded on a central, encrypted safeguarding log.

- If the concerns relate to the conduct of a member of staff or tutor these should be reported in person or by phone to The Tutor Trust's DSL immediately. If the concern is about the DSL, then report to one of the Deputy DSL's. Steps will be taken to fully support anyone who in good faith reports his or her concerns about a colleague and every effort will be made to maintain confidentiality for all parties whilst the allegation is considered. The Tutor Trust DSL will contact the trustees responsible for safeguarding and all will consider the report and either refer this

immediately to the authorities or, after taking appropriate advice, decide not to refer the concerns to the authorities but keep a full record of the concerns.

    - Please refer to the enclosed flowchart on how to report.

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the Tutor Trust's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team. *The Tutor Trust Complaints Policy* and *The Tutor Trust Whistleblowing Policy* are in place and can be found on The Tutor Trust website, to provide guidance for such concerns to be raised with the senior leadership team.

Where a staff member feels unable to raise an issue with The Tutor Trust or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them: Staff or tutors can call the NSPCC on 0800 028 0285 (line is available from 8:00 AM to 8:00 PM, Monday to Friday) and email them at help@nspcc.org.uk. The Tutor Trust's Whistleblowing Policy will also be able to guide a staff member's response.

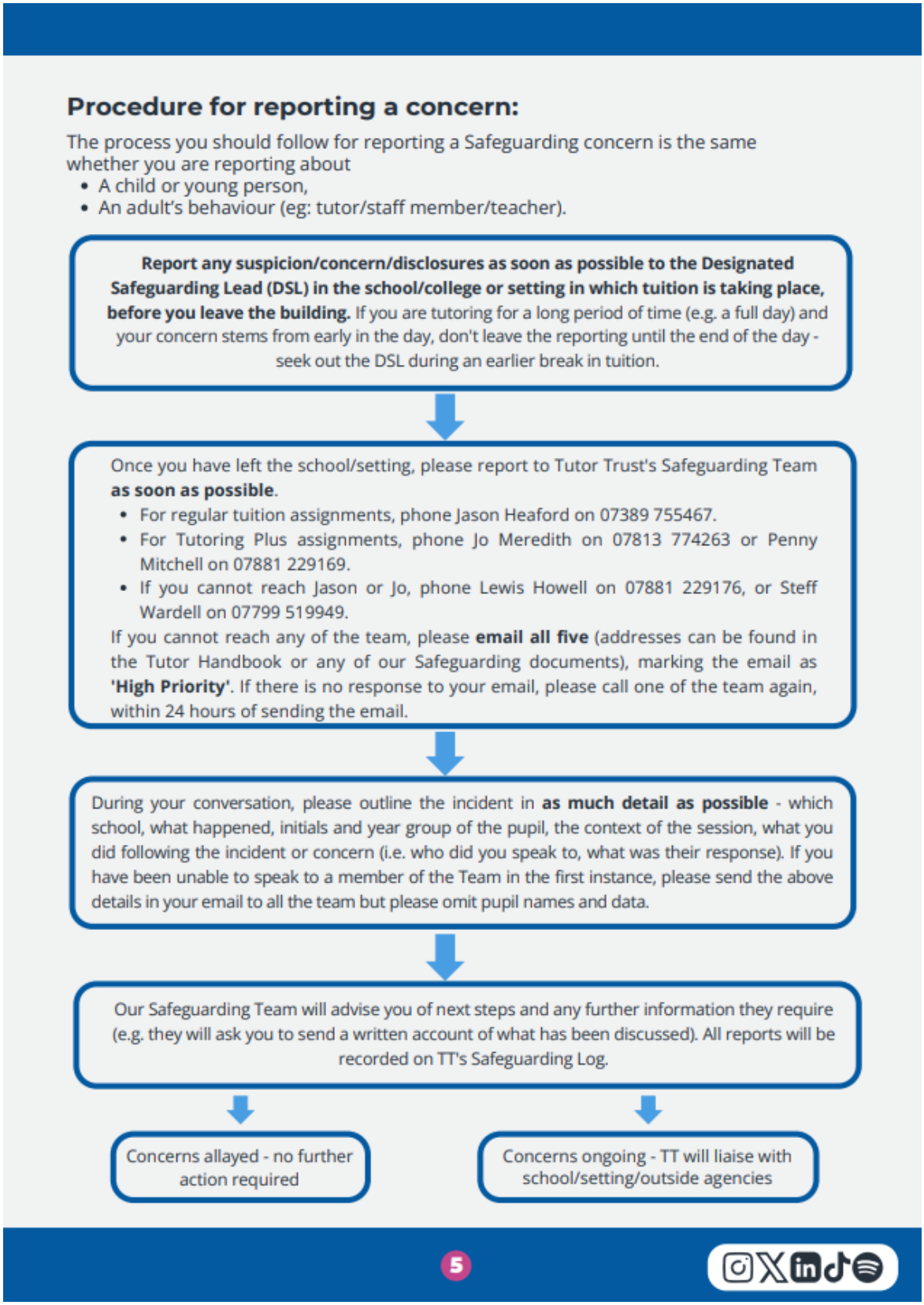
Any tutor under investigation for safeguarding concerns will have their current assignment ended, and further work will not be provided until the allegation has been resolved. This is to ensure the safeguarding of both tutors and tutees.

Referrals are made to the DBS when The Tutor Trust has concerns that a person has caused harm or poses a future risk of harm to children. The DBS will consider cases that concern safeguarding matters (i.e. harm or the risk of harm to a child), barring individuals from working with children where appropriate.

The Safeguarding Vulnerable Groups Act 2006 (SVGA) places a legal duty to refer any person to the Disclosure and Barring Service (DBS) who has:

- Harmed or poses a risk of harm to a child or vulnerable adult
- Satisfied the harm test (i.e. no action or inaction occurred but the present risk that it could was significant) or;
- Received a caution or conviction for a relevant offence

The flowchart below demonstrates the reporting process when receiving a safeguarding concern:



Responding Appropriately to a Child Making an Allegation of Abuse

1. Stay calm.
2. Listen carefully to what is said.
3. Find an appropriate early opportunity to explain that that the information will need to be shared with others – do not promise to keep secrets.
4. Tell the child that the matter will only be disclosed to those who need to know about it.
5. Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer.
6. Reassure the child that they have done the right thing in telling you.
7. Tell them what you will do next, and with whom the information will be shared.
8. Record in writing what was said, using the child's own words, as soon as possible – note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated.
9. It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. That is a task for the professional child protection agencies, following a referral from the Designated Safeguarding Lead within the organisation.
10. Report to the setting's Designated Safeguarding Lead (or equivalent) as soon as is practically possible.
11. Report concern to The Tutor Trust's DSL as soon as is practically possible when you've left the setting.

Safeguarding Training

Trustees

The Tutor Trust will ensure that all trustees receive appropriate safeguarding and child protection training at induction. The training will equip them with the knowledge to provide strategic challenge, to test and assure themselves that the safeguarding policies and procedures in place at The Tutor Trust are effective and support the delivery of a robust, whole organisation, approach to safeguarding. The training will be regularly updated.

Staff

The Tutor Trust ensures that all new staff undergo safeguarding and child protection training at induction. Training is updated regularly. In addition, all staff receive regular safeguarding and child protection updates (for example, via email, at every staff/trustee meeting) as required, and at least annually. The Tutor Trust provides them with relevant skills and knowledge to safeguard children effectively. The Tutor Trust uses the expertise of staff by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunities are provided for staff to contribute to and shape child protection arrangements and the Safeguarding policy. All staff who represent The Tutor Trust must read, in addition to this policy, '*Keeping Children Safe in Education 2026 Part 1*', '*The Tutor Trust Guidance on Conduct and Behaviour – For Staff*' and ' *Tutor Trust Remote Tuition Safeguarding Guidance'.*

All staff involved in the recruitment and placement process for roles involving children must be given dedicated and relevant safer recruitment training, to include:

- What is safeguarding

- Pre-employment checks
- How to identify a potential safeguarding matter
- Their responsibilities
- Reporting process
- High risk & escalation process

Tutors

The Tutor Trust ensures that tutors have undertaken and completed the relevant training prior to placement in their role. This must cover as a minimum:

- Safeguarding and Child Protection – tutors complete training supplied by TES/Educare, which also covers radicalisation, extremism and Prevent Duty.
- Prevent Duty - This must be completed in addition to the requirements set out in the Safer recruitment policies within Keeping Children Safe in Education mandatory guidance, as set out further in this document.
- Annual refresher training is compulsory for all returning tutors, the training incorporates all relevant changes to KCSIE for that academic year.

Safeguarding definitions

The definition of the term 'safeguarding' as derived in this policy is taken from statutory guidance.

Safeguarding children is defined as:

- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of children's mental and physical health or development.

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Definitions of the four categories of abuse:

1. Physical abuse - a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
2. Sexual child abuse - involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. Activities may involve physical contact or non-penetrative acts. Can take place online and technology can be used to facilitate abuse. Sexual abuse of children by other children and women is possible, it is not solely perpetrated by adult males (Rape, molestation, child pornography production and possession, masturbation, kissing,

rubbing, grooming, encouraging children to behave in sexually inappropriate ways).

3. Neglect - the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development (Physical neglect, educational neglect, and emotional neglect).
4. Emotional abuse - the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone (verbal, mental, or psychological abuse).

The signs of child abuse aren't always obvious, and a child may not be ready or able to disclose abuse (they may feel embarrassed or humiliated or are being threatened). Sometimes, children don't even realise that what's happening to them is abuse. That should not prevent staff or tutors from speaking to the DSL if they have concerns.

Some common indicators that there may be something concerning happening in a child's life include:

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious or depressed
- becoming uncharacteristically aggressive
- physical marks/injuries (burns, scars, fractures)
- lacks social skills and has few friends if any
- poor bond or relationship with a parent

- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body
- malnutrition or unexplained weight loss

These signs don't necessarily mean that a child is being abused, (there could be other things happening in their life which are affecting their behaviour) but they should be monitored and any concerns reported. There may also be some concerning behaviour from adults who have children in their care, which raises concerns for the child/children's safety and wellbeing.

Key topics given greater emphasis in *recent KCSiE updates* include Domestic abuse (and the Domestic Abuse Act 2021), Child-on-Child abuse, Serious Violence, 'Honour', faith- or belief-based abuse, children questioning their gender and AI and online safety:

Domestic Abuse (excerpt take from *'Keeping Children Safe in Education 2026')*

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse, and are related to either victim or perpetrator of the abuse, or either the victim or perpetrator of the abuse has parental responsibility for that child. The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, sexual, emotional and economic abuse and coercive and controlling behaviour. It may be a single incident or a pattern of incidents.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can be victims of domestic abuse – they may witness, and be adversely affected by, domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and their health, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'

Child-on-Child Abuse (including harassment and violence) (excerpt take from *'Keeping Children Safe in Education 2026')*

Children can abuse other children (often referred to as child-on-child abuse) and it can take many forms. It can happen both inside and outside of school and online. It is important that all staff and tutors recognise the indicators and signs of child-on-child abuse (including harassment and violence) and know how to identify it and respond to reports. This can include (but is not limited to): bullying

(including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse'); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse, and threat of harm with a weapon is also included); sexual violence and sexual harassment; consensual and non-consensual making and sharing of nude and semi-nude images and/or videos (including those generated using AI); causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting (which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm) and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
Child-on-Child abuse (including harassment and violence) is a safeguarding issue for both the victim and the alleged perpetrator.

Serious Violence and Child Criminal Exploitation (CCE) (excerpt take from *'Keeping Children Safe in Education 2026')*

Tutors should be aware of the indicators which may signal children are at risk from, or are involved with, serious violent crime; increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs (including country lines) and may be at risk of criminal exploitation. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

'Honour', faith- or belief-based abuse (including Female Genital Mutilation and Forced Marriage) (excerpt take from *'Keeping Children Safe in Education 2026')*

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the

community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

Children questioning their gender (excerpt take from *'Keeping Children Safe in Education 2026')*

In recent years, we have seen a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society. It is not for schools and colleges to initiate any action in this area; guidance is focused on circumstances where a child or their parent has raised a request relating to social transition

Schools and colleges should take time to understand the thoughts and feelings of children who are questioning their gender and should be appropriately professionally curious about the full range of the child's experiences. Schools and colleges should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

A key change that may impact on the tutoring environment prevents children from using toilets designated for the opposite biological sex.

Online Safety (excerpt take from *'Keeping Children Safe in Education 2026')*

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:
content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Definitions of the ten categories of abuse, including signs and symptoms relevant to children and adults as per statutory guidance:

1. Physical abuse
2. Domestic violence or abuse
3. Sexual abuse
4. Psychological or emotional abuse
5. Financial or material abuse
6. Modern slavery
7. Discriminatory abuse
8. Organisational or institutional abuse
9. Neglect or acts of omission
10. Self-neglect

The terms 'victim' and 'perpetrator' are widely recognised and understood but it is important to recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, Tutor Trust staff and tutors should be conscious of this when managing any incident and be prepared to use any term with which the individual

child is most comfortable. In some instances, the abusive behaviour will have been harmful to the perpetrator as well so it is important to think about terminology, particularly when speaking in front of children.

Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, it is important for The Tutor Trust to recognise the importance of information sharing between practitioners and local agencies. The Tutor Trust is proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

The Tutor Trust is aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

The Data Protection Act 2018 and GDPR do not prevent the sharing of

information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Further details regarding Information Sharing and Data Protection are held within The Tutor Trust Data Protection Policy and Privacy Notices. They are available to staff, tutors and trustees at all times.

Safer Recruitment

This procedure sets out The Tutor Trust's requirements in respect of carrying out criminal records (DBS Disclosure) checks, checks against the DBS Children's Barred Lists, and a breakdown of the administrative arrangements made to ensure that these checks are carried out in accordance with relevant legislation and the DBS Code of Practice for Registered Bodies:

- All employees, volunteers and trustees who have potential contact, face to face or online, with children must have an up-to-date enhanced DBS check, which is processed by an authorised company and needs to be renewed annually. (Please refer to the Tutor Trust DBS Policy).
- Single Central Record – The Tutor Trust keeps a single central record of checks in line with instructions contained in the DfE guidance. A Single Central Record is kept to meet the requirements of the DBS and Safeguarding Policies, detailing all staff with contracts, volunteers, tutors and trustees who have contact with children.
- Storage & Access – The Tutor Trust does not permit the retention of Disclosure information on applicant's personnel files. It is accepted that under no circumstances will The Tutor Trust be sent or take a copy of any disclosure information. DBS information is viewed directly by the Designated Safeguarding Lead (DSL) and other authorised staff members only.
- Handling - This information will be dealt with in strict confidentiality and conveyed to no other person. It is recognised that it is a criminal offence to convey information of this nature to any other person not entitled to receive it.

- Usage - DBS information is only to be used for the purpose of assessing an applicant's suitability for a role at The Tutor Trust.

The Tutor Trust's onboarding, recruitment, compliance and safeguarding processes must align to Safer Recruitment policies, as outlined in '*Keeping Children Safe in Education 2026*' guidance, including the following checks:

- During the shortlisting process, Tutor Trust may carry out an online search as part of due diligence on the shortlisted candidates, and candidates will be informed of this possibility – this may help to identify incidents or issues that have happened, and are publicly available online, which can be explored at interview.
- All staff, trustees and tutors are interviewed by a minimum of two Tutor Trust staff (trained in Safer Recruitment) with a full working history confirmed accounting for any gaps in employment.
- When applying for a role, standalone CV's are not accepted – all candidates must fill in a full application form, to provide adequate information.
- Identity checks completed including eligibility to work, photo ID, and proof of residence and RTW in the UK.
- A medical self - assessment questionnaire is completed with the candidate to ensure they are fit to work.
- Qualification & QTS status checked and confirmed.
- UK Prohibition/interim probation checks and Section 128 (where applicable) completed before placement and re-checked annually for restrictions.

- Barred list check completed as part of enhanced DBS check. Update service check validated to include barred list. These checks are completed annually.
- DBS update service or a new DBS issued within the last 12 months ensuring DBS Safeguarding guidelines are met. Re-checked after any 3-month break in service.
- In addition to the requirements above and below, candidates who have worked or lived in another country for a recent substantial period must provide a police check or certificate of good conduct where possible.
- All candidates are stringently reference checked with a minimum of two recent references covering a substantial period, one of which is required to be the candidate's most recent or current employer.
- Where a candidate is not currently working with children a reference is also gained from the employer where the candidate was working with children.
- All tutors must have read Part One of *Keeping Children Safe in Education 2026* and *The Prevent Duty* guidance, and complete all relevant safeguarding training

The Tutor Trust has adopted appropriate recruitment and selection procedures for staff, tutors, trustees and volunteers in the context of safeguarding and child protection and these include the following:

1. A clear definition of any role including Safeguarding responsibilities, so that the most suitable appointee can be identified.
2. A clear statement in the application form (or accompanying information) that it is an offence to apply if the applicant is barred from engaging in regulated activity relevant to children.

3. Identification of key selection criteria.
4. A wide circulation of information about vacancies to ensure equal opportunities.
5. Confirmation of the identity of the applicant.
6. Requirement to declare previous convictions and obtain an Enhanced with Barred List DBS check, for those candidates whose work will bring them into contact with children, or who will have a management responsibility in relation to those whose work does bring them into such contact.
7. A clear guarantee that disclosed information will be treated in confidence and not used against applicants unfairly, including adherence to the Disclosure and Barring Service code of practice.
8. Documentary evidence of qualifications.
9. Use of several selection techniques to maximise the chance of safe recruitment, e.g. interview, references, checks.
10. At least two representatives from The Tutor Trust meeting personally with every applicant, and an exploration of their attitudes towards working with children.
11. Written references collected, not testimonials.
12. All Tutor Trust recruitment or interview panels to have completed the Safer Recruitment NSPCC on-line training.

Online Delivery

When tuition is delivered online, the following policies (linked to this Safeguarding policy) from The Tutor Trust should be read and adhered to:

- '*Tutor Trust Remote Tuition Safeguarding Guidance*'
- *Tutor Trust Guidance on Conduct and Behaviour – For Tutors*

All documents are available on The Tutor Trust website and through the tutor training portal 'Thinqi' with access available on the Tutor Hub.

Additional processes to safeguard pupils in an online delivery setting, include:

- An appropriate parent or guardian must be present for the duration of the online session.
    - For post-16 tuition, the safeguarding policy and guidance of each individual college will be followed with regards the presence of an adult at the start and end of each session – the particulars will be relayed to all parties in advance.
- Clear guidance must be provided to the parent or guardian of the expectation of them, their child, and the tutor.
- Confirmation by the Tutor at the outset and end of the session that an appropriate parent or guardian is present.
- Contact details for The Tutor Trust will be provided to the parent or guardian, including contact details for the Tutor Trust's Designated Safeguarding Lead, to support the reporting of any safeguarding concerns at any point during the provision of online support.
- All online sessions are recorded on the Vedamo platform. All sessions are saved securely by the Tutor Trust.
- A safeguarding spot check audit is undertaken on a minimum of 1 session per Tutor per term by The Tutor Trust and recorded, detailing any safeguarding concerns raised in line with the Safeguarding reporting process as appropriate.
- In individual cases where a child cannot be recorded (i.e. they are a looked after child), other measures will be put in place to ensure sessions are monitored. This could be through Tutor Trust drop-ins or having a teacher

or teaching assistant supervise the session by also joining the session online. The parent or guardian will also be told they will need to be extra vigilant as the session is not recorded.

- Where tutors are working in-person, within the school environment but using computers or tablets as part of the tuition session, they will comply with the school's filtering and monitoring procedures.

Benedict's Law

Benedict's Law, the national school allergy safety bill came into force in September 2026. The law was developed to improve allergy safety in schools, following the death of five-year-old Benedict Blythe, who died from anaphylaxis in 2021. Benedict's Law aims to teach staff to recognise and respond quickly to severe allergic reactions, including anaphylaxis.

Benedict's Law requires schools to:

- Develop a clear allergy policy detailing how to respond to emergencies
- Ensure staff are trained in recognising the signs with anaphylaxis training
- Provide access to emergency medication like adrenaline auto-injector pens
- Improve communication and record keeping ensuring allergies are tracked

The DfE guidance, *Allergy Safety in Schools*, states that all staff working in schools, whether they have direct or indirect contact with pupils, must have appropriate allergy training, which should be renewed annually. It is the responsibility of each school to ensure that anyone working on their premises has the appropriate training in place; however, The Tutor Trust provides compulsory annual training (supplied by TES/Educare) to all tutors centred on recognising the signs of anaphylaxis and how to respond. Each school will have their own policies and procedures for this area, which will be discussed at the Introductory Meeting and

which tutors are expected to follow.

Change of Employee/Tutor Circumstances and Personal Information

Changes in Personal Information

It is important that our records are correct, as inaccurate or out of date information may affect your salary or wage or cause difficulties in situations where contact is required for emergencies. Tutors, Staff and volunteers **must** notify The Tutor Trust (as appropriate) immediately of all changes in the following personal information. Staff must inform the DSL of any changes immediately. Both are a requirement of the signed Self-Declaration and Disclosure Form held on file for each Tutor Trust employee, Tutor or Volunteer:

- Name
- Home address
- Telephone number
- Bank account details
- Examinations passed/qualifications gained
- Emergency contact
- Driving licence penalties (if you are required to drive on Company business)
- Criminal charge, arrest, caution or conviction
- Conflict, or potential conflict of interest

Personal data on Tutors, Staff and volunteers is held in accordance with the provisions of the Company's Data Protection Policy which will be made available for inspection by you if required.

Appendix A - Form for Reporting Child Protection Concerns

CONFIDENTIAL

Where a referral is made, this form will be sent to the appropriate services as a written confirmation of the referral with a copy retained by the DSL.

Name of child

Age if known

Date

School/address

What prompts your concerns? Please be specific and include the dates and times of any incidents

Were there any physical or behavioural signs? Any other causes for concern?

Have you spoken to the child? If so, what was said?

Have you spoken to the child's parents/carers? If so, what was said?

Has anybody been alleged to be the abuser? If so, give details.

Please give your name and contact details.

Signature

Today's date

This form must be completed and given, or sent in a sealed envelope marked "Private & Confidential", to The Tutor Trust's Designated Safeguarding Lead

Self-Declaration and Disclosure Form

Private and Confidential

For roles involving contact with children (under 18-year-olds).

All information will be treated as confidential and managed in accordance with relevant data protection legislation and guidance. You have a right of access to information held on you under the Data Protection Act 2018 (GDPR).

Part One

Full name:	
Preferred name:	
Address and postcode:	
Telephone/mobile no:	
Date of birth:	
Gender:	
Preferred pronouns (e.g., she/her, he/him, they/them):	

Part Two

NOTE: The role you have applied for involves frequent or regular contact with or responsibility for children you will also be required to provide a valid DBS (Disclosure and Barring Service) certificate which will provide details of criminal convictions; this may also include a Barring List check depending on the nature of the role (see organisational guidance about eligibility for DBS checks).

For completion by the individual (named in Part one):	
Have you ever been known to any Children's Services department or Police as being a risk or potential risk to children?	**YES NO** *(If yes, provide information below).*

Do you know of any reason you may be prohibited from teaching?	**YES NO** *(If yes, provide information below).*
Have you spent longer than 6 months in any country overseas? Tutors who have resided in a country outside of the UK for a consecutive period of 6 months or more within the last 5 years are advised to have an overseas police check completed. You can find out more information and how to begin the process here: Criminal records checks for overseas applicants - GOV.UK (www.gov.uk)	**YES NO** *(If yes, please provide details of the country and the dates that you were there below):*
Can you confirm that we have the authority to check that you have put your DBS on the Update Service? Please note that this will be after you have completed your DBS check.	**YES NO** *(If no, provide information below).*
Have you been the subject of any disciplinary investigation and/or sanction by any organisation due to concerns about your behaviour towards children?	**YES NO** *(If yes, provide information below).*
Have you ever had any criminal convictions or cautions in or outside the UK?	**YES NO** *(if yes, provide information below).*

Confirmation of Declaration **By signing this form or returning this form electronically you are confirming the following statements:**	
X	I agree that the information provided here may be processed in connection with recruitment purposes and I understand that an offer may be withdrawn, or disciplinary action may be taken, if information is not disclosed by me and subsequently come to the organisation's attention.

X	In accordance with the organisation's procedures, I agree to provide/apply for a valid DBS certificate and consent to the organisation clarifying any information provided on the disclosure with the agencies providing it.
X	I agree to inform the organisation within 24 hours if I am subsequently investigated by any agency or organisation in relation to concerns about my behaviour towards children or young people.
X	I understand that the information contained on this form, the results of the DBS check and information supplied by third parties may be supplied by the organisation to other persons or organisations in circumstances where this is considered necessary to safeguard children.
Signature:	
Print name:	
Date:	

FOR USE BY OFFICE STAFF

I confirm that I have seen identification documents relating to this person, and I confirm to the best of my ability that these are accurate.

For completion by the organisation:

DBS Identification 1 **(With picture)**	
DBS Identification 2	
Proof of Address	
Signature of authorised Officer:	
Print name:	
Date:	

This policy was prepared by Jason Heaford – Chief Operating Officer and Designated Safeguarding Lead.

This policy was adopted by the Board of Trustees on 13th October 2026

Date for review – 12 months from date of adoption by Board